PROMOTING PUBLIC INTEGRITY AND GOOD GOVERNANCE

Reflections and best practices for government institutions
This manual has been published within the framework of the project "Promoting Integrity & Anti-corruption in Ukraine (2017-2021)". This project was implemented by The Hague Academy for Local Governance together with the National Agency of Ukraine on Civil Service and financed by the Dutch Ministry of Foreign Affairs through its Matra programme. The aim of the project was to increase the practice of good governance in Ukrainian public institutions, with a focus on integrity, transparency, accountability and anti-corruption. The project set out to do so through capacity development of different public key institutions in Ukraine: the National Agency of Ukraine on Civil Service (NAUCS), different Ukrainian ministries, the National Parliament and the National Agency for Corruption Prevention (NACP). For the implementation of the project cooperation and expertise was provided by experts from the Netherlands’ Ministry of the Interior and Kingdom Relations, the Netherlands Court of Audit and the Dutch Whistleblowing Authority, and several independent Dutch and Ukrainian experts.

Matra is a programme through which the Netherlands aims to promote social transformation in countries in the Eastern Partnership and (potential) European Union candidate countries. Key focus areas of the programme are democratisation, developing the rule of law, good governance, social engagement and the development of a healthy relationship between governments and their citizens. Through Matra the Netherlands aims to support transition in these areas. In this process representatives of the judiciary, public institutions, civil society organisations and political parties cooperate closely in working towards and safeguarding strong and pluralist democracies under the rule of law. The Matra programme has been running continuously since 1993, making it one of the longest-running programmes with these focus areas.

Name of publication: Promoting Public Integrity and Good Governance, Reflections and best practices for government institutions

Published: This publication is the production of The Hague Academy for Local Governance. The Hague Academy is a Dutch non-profit, non-governmental organisation. Through training and education programmes for civil servants, local practitioners, and professionals at donor and development organisations, The Hague Academy seeks to develop the knowledge and skills required to improve good and inclusive governance in developing and post-conflict societies.

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Foreword

As a former Soviet republic, Ukraine has been in a transition process over the last two and a half decades, gradually moving from a closed state-centric country towards an open liberal democracy. This process has accelerated since the 2014 Euromaidan Revolution, that partially originated from popular discontent over government corruption. Apart from a regime change, this event also resulted in reforms in the field of corruption. For instance, a new “Law On Prevention of Corruption” was adopted and a number of new anti-corruption policies, mechanisms and institutions were created, such as the National Agency on Corruption Prevention (NACP), National Anti-Corruption Bureau of Ukraine (NABU) and the Specialised Anti-Corruption Prosecutor’s Office (SAPO). Reforms in the field of corruption practices as well as public administration reform have continued over the past years. Moreover, the issue of corruption has remained high on the political agenda following the election of President Volodymyr Zelensky in April 2019.

Recognition of the importance and added value of public integrity has been spreading quickly within in The Netherlands. Since the early 1990s, the Netherlands has been among the frontrunners when it comes to promoting public integrity. It has focussed on creating a culture of integrity in order to strengthen good governance, democracy and rule of law in general. Yet there is still much work to be done in this policy area, within the Netherlands and outside. The practical implementation of laws, policies, and monitoring and evaluation remains a work in progress.
Between 2017 and 2021 The Hague Academy has been cooperating in Ukraine with the National Agency of Ukraine on Civil Service on the project “Promoting Integrity & Anti-corruption in Ukraine (2017-2021)”, financed by the Dutch Ministry of Foreign Affairs through the Matra programme. The aim of the project was to increase the practice of good governance in Ukrainian public institutions. The primary focus was on integrity, transparency, accountability and anti-corruption. The programme included training programmes in the field of integrity and anti-corruption and Training of Trainers programmes. It aimed to consolidate sustainable relationships between Dutch and Ukrainian institutions involved in promoting integrity and anti-corruption. In the implementation different public key institutions in Ukraine were involved: the National Agency of Ukraine on Civil Service and its regional branches, different Ukrainian ministries, the National Parliament (Verkhovna Rada), and the National Agency for Corruption Prevention (NACP).

This practical manual is the final product of the project “Promoting Integrity & Anti-corruption in Ukraine”. It discusses the importance of integrity for public organisations and shares practical tools for building integrity within a public organisation. Moreover, it provides a reflection on the efforts of Ukraine in the field of integrity and good governance and captures best practices from the project.

We look back at a very fruitful and inspiring cooperation in which Dutch and Ukrainian counterparts have learned from each other, shared experiences, and developed long term relationships. Concrete steps have been made to raise awareness about the importance of public integrity and promote the implementation of practical measures to impede the spread of corruption and other non-ethical practices and enhance a culture of integrity. We believe that this project was only the beginning and hope that this integrity manual will inspire you to continue working on effective measures for promoting and implementing public integrity as a core element of good governance in Ukraine.
The successful end result of this project was due to the contributions and efforts by partners, institutions and experts. Without being exhaustive, special gratitudes go out to: the main Ukrainian partner and implementer in this project the National Agency of Ukraine on Civil Service and representatives from its regional branches; representatives from Ukrainian Ministries of Education and Science, Infrastructure, Social Policy, Finance, Justice, Health, National Agency on Corruption Prevention and the Verkhovna Rada; the Ukrainian School of Governance; Ukrainian interpreters; experts from the Netherlands’ Ministry of the Interior and Kingdom Relations, the Netherlands Court of Audit, and the Dutch Whistleblowing Authority and several independent Dutch and Ukrainian experts.

ii List of abbreviations

I&AC  Integrity and Anti-corruption

NAUCS  National Agency of Ukraine on Civil Service

NACP  National Agency on Corruption Prevention

OECD  Organisation for Economic Cooperation and Development

PAR  Public Administration Reform

THA  The Hague Academy for Local Governance

TI  Transparency International

USG  Ukrainian School of Governance
1 INTRODUCTION

The Netherlands has been working for more than thirty years to promote and manage public integrity, anti-corruption and good public governance. This manual elaborates on the experience of the Netherlands and international actors in the field of public integrity and good governance.

All countries have their own legislative and institutional frameworks for promoting integrity and good governance. Therefore, it is impossible to claim that what works in the Netherlands will work in other contexts as well. Nevertheless, this publication aims to provide inspiration to civil servants and government institutions for promoting public integrity and good governance in any given country, and in Ukrainian government institutions particularly. Although the approach presented in this manual is meant for government institutions and civil servants, (parts of) the approach could also be applicable within private organisations and their departments working in the field of for instance corporate governance, compliance and accountability.

Chapter 2 elaborates on what integrity within the public service means, and the importance of the concept within the broader context of Good Governance. The chapter also provides more clarification on the relation between (pro-)integrity and (anti-)corruption strategies and why it is important to make a distinction between these two. Chapter 3 discusses how to safeguard and manage public integrity within public institutions and which measures and instruments are important to install. The chapter also gives practical examples of approaches in integrity management used in the Netherlands and by the Organisation for Economic Cooperation and Development (OECD) and outlines how to go from an integrity approach to a practical integrity plan. Chapter 3 concludes with describing recommendations for embedding integrity within a government organisation and gives an overview of important arguments for continuously promoting public integrity. Chapter 4 gives an outline of tips and instruments to promote integrity within public institutions, whereas chapter 5 provides an analysis of the context in Ukraine around public integrity and good governance followed by outlining the main challenges and best practices within the country’s civil service. Finally, chapter 6 presents lessons learnt from the project “Promoting Integrity & Anti-corruption in Ukraine” (2017-2021).
Integrity is an important quality to have, both in our individual lives and in our professional careers (Huberts 2014). Integrity is also an indispensable and highly prized quality for organisations. As such, integrity management gains more and more attention at all levels of the public sector and is also acknowledged by international institutions as an important theme (for instance the United Nations, Council of Europe, European Commission, G-20, World Bank, OECD, and the G-20). Although the state of knowledge on managing integrity gradually evolved over the years, integrity remains – at least to a certain degree - a ‘tortured concept’ and a ‘wicked problem’. Whereas the first refers to a lack of agreement about what integrity precisely is, the second signifies the complexities and difficulties to improve organisational integrity.

Besides getting a clearer understanding of what integrity is (2.1), it is also important to picture it in the broader context of Good Governance (2.2). Yet another point of consideration is how (pro)integrity relates to (anti-)corruption (2.3). Although many countries and organisations do not make a clear distinction between the two, some clarity is needed. This chapter concludes with some examples and causes of integrity violations (2.4 and 2.5).

2.1 THE CONCEPT OF INTEGRITY UNRAVELLED: MORAL AND FORMAL QUALITIES

Since the early 1990s, the quest for integrity has gained a lot of attention in the public sector (Huberts 2014). But despite this heightened attention for integrity it still remains a troublesome concept, with many angles, lacking clarity about what it actually means (Heywood et al. 2017) and resisting an easy definition (Cox et al. 2003).

The etymological roots of the word integrity nevertheless provide some guidance. The Latin word ‘integritas’ refers to both moral (e.g. honesty, sincerity, and reliability) and
formal (e.g. whole, unbroken, and intact) qualities. Combined both qualities of integrity signify what is aspired (moral requirement) and what this takes (formal requirement). In general, integrity is doing the ‘right thing’, in the ‘right way’ (Heywood and Rose 2015). More specifically, [public] integrity is acting in accordance with relevant moral values and norms (Huberts 2014). In this manual the focus is primarily on public integrity.

The adjective ‘moral’ implies that integrity is a social value. Integrity is not a matter of individualistic taste, preferences, values, or opinions. On the contrary: what integrity entails is collectively determined by society. Society and its citizens have more or less coherent ideas about what is morally right and wrong (Heywood and Rose 2015). This also pertains to the integrity of civil servants: society has a general idea about what public integrity and Good Governance entails, and what not.

2.2 INTEGRITY AS A KEY ELEMENT OF GOOD GOVERNANCE

A simple definition of ‘Good Governance’ is what politicians and civil servants (together also referred to as public servants) are expected to do in terms of governing and serving their country and its public institutions. There are different classifications of the composing elements of Good Governance. In this publication we distinguish four elements: economy, accountability, legality and integrity.

The first element, ‘economy’ entails that those who govern and serve the country (national, regional and local) make use of public resources (finances, time etc.) in a responsible way. Public service should be delivered efficiently and effectively. Public servants should be aware that they work with taxpayers’ money. The second element, ‘accountability’ entails that a democratic government should act in the public interest and thus on behalf of the people. Government should be responsive and accountable to its citizens. Public servants should transform the outcome of the democratic process (elections) into corresponding policy decisions and measures. As such the peoples’ wishes should be listened to (responsiveness) and the government should be prepared to take responsibility for its actions and to give a satisfactory reason for them (accountability).

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1 We define civil servants here as all government employees (national, regional and local level).
The third element, ‘legality’ entails that government and its public servants should act in a legal way. Government should comply with the constitution, laws and regulations. In other words, government itself should play by the rules; public servants should do the things ‘right’. The fourth and final element of Good Governance is ‘integrity’, which refers to the ethical and moral requirements of governance and is defined in chapter 2.2. It can be argued that integrity is a key element of Good Governance as integrity is also closely related to the other three elements. For instance, the misuse of public resources (economy), the absence of sufficient openness and transparency (accountability), and procedural irregularities (legality) are not just technically wrong, but also morally wrong.

2.3 ANTI-CORRUPTION AND PRO-INTEGRITY: IT TAKES TWO TO TANGO

Sometimes pro-integrity and anti-corruption programmes or strategies are used as synonyms. But there are some important differences, which will be highlighted in this paragraph.

Corruption is a legal concept and is often formulated in terms of the misuse of public power (by elected politicians or appointed civil servants) for private gain. In order to prevent corruption countries and organisations develop anti-corruption strategies. Anti-corruption strategies are mostly rules-based, top-down imposed, designed to avoid criminal behaviour, and strive to detect corruption within organisations. The basic assumption is that not all people are always immune to corruption challenges. Behaviour thus must be monitored, investigated, and sometimes employees should get fired. Because anti-corruption focuses on avoiding wrongdoing it could be labelled as a negative strategy.

Integrity is a moral concept and integrity strategies are to a large extend values-based, designed in a bottom-up fashion, and encourage moral behaviour and thus support civil servants to make the right ethical decisions based on public sector values and principles. As such it can be labelled as a more positive and encouraging strategy with a stronger emphasis on prevention, training, education, and support. It has a stronger focus on fostering an ethical climate within organisations. Because of its moral lens an
integrity strategy has a broader scope than an anti-corruption strategy. Instead of just refraining from private (financial) gain integrity strategies are about “doing the right thing, in the right way”.

The used adjectives ‘negative’ and ‘positive’ do not implicate that integrity strategies are good and to be preferred over anti-corruption strategies because they are wrong or bad. On the contrary, an inclusive approach of both strategies is preferred and will be most effective. Whereas one side is more focused on repression (reactive), the other side relies more on prevention (proactive). However, both are needed and should thus complement each other. Prevention without clear norms, rules and sanctions has no bite, whereas sanctions and punishment without aspirational values and training is rather unpromising and dispiriting. In sum, it could be suggested to bridge the gap between the two strategies and acknowledge that integrity programs or policies should be combined with anti-corruption strategies. Moreover, both anti-corruption and pro-integrity strategies should be carefully designed, as the root causes of the problem and the context are important to consider. Corruption is for instance often a symptom of a social system that needs to be reformed. Therefore, when designing strategies, it is important to customise them to the specific situation.

2.4 A TYPOLOGY OF INTEGRITY VIOLATIONS

To give more substance to the concept of integrity, or public integrity specifically, it helps to give some examples of integrity violations that occur in the public sector and of the effects such violations may have. Without having the ambition to be exhaustive, a rough distinction can be made between material and social integrity violations (Hoekstra & Heres 2016).

*MATERIAL* integrity violations involve financial or other benefits for private gain, such as: corruption, fraud, theft of company resources, accepting gifts, the misuse of information, and conflicts of interest. As such corruption is an outcome of a lack of integrity. Social integrity violations on the other hand are linked to all kinds of inappropriate work floor behaviour. This refers to unethical conduct between colleagues, between management and their employees, and between civil servants and citizens. Examples include discrimination, intimidation, sexual harassment, bullying, the misuse of power, but also the misconduct of civil servants in private time which compromises their
formal position and the reputation of their organisation. Table 1 presents a more structured overview of types of integrity violations. Whereas the first five types (1-5) refer to material integrity breaches, the second five types (6-10) refer to social integrity violations.

Table 1: Typology of integrity violations (Lasthuizen, Huberts and Heres, 2011)

<table>
<thead>
<tr>
<th>Corrupt: Bribery</th>
<th>Fraud and theft of Resources</th>
<th>Conflicts of (private and public) Interest through ‘gifts’</th>
</tr>
</thead>
<tbody>
<tr>
<td>Corruption: Favouritism (nepotism, cronyism, patronage)</td>
<td>Conflicts of (private and public) Interest through ‘gifts’</td>
<td>Improper use of Authority</td>
</tr>
<tr>
<td>Misconduct in private time</td>
<td>Improper use of Authority</td>
<td>Indecent treatment of colleagues or citizens²</td>
</tr>
<tr>
<td>Waste and abuse of organisational Resources</td>
<td>Misuse and manipulation of information</td>
<td></td>
</tr>
</tbody>
</table>

² For instance harassment, discrimination and intimidation.
2.5 CAUSES OF INTEGRITY VIOLATIONS: INDIVIDUAL, ORGANISATIONAL AND SOCIETAL LEVEL

Integrity violations are in general the result of a combination of different causes, on different levels (Hoekstra and Heres, 2016). On the individual level integrity violations are caused by public servants’ personal flaws and weaknesses, like for instance: gambling-, drugs-, and alcohol related problems, having wrong friends, susceptibility for social and material standing, susceptibility for group pressure, or lack of self-confidence.

Many integrity violations are committed because civil servants must operate in an unethical organisation. On this organisational level unrealistic targets, unethical leadership, unclear or contradictory rules, failing internal procedures and control systems, group pressure, too much autonomy, underpayment, and too many seductions are mentioned as possible drivers for unethical behaviour (Kaptein, 1998). Hence, in case of integrity violations, it is not enough just to fire violating employees. Attention should also be paid to flaws in the organisational structure and culture that provoke unethical behaviour.

On the societal level certain developments can also influence organisational circumstances and individual behaviour. A troublesome economic situation, or even a financial crisis leads to austerity measures and budget-cuts across the public sector. This might trigger growing job insecurity (postponed promotions, not-extended contracts, layoffs), raises stress, frustration, and feelings of unfairness on the work floor. This is a source for vindictiveness against the employer/organisation (Hoekstra, 2016). It makes employees more likely to flirt with impropriety and can thus result in the abuse of company assets, theft, and other integrity violations (Treviño and Nelson, 2004). But also, other societal trends like the increased use of social media (Hoekstra and Van Dijk, 2016), the use of Artificial Intelligence (big data), and higher moral standards (#MeToo discussion) raise new ethical and integrity concerns. To conclude, integrity violations are the result of a complex array of interacting and often mutually reinforcing factors across individual, organisational and societal levels.
As outlined in chapter 2 safeguarding and managing public integrity can be wicked problem. Wicked problems are complicated as they have multiple causes, with many involved responsible actors, and are also socially complex. Therefore simple ‘one size fits all’ solutions are not at hand in this respect. Safeguarding and managing public integrity thus requires a diverse and coherent set of measures and instruments to tackle it. Comprehensive integrity policies and measures at the organisational level are considered the most viable and realistic measures for public managers to implement, as these are within the direct control of the organisation (Hoekstra and Heres 2016). And since integrity is a social value that is influenced by societal developments, regular upgrades of the integrity management system are needed to keep them up to date.

As we will see in this chapter, adequate integrity management systems are to be designed along three dimensions: the ‘software’ dimension, the ‘hardware’ dimension and the ‘operating system’. In section 3.1 we will explain these dimensions more in detail. In 3.2 we will outline how these dimensions are integrated into the Dutch model and the model of the OECD for managing integrity. Section 3.3 will discuss how to convert the principles of these two models into a concrete integrity policy plan. This chapter will conclude with listing some challenges and recommendations regarding integrity management (3.4) and present the ‘case’ for integrity management (3.5).
3.1 INTEGRITY MANAGEMENT SYSTEM: THREE DIMENSIONS

Hoekstra and Heres (2016) propose a three-layered approach and distinguish between the ‘software’, the ‘hardware’, and the ‘operating system’ dimensions of an organisational integrity management system.

The ‘software’ dimension concerns measures aimed at positively influencing the ethical culture within the organisation through employees’ internalization of (public) val-
ues. Ideally, the measures aim at creating a culture marked by openness, safety, mutual respect and trust. Managers play a particularly important role in this. Examples of the ‘software’ include introductory courses to new staff to raise awareness about the importance of integrity within the civil service and how to raise concerns about integrity breaches (Chapter 4.5), ethical leadership, dilemma training courses (Chapter 4.2), and the oath of office.

The ‘hardware’ dimension concerns the supervision, control and enforcement of rules, procedures and guidelines needed to support and reinforce the ethical culture of the organisation. Finance, Legal, Audit and HR departments play an important role in this. Examples of the ‘hardware’ include procedures for procurement, contracting, side jobs, as well as reporting and investigation procedures. This dimension resembles the principles of anti-corruption strategies.

The ‘operating system’ dimension concerns measures intended to institutionalise integrity policies in a systemic manner. To this end, a clear vision on integrity management is needed that connects software and hardware measures and ensures their internal consistency. Integrity officers (Chapter 4.4) play an important role in organising and coordinating integrity within organisations. Examples of the ‘operating system’ include monitoring the number and nature of integrity violations, evaluation of policies, and risk analysis (Chapter 4.5). Inspired by Transparency International’s Greek temple as a metaphor for the constituting parts of a National Integrity System, the organisational dimensions are visualised in Figure 1.

*Figure 1:* Dimensions of an organisational integrity management system
3.2 APPROACHES TO MANAGE INTEGRITY: OECD AND DUTCH MODEL

The OECD has developed a comprehensive model for managing public integrity. The model focuses on three major components - culture, accountability, and system - and thirteen sub-components. The *culture* component resembles the before mentioned software dimension and emphasises for example the need of ethical leadership, the importance of integrity training, and the need of an open and safe working environment to raise integrity issues. The *accountability* component resembles the hardware dimension and encompasses for instance detection, investigation, sanctioning and other control and oversight mechanisms. The *system* component resembles the operating system and entails for instance the development of an integrity framework/strategy, setting clear objectives, coordination, and evaluation.

The OECD model is still work in progress. The OECD works on a handbook to flesh out all the (sub-) components. Therefore, in this manual a second, longer existing, model will be presented that was designed for the Dutch government, applied in the Dutch public service and improved over time based on practical experiences (Hoekstra and Zweegers 2016). The model, called the 'Integrity Infrastructure', lists the seven elements of integrity management, which are visualised in Figure 2 and described in Table 2.

*Figure 2:*
Integrity Infrastructure: elements visualised

*Table 2:* Integrity Infrastructure: elements described

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<table>
<thead>
<tr>
<th><strong>7 Elements of the Integrity Infrastructure</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Commitment &amp; vision</strong></td>
</tr>
<tr>
<td><strong>Values &amp; standards</strong></td>
</tr>
<tr>
<td><strong>Rules &amp; procedures</strong></td>
</tr>
<tr>
<td><strong>HRM policies &amp; culture</strong></td>
</tr>
<tr>
<td><strong>Incidents &amp; enforcement</strong></td>
</tr>
<tr>
<td><strong>Monitoring &amp; reporting</strong></td>
</tr>
<tr>
<td><strong>Organising &amp; embedding</strong></td>
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</tbody>
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3.3 FROM AN INTEGRITY MODEL TO AN INTEGRITY PLAN

Integrity management should be considered as a dynamic activity. It should (respectively) be designed, implemented, monitored, and adapted in an ongoing and recurring way. These four phases resemble the phases of the so-called PDCA (plan-do-check-act) cycle, originally developed by the American scholar William Deming. The integrity plan provides guidelines to upgrade and reboot the integrity management system periodically. Table 3 combines the elements of the integrity infrastructure with the phases of the PDCA cycle, which leads to a dynamic integrity policy or action plan.

Table 3: Elements of an integrity policy or action plan

<table>
<thead>
<tr>
<th>Elements</th>
<th>Integrity Policy Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plan</td>
<td>Mission &amp; vision&lt;br&gt;What is the importance of integrity for the organisation, what definition, which ambition, which strategy, how much time and budget, expertise is required?</td>
</tr>
<tr>
<td></td>
<td>Requirements &amp; measures&lt;br&gt;Which basic integrity requirements (laws and regulations) do exist? To what extent does the organisation already meet these requirements?</td>
</tr>
<tr>
<td>Do</td>
<td>Implementation &amp; activities&lt;br&gt;Implementing specific integrity measures and activities to achieve the desired results?</td>
</tr>
<tr>
<td></td>
<td>Actors &amp; responsibilities&lt;br&gt;Which (internal) officers and departments are responsible for the implementation of these integrity activities?</td>
</tr>
<tr>
<td></td>
<td>Coordination &amp; coherence&lt;br&gt;How is coherence between various policy measures and activities ensured, who coordinates the various actors?</td>
</tr>
<tr>
<td>Check</td>
<td>Monitoring &amp; evaluation&lt;br&gt;Monitoring, evaluating and reporting the progress of the integrity activities, are the intended results realised?</td>
</tr>
<tr>
<td>Act</td>
<td>Adaptation &amp; renewal&lt;br&gt;How to improve the performance of the integrity activities? What works, what should be improved, what is missing, which new instruments, approaches are needed to keep it on the agenda?</td>
</tr>
</tbody>
</table>
3.4 CHALLENGES AND RECOMMENDATIONS

Based on practical experiences and insights, main challenges in the field of integrity management include coherency, implementation, balance, and continuity. In this paragraph these challenges and their implications/recommendations are briefly discussed.

First of all, it is acknowledged among scholars and practitioners that integrity instruments and initiatives are more effective when they are (Van Tankeren, 2010) coherent. Coherency means that the components/instruments of an integrity program fit together and reinforce each other. Coherency promotes synergy and effectiveness (Maesschalck and Bertok 2009). It is the combination of instruments that has a larger effect on the behaviour of employees than the mere sum of the effects of the individual components and instruments. In reality coherency is, unfortunately, often lacking (Hoekstra and Kaptein 2013 Lawton, Rayner and Lasthuizen 2013). The fact that integrity management is a multidisciplinary policy activity (Huberts 2014), and various departments within an organisation (e.g. HR, Audit, Legal, Finance, the Work Council) are responsible for certain aspects of integrity policies often leads to an incoherent and therefore less effective approach. Care for coherency and close collaboration among the organisation’s responsible integrity key-players is thus recommended.

Secondly, integrity policies and instruments should – naturally – also be implemented. Integrity policies are relatively easy to develop, but they are often not executed and thus remain a paper reality, failing to sort any effect. International research points out that integrity management does not suffer from a lack of rules or instruments but from implementation weaknesses (Demke and Moilanen 2012; Hoekstra 2016). Moreover, poorly implemented integrity policies in the long term: negatively affect organisational members’ perceptions of those policies; undermine the legitimacy of integrity programs; breed organisational cynicism; lead to organisational misconduct; and thus, may do more harm than good (MacLean et al. 2015). A due follow up and execution of integrity policies is thus recommended.

Thirdly, it appears to be difficult to find a balanced approach combining both anti-corruption and pro-integrity strategies. As described in chapter 2.3 a combination is the most effective, yet finding the right balance often proves to be a challenge. Emphasis on one strategy or another seems to shift over time with the risk that one of the strategies remains neglected. A proper analysis of the current state and maturity of the three dimensions (hard, soft, and general controls) of the integrity management system can
be of help to determine which policies and instruments are already sufficiently in place and which of them need to be developed.

Fourthly, it's important to consider that 'big' corruption cases often start with 'smaller' integrity violations. If smaller scaled integrity violations are not detected and redressed in time, they tend to grow bigger (in terms of people and money involved) in a fast mode. As such it is wiser and cheaper to promote integrity than to combat corruption. Fifthly, integrity management finally requires continuity. Many other organisational issues easily tend to overshadow the concern for integrity and integrity management. Integrity however requires constant care and attention. It is also acknowledged that integrity measures are often incident driven and that integrity projects often start with great enthusiasm but that attention then tends to fade away because of other organisational priorities. Diminishing attention for integrity management may lead to cynicism and distrust regarding management's intentions and may transmit the message that integrity is less important than stated. Appointing an integrity or ethics officer (Chapter 4.4) may help to keep the concern for integrity management on the agenda. Integrity officers should also consider where to begin. This of course depends on the specific situation within the organisation (what risks and dilemma's do employees face in their daily work and what integrity measures are already in place) and of the ambition and commitment of management. Research, however, suggests that it is best to start with formulating a Code of Conduct (1) (Chapter 4.2), followed by organising integrity training and internal awareness campaigns (2) (Chapter 4.5), setting up monitoring and auditing systems (3), developing investigations and sanction policies (4), establishing an integrity reporting line (5), and incentive policies and reward systems (e.g. nominating integrity champions) for integrity behaviour (Kaptein 2015). However, many organisations have their hard controls (like items four and five) already in place and should thus focus on the softer controls (like items two and five). As such integrity management should follow a step-by-step approach that gradually evolves over time without being over-ambitious (since implementation takes time).
3.5 THE IMPORTANCE OF PUBLIC INTEGRITY

Literature provides us with a range of arguments expressing the importance of public integrity. As Table 4 indicates, one can distinguish between external (societal) and internal (organisational) arguments for fostering public integrity (adapted from Hoekstra & Heres 2016). This table presents the ‘business case’ for fostering public integrity and can be used by integrity/anti-corruption entities and integrity coordinators to support their claim that their endeavours are genuinely worth it.

Table 4: External and internal arguments for integrity

<table>
<thead>
<tr>
<th>Societal arguments</th>
<th>Organisational arguments</th>
</tr>
</thead>
<tbody>
<tr>
<td>The government is extremely powerful, is authorised to use violence, and holds a monopoly on for instance issuing passports, subsidies, benefits, permits and licenses. This creates a lot of dependency.</td>
<td>An unethical organisational culture leads to feelings of fear, uncertainty, and psychological insecurity. Employees are affected by unethical behaviour of their co-workers.</td>
</tr>
<tr>
<td>The government is funded by taxes. Taxpayers have the right that their money is spend on behalf of the general interest, instead of on the private interests of government officials.</td>
<td>Organisational integrity contributes to employees’ work motivation, organisational trust and commitment, it leads to better work relations and performance and reduces work stress, emotional exhaustion, and sick leave.</td>
</tr>
<tr>
<td>To be able to function effectively and efficiently the government requires legitimacy. Ethics and integrity are a prerequisite for attaining and maintaining public support.</td>
<td>Organisations with a good reputation and which are known for their high ethical standards are more attractive. For such organisations it is easier to attract high quality personnel.</td>
</tr>
<tr>
<td>The government must lead by example if it wants the citizens to abide to the law and public morale. Ethical role modelling is thus of utmost importance.</td>
<td>Integrity violations cost a lot of money, damage the organisational reputation, and hamper the due functioning of public service delivery.</td>
</tr>
<tr>
<td>Research on the social conditions for human happiness also points out that the presence of public integrity and the absence of corruption is of strong influence on the happiness of both citizens and civil servants</td>
<td></td>
</tr>
</tbody>
</table>
3.6 THE IMPORTANCE OF FREQUENT AND OPEN COMMUNICATIONS ABOUT PUBLIC INTEGRITY

The importance of public integrity and the arguments for integrity listed in chapter 3.5 should frequently and directly be communicated and discussed within organisations. This creates a culture of openness and awareness. Openness encourages employees to voice their integrity issues and concerns and makes it possible to redress integrity violations in an early stage. Openness requires that:

- employees feel safe enough to voice their concerns;
- that these concerns are seriously dealt with;
- that whistleblowers will not be treated as 'snitches' or 'traitors' by colleagues or management;
- and that they should not be afraid for retaliation.

Frequent communications and discussions also enhance the integrity awareness on the work floor. The more often it is discussed the better employees understand what public integrity is about and that management considers it as an important organisational value. Therefore, it is recommended to integrate the topic of integrity in organisational processes. As such integrity could for instance make part of:

- the pre-employment screening, hiring processes, and introduction courses for new employees;
- management could regularly discuss integrity during team meetings;
- integrity could be discussed during formal job appraisal procedures;
- the organisation could provide integrity and dilemma trainings for employees (Chapter 4.5) and pay attention to integrity in organisational newsletters, its intranet and other channels for internal communication.
As described in chapter 3.6 for the promotion of integrity within institutions it is important to frequently and directly communicate about the importance of public integrity and its arguments. This creates a culture of openness and awareness and stimulates employees to raise their voice about integrity issues and enables an organisation to address integrity violations in an early stage and prevent violations. The better integrity is embedded as an important organisational value and the more frequent it is discussed; the better employees understand the importance of public integrity as a core element of good governance. There are different ways to address and promote integrity, and to work on a culture of openness and awareness. In this chapter first several general tips for promoting integrity will be listed (4.1). Afterwards the importance of creating a Code (of Ethics) will be described (4.2) and explained how risk-analysis can contribute to prevent integrity violations (including corruption) and to stimulate open and transparent work processes (4.3). This will be followed by highlighting the need for dilemma training sessions (4.4) and how other training activities can contribute to raising awareness about integrity (4.5). Finally, it will be explained how the appointment of an integrity or ethics officer may help to keep the concern for integrity management on the agenda (4.6).

4.1 TIPS FOR PROMOTING INTEGRITY ON A NATIONAL LEVEL

In each country government has its own structure and culture. The embedding of integrity legislation, policies, and programmes thus also differs per country. In general, the following tips can be given to promote integrity (Hoekstra and Zweegers 2016).

→ It is important to regulate by law that public institutions are obliged to formulate integrity policies and that this law specifies which integrity measures (e.g. codes,
training, risk assessment, integrity officers) public organisations should have in place. In the Netherlands, this is for instance laid down in the Civil Servants Act; the Municipalities Act; the Provinces Act; and in the Water Authorities Act.

→ Integrity policies will be more effective if they are part of a systematic and coherent approach. Countries can adopt or be inspired by existing integrity models and infrastructures like described in chapter 3.2 but can also decide to develop their own system.

→ The government can also benefit from the input and support of NGOs, Courts of Audits Audit Offices, scholars, and international institutions for the design and improvement of integrity legislation, policies and systems.

→ It is necessary for individual public sector organisations to receive adequate support in setting up, implementing, and developing their integrity policies. This avoids that government organisations must do this entirely on their own. A national integrity office or authority could fulfil such a role.

→ It is advisable to (centrally) monitor the actual implementation of these policies on national, regional, and on local level. Regular monitoring and evaluation are crucial in order to keep a finger on the pulse and to encourage further implementation.

4.2 CODE (OF ETHICS)

As outlined in chapters 3.2 and 3.4 one of the first steps for embedding integrity within an organisation is developing an ethics or integrity code. A Code formulates what citizens can expect from the organisation, what employees can expect from each other, what management can expect from employees, and vice-versa. Ideally a code consists of two different parts: an abstract value section, and a more concrete norm section.

Firstly, the value section. In this section the organisation states which public sector values are considered important. Huberts and Van der Wal (2014) clustered the most frequently used values and distinguish for instance: honesty, impartiality, transparency, reliability, responsibility, accountability, efficiency, courage, responsiveness, lawfulness, loyalty, stability, and collegiality. Sometimes such values are already determined in a

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national code of conduct. Organisations then can apply these values, but it may also be necessary to determine some additional values for the specific organisation. Values are rather abstract and therefore they can provide guidance for all kinds of situations.

Secondly, the norm section. In this section the organisation formulates more concrete and specific rules and procedures. For instance, can employees accept side jobs, gifts, and invitations? How should they declare work-related expenses, how to deal with confidential information, what are the rules for talking to the press or posting work-related comments on social media? What to do when they witness a possible integrity violation, who should they report to, and how (referral to reporting or whistleblowing procedure). Important to keep in mind is that all norms should be based on the values; that makes the code coherent. Rules pertaining to confidential information could for instance be connected with the value reliability. This also ensures that is clear for the employees why certain integrity rules are important: because they are based on public sector values.

An often-used credo is a *code is nothing, but coding is everything* (Kaptein, 2008). This credo emphasizes the process of making, implementing and revising the code. Again, it is important to involve a representative delegation of the workforce in the coding process. This delegation can reflect on the selection of the most important values and norms of the organisation. Another aspect is the active communication of the code: employees should know that it exists, know how to use it, and be able to understand its content. A code is not a static, but a dynamic document: it should be updated every two or three years.

### 4.3 Risk Analysis

For organisations it is important to know what kind of risks their employees are up against in their day-to-day work. Insight in that information is necessary since it provides valuable input for the design of the organisation’s integrity program/policies. Moreover, risk-analysis is the basis for every integrity program. Only when an organisation knows what its risks (vulnerabilities) are, it knows what integrity measures should be taken to counter these risks.

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Audit departments often are experienced working with risk-analysis methods and can be of help to design and implement integrity risk-analysis. Risk-analysis works best when applied on department, office, or team level. An HR department for instance faces different risks than a procurement department, a policy department, a traffic police team, roadworkers, an office that issues passports, drivers licenses, or building permits etc... So, the first step is to determine the ‘right’ unit level for the risk-assessment.

The second step is to make a list of the most vulnerable processes in that unit. Most vulnerable are those processes/activities where the risks are high in terms of impact (big consequences) and in terms of likelihood (big chance that things go wrong). This is called a risk assessment: impact x likelihood. Input of the employees in this step is considered necessary since they know best what, when, and where can go wrong. Table 5 provides an example of a matrix for a risk assessment.

Based on the list of the most vulnerable processes (every organisation has them) it should be determined what measures the organisation has in place to counter them, if these measures are known, if they are used, if they actually work, whether they have to be adapted to make them more efficient, and whether certain measures are missing. This is also called the gap-analysis in which is determined whether the measures are sufficient considering the risks. Input of the employees in this third step is considered necessary since employees know best what measures work, or not, and whether they are sufficient to counter the risks.

Risk-analysis should be a periodical exercise since risks change over time and since the effectivity of measures may wear out. Ideally you begin with the riskiest processes/activities and work through the complete list over time. Risk-analysis sessions work best when conducted by a small but representative delegation of the unit. Openness and willingness to freely discuss the risks and measures among the participants is of the essence.
### Table 5: Risk analysis

<table>
<thead>
<tr>
<th>Name of department: Risk analysis</th>
<th>Processes in your institution/department that are most vulnerable to integrity risks/ violations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Type of process:</strong> Procurement (example)</td>
<td><strong>What is the situation/what happens?</strong></td>
</tr>
<tr>
<td>Tenders are awarded to befriended relations of civil servants, managers or directors</td>
<td>There is pressure on officials to prioritise or better inform a particular party so that that party can offer a better and lower quote</td>
</tr>
<tr>
<td>Provider who’s also a friend</td>
<td>There are clear procurement rules</td>
</tr>
<tr>
<td>The contracting civil servant</td>
<td>The Code of Conduct prescribes transparency, objectivity and honesty</td>
</tr>
<tr>
<td>His colleague or superior</td>
<td>There is no fair competition and not the best provider is chosen</td>
</tr>
<tr>
<td></td>
<td>The risk is that poorer quality is delivered for too much money.</td>
</tr>
<tr>
<td></td>
<td>Possible solutions:</td>
</tr>
<tr>
<td></td>
<td>Tightening the rules</td>
</tr>
<tr>
<td></td>
<td>Better communication of existing rules</td>
</tr>
<tr>
<td></td>
<td>Better supervision of procurement process by [...]</td>
</tr>
</tbody>
</table>

#### 4.4 DILEMMA WORKSHOP

For organisations it is important to understand the types of moral dilemmas related to integrity their employees face in their day-to-day work. This provides valuable input for the design of the organisation’s integrity programme/policies. Equally important is that employees are sensitised and trained to detect and cope with such dilemmas.

A moral dilemma occurs when one has a difficult choice to make between two or more conflicting moral values or duties. He/she has to choose one moral value over another and make a morally sound decision. The values can be conflicting personal values. Yet

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*Possible processes could be: Recruitment (HR), issuing passports/visas/building permits, financial transactions, granting subsidies (see Chapter 4.3) etc.*
when it is a work-related dilemma personal values can also conflict with organisational values, so for instance the code of conduct.

Rules and regulations, including codes of conduct, provide guidance on ethical behaviour and the values of the organisation. But not all possible situations can be foreseen and covered by such standard procedures. There will always be new situations, or so-called grey areas, that employees will need to deal with. Analysing and discussing such dilemmas in a workshop stimulates ethical awareness based on peer-to-peer learning and contributes to an open and ethical organisational culture, as discussed in chapter 3.6.

There are different dilemma investigation methods or workshops, but the 7-step approach is the most used method in the Netherlands. This approach was also used by The Hague Academy in their training sessions for Ukrainian government officials during the project “Promoting Integrity & Anti-corruption in Ukraine” (2017-2021). The seven steps are summarised below:

1. Formulate the dilemma as precise as possible: what decision do I face, what makes it difficult.

2. List the most important stakeholders that are involved (face the consequences of the decision): for instance, colleagues, friends, citizens, my boss, companies, or the organisation itself.

3. Formulate the decision as a choice between two opposing options: for instance yes, I do reveal that information (option A left column), or no I don’t reveal that information (option B right column).

4. Determine what option (A or B) you choose.

5. Describe on what main argument(s) you decide, while taking into account the interests of all involved stakeholders (→ check step 2): I choose option (A or B) because (pro-arguments), and despite (con-arguments).

6. Determine if the arguments are principle-based (fundamental rights, legislation, public sector values, organizational policies, procedures etc.: things you would like everyone to respect, always, irrelevant of the consequences) or consequence-based arguments (what brings me, us, the organization certain advantages, what pleases us, what is convenient, efficient, etc.: things that bring the best results for most people).

7. What will be my final conclusion: (→ check step 4: keep in mind that principles usually outweigh consequences).
A dilemma workshop is ideally conducted by an internal or external integrity adviser or trainer, or someone within the organisation who is dealing with integrity issues (for instance from the HR department). Dilemma workshops work best with about 10-14 participants. This ensures that everyone can participate, and that enough diverse arguments will be collected. Participants can be close colleagues, people from different departments or a combination of both. It is very important that there is an open and safe environment to freely discuss the arguments and decisions among the participants. For people who are reluctant to discuss their own dilemmas in a face-to-face environment, organisations can use role plays, recorded videos, scenarios and quizzes. Or run an online course on professional integrity dilemmas.

4.5 TRAINING AS AN INSTRUMENT TO PROMOTE PUBLIC INTEGRITY

As mentioned in chapters 2 and 3, organising integrity training is an important preventive instrument in the corruption prevention toolbox. It contributes to raising awareness about the importance of integrity within the institution and stimulates the internal learning process about addressing integrity issues. Such trainings also contribute to creating a safe and open work atmosphere where one can discuss integrity related issues without fear of retribution.

Integrity training can exist next to other activities to raise awareness. The added value of integrity training over one-way forms of communication such as awareness campaigns is that it enables interaction among peers/colleagues, as well as amongst participants and the trainer. As such, it also provides an opportunity for the trainer to check in on trainees’ knowledge and sentiments about integrity in the organisation.

Integrity training ideally is not solely focussed on providing participants with knowledge about rules and regulations (e.g. the Code of Conduct), but also on providing participants the space to share their experiences. Often people the difficulty is not in understanding the general rules and procedures, but in applying those rules and procedures in a practical complex work environment.
There are trainings for different categories of civil servants which serve different purposes. Below are a few examples:

- Dilemma trainings (Chapter 4.4) for general staff or employees that have to deal with integrity issues in their daily work: the focus of these types of trainings is on the moral learning process of civil servants. By discussing professional moral dilemmas on the work floor, this training enables civil servants to make the morally sound judgements and take ethical decisions;
- A basic course for new employees about the concept of integrity within the civil service and its importance for the institution, as well as key rules and procedures;
- Training for those in charge of shaping the internal integrity policy (e.g. HR department, integrity advisers, or managers). This training focuses on organising integrity within an organisation, focusing on procedures, policies and practical instruments;
- Trainings for managers: managers have an important role when it comes to setting the example for employees. A training about for instance “Ethical Leadership” highlights that it is not only important to act with integrity yourself, but also actively promote integrity within the organisation, communicate about it, and create a safe and open space for employees to reach out to management and if needed report breaches in a safe way.

Whichever type of training or other awareness raising instrument are selected, they should be organised regularly in order to keep the subject on the agenda and to highlight integrity as an important organisational value. As with many other newly introduced activities, one risks losing the momentum if no follow-ups or refresher moments are organised.
4.6 APPOINTING AN INTEGRITY COORDINATOR

To avoid integrity policies or programmes to become incoherent and fragmented it is useful to appoint an integrity officer or coordinator: “An organisation which implements an ethics and compliance program without designating an individual to oversee it, risks the possibility that the function will fail for lack of leadership. Similarly, talking about the importance of ethics without creating a formal function to uphold and promote organisational standards may be perceived as hypocritical” (Ethics Resource Center 2007:13-14). The creation of such a coordinating function is considered crucial as it (Maesschalck and Bertok 2009):

→ allows for synergies between instruments;
→ allows for accumulation of expertise based on experiences;
→ ensures continuity of integrity in the long term; and
→ strongly signals that integrity is considered important within the organisation.

What does it take to become an integrity officer or coordinator? He, or she should:

→ know the organisation well enough and have an impeccable ethical reputation;
→ be professionally trained as an integrity officer;
→ be trusted by the organisation’s employees and management;
→ be critical enough to raise difficult issues at the highest level of the organisation;
→ be an excellent networker and communicator and should have a positive and constructive attitude;
→ should have a (academic) background in for instance audit, law, public administration or philosophy;
→ should get adequate support from (top) management in terms of sufficient commitment, time, budget and other organisational resources.
The notion of ‘good governance’ is a difficult concept to assimilate into the Ukrainian discourse on public administration. It is often misinterpreted and misunderstood. Up to today, we hear heated expert discussions on how to properly translate the word ‘good governance’ and how it relates to the Ukrainian term ‘dobrochesnist’ (English: integrity).

Nevertheless, the concept of good governance provides an useful framework for the introduction of a new style of public policy making and public administration, where the Government and other public authorities are not the only party making public policy decisions, but on the contrary – the decision-making process involves coordination and cooperation with numerous stakeholders, especially non-state actors. Such a style of public management is based on the concepts of ethical leadership, broad and comprehensive communication, accountability, openness, transparency and public involvement in solving important and complex social problems.

**Good governance in public policies**

The strategy of public administration reform for the period up to 2021 – approved by the Cabinet of Ministers of Ukraine in June 2016 and the Government Action Plan for the Implementation of the Open Government Partnership Initiative (2018-2020) – serve as a road map for the promotion of good governance in Ukraine. Public consultations, access to public information, accountability, citizens’ awareness about the activities of government institutions are becoming an integral part of public administration in Ukraine. The current practice of public administration shows the growing influence of civil society on the development and implementation of public policy, including through groups of self-organised citizens.
Good governance initiatives

Not everything works ideally, as we would want it to work, but step by step good governance is becoming common practice within Ukrainian public administration. In 2016 the “Law of Ukraine On Civil Service” required mandatory and public annual reporting by heads of executive bodies. Each year heads of executive government agencies need to present their activity reports to representatives of public councils, civil society, employees associations, trade unions, experts in relevant fields and mass media.

Furthermore, there is a “Law On Access to Public Information”, and the national Open Data portal is becoming a reliable source of information about state budget expenditures, as well as about other socially sensitive indicators of the state’s functioning.7

Moreover, there is the electronic asset declarations system, which is the state database of asset declarations of public officials.8 This instrument enables civil society to provide their own assessment of the activities of civil servants and make suggestions for improving the activities of a particular public authority.

Ukraine has introduced the principle of involving citizens in the creation of public policy at various levels: from national to local. Public authorities and local governments need to be able to make decisions based on discussions with citizens that will provide an appropriate evidence base for their decisions. At the same time, the purpose of involving citizens in this process is to hear the voice of everyone, each individual and group, and especially those who are affected by a particular policy or reform. This citizen participation mechanisms still needs to be significantly improved. Yet it can be a tool for ensuring the openness, transparency and accountability of government when properly applied.

The National Academy of State Service together with the Secretariat of the Cabinet of Ministers of Ukraine, UNDP and a Ukrainian NGO CCC Creative Center has tested the method of evaluating the activities of executive bodies in terms of their interaction with the public. This provides an opportunity not only to assess the status of such work, but also to find ways to improve it at various levels.

Good governance requires appropriate capacity of public institutions. If good gover-

7 https://data.gov.ua/
8 public.nazk.gov.ua
nance is not properly understood and embraced as a means of ensuring the effectiveness and efficiency of government action, it can remain only a fashion trend and the subject of populists’ juggling at various political talk shows.

'Dobrochesnist' in the Ukrainian context

The notion of 'dobrochesnist’ is quite new for Ukraine. Integrity in Ukrainian society and legislation is predominantly considered in the context of corruption prevention, as a possible positive outcome of applying rules and regulations. In the broader society there is currently no perception of integrity as a category of behaviour aimed at the public good. Ukrainian legislation – as inheritor of the Soviet Union’s legislation – often uses repression and coercion mechanisms, rather than norms of persuasion and incentives, which are more characteristic of the European legislation.

The semantics of the word ‘dobrochesnist’ also plays an important role in the perception of this notion in Ukrainian society. In the English language ‘dobrochesnist’ refers to “acting in accordance with relevant moral values and norms as described in chapter 2.1 of this manual (Huberts 2014). In Ukrainian, the word ‘dobrochesnist’ is made up of two different words – ‘good’ and ‘honest’. ‘Dobrochesnist’ characterises a virtuous person, one who lives honestly, and adheres to the rules of morality. The synonyms to this word found in various dictionaries are also of interest: virtue, honesty, morality, decency, well-doing. This being the case, ‘dobrochesnist’ is viewed as moral quality and virtue. In the context of the professional activities of public servants, ‘dobrochesnist’ can be explained as performing duties on the basis of proper treatment of those (citizens) who receive public services or are affected by public policy.

Integrity in the Law on Civil Service

The principle of honesty as one of the main principles of the civil service of independent Ukraine was first regulated by the Law of Ukraine On Civil Service as amended in 1993. The same law also spoke about the requirements regarding the ethics of civil servants: “A civil servant has to perform his / her duties conscientiously, treat citizens, managers...
and employees with respect; adhere to a high culture of communication and avoid actions and deeds that may compromise the interests of the civil service or negatively affect the reputation of a civil servant”.\textsuperscript{9} As we can see, the concept of ‘dobrochesnist’ was not yet used back when the Law on Civil Service was first implemented. Nevertheless, it emphasised the moral and ethical component of the activities of a civil servant and determined the manner and limits of his / her activities. In fact, public demand for civil servants acting with ‘dobrochesnist’ was always there. The term ‘dobrochesnist’ was introduced and standardised in the new Law On Civil Service as revised in 2016.\textsuperscript{10} Article 4 of the Law mentions that integrity is a basic principle of the civil service. It links integrity to "civil servants’ commitment to protect public interests and reject the prevalence of private interest while exercising powers granted to them”. Thus we see that emphasis is placed on conflicts between private and public interests. However, the Law does not mention that behaviour must stem from an inner conviction (value) to do the right thing for the common good. The authors of a scientific practical commentary on the Law believe that ‘dobrochesnist’ is a key condition for preventing and countering corruption.”\textsuperscript{11} Moreover, they say it is a key principle in preventing conflicts of interest and ensuring the implementation of instruments aimed at preventing corruption in the civil service.

**Promoting integrity: different instruments**

Financial control is one of the tools Ukraine uses to measure the level of civil servants’ integrity. In 2015, a unified state register of declarations was launched, in which civil servants must declare income, expenses and their financial liabilities. This fact is of great significance since it provided citizens with an opportunity to access information on the financial condition of public servants, whose activities are financed by tax payers. This has greatly enhanced the transparency of civil servants’ activities. Also, one of the main objectives of this instrument is to prevent possible conflicts of interest. Meanwhile, a lot of awareness raising activities and campaigns have been implemented both by international organisations and by institutions such as the National Agency for Cor-

\textsuperscript{9} https://zakon.rada.gov.ua/laws/show/889-19
\textsuperscript{10} Науково-практичний коментар до Закону України “Про державну службу” / Ред. кол.: К.О. Ващенко, І.Б. Коліушко, В.П. Тимощук, В.А. Дерець (відп. ред.). – К., 2017. – С. 628 public.nazk.gov.ua
\textsuperscript{11} https://zakon.rada.gov.ua/laws/show/z1203-16#Text
ruption Prevention, to explain the damaging consequences of a conflict of interest and how to prevent a conflict of interest.

Ukraine has a Code of Ethical Conduct for civil servants working on the national level and local government officials. Developed in 2016 by the National Agency of Ukraine on Civil Service, ethical conduct described in this code is based on the principles defined by the Laws of Ukraine “On Civil Service” and “On Service in Local Government”, as well as general requirements for the conduct of civil servants in the law “On Prevention of Corruption”.

Furthermore, as part of the action plan to implement the Association Agreement between Ukraine and the EU, Ukraine has been working on reforming its public administration. Bringing legislation for the civil service in line with European principles, is one of the activities of the Action Plan. One of the main principles of the new civil service has been ‘dobrochesnist’.

Finally, in January 2020 a new law to protect whistleblowers came into force. The new “Whistleblower Law” should protect whistleblowers who report possible corruption or corruption related offences and provides financial rewards to whistleblowers for corruption reports where the damage to the state is more than UAH 10 million (appr. EUR 310.000). The main objective of the law is to fight corruption. Yet it also contributes to enhancing ‘dobrochesnist’ among civil servants by providing them with anonymous reporting channels and protection. Institutions including law enforcement agencies that fight corruption and public law organisations must now establish protected anonymous reporting channels.


Literature


