

## **National Integrity System Assessment (NISA)**

### ***How Do We Know if It's Working? Activities and Criteria for Assessing the Consequences of Integrity Institutions, Policies and Reforms***

Dr John Uhr

Senior Fellow, Political Science Program, Research School of Social Sciences,  
Australian National University, email [John.Uhr@anu.edu.au](mailto:John.Uhr@anu.edu.au)

*Paper for Australasian Political Studies Association, Adelaide, September 2004*

#### *Abstract*

Good governance requires proper assessment, and reforms aimed at promoting integrity and countering corruption are no exception. Adequate approaches for assessing the impacts of integrity measures are an emerging priority in many countries. Indeed while it is important to establish whether integrity systems have sufficient capacity, and to understand whether they operate coherently, any ultimate judgment about their effectiveness hinges on how we judge their impacts, or 'consequences'. Efforts to assess the consequences of modern integrity systems are in a relative infancy; for example the OECD 'Trust in Government' report (2000) identified the lack of impact assessment as the weakest point in anti-corruption efforts. This paper argues that an empirical and evidence-based approach to assessing the overall impact of integrity and corruption prevention measures is possible, based on experience in Australia, drawing on measures including the evolving State of the Service surveys of the Australian Public Service Commission. However, different types of measurement serve different institutional purposes, with little current integration and no overall agreed framework for how they might be combined to help judge performance. This paper identifies six key issues that need to be addressed in developing such a framework.

#### **1. Introduction**

*If individuals should act with integrity, and public office needs integrity, then managerial leadership and institutional design should aim to sustain it. ... No easy cost-benefit analysis justifies this central role of integrity. But I believe integrity anchors personal moral life, is true to the role of office in democracy, and results in better governance and higher quality of judgment and political life (Dobel 1999: 21).*

The search for best practice in integrity assessment is still in its infant stages as an analytical and academic exercise. This infancy highlights some of the great questions of our age – as Pat Dobel notes above, we live in an era of cost-benefit analysis, economic bottom-lines and objective indicators for monitoring what goes on around us in infinite detail. However when it comes to reassembling this knowledge into a holistic picture of quality of life, or in this case quality of governance, our methods often seem either clumsy or non-existent.

In an earlier paper in the National Integrity System Assessment series (Brown & Uhr 2004), we argued the importance of recognising the different objectives or drivers of assessing a national integrity system, and the different styles and problems of assessment methodology that hang off these different approaches. How and why we seek to describe integrity institutions and processes as ‘a system’, and how we then assess it, carry a range of different assumptions. We also already know these systems cannot be assessed in a vacuum – how they perform is dependent on their capacity (or resources), and on their coherence (or operational relationships). But once we establish the relative levels of capacity and coherence, and so understand how these systems are functioning, the fundamental question becomes: what are they achieving? Finally, integrity system assessment comes down to an understanding of the outcomes, impacts or ‘consequences’ of these important institutions and processes.

This paper sets out to highlight some of the key issues to be addressed in developing any framework for assessing the ‘consequences’ of integrity systems. Consequences certainly matter; and integrity systems that deliver only inconsequential outcomes (regardless of the weight of bureaucratic ‘outputs’ they might generate) deserve to be ranked low on the ladder of preferred systems. After some more background, the paper summarises four main categories of information collected in Australia which can help support judgments as to these consequences; in so doing, the paper draws on analysis developed for a parallel report to the OECD (Brown, Uhr et al. 2004). The paper then reviews the recent State of the Service reporting of the Australian Public Service Commission, as an example of how evidence-based methods of integrity system assessment are becoming more sophisticated, and providing lessons for the development of a more holistic picture of whether systems of ‘results-oriented accountability’ are working. Finally the paper suggests key issues to be borne in mind in devising a framework for integrating, simplifying and extending the variety of current or potential assessment efforts. While our project has identified a number of promising ‘best practices’ (or perhaps ‘better practices’) in the hard work of ‘doing’ of integrity assessment, we want to emphasise the importance of best practice in the even harder work of ‘theorising’ how this assessment should be undertaken.

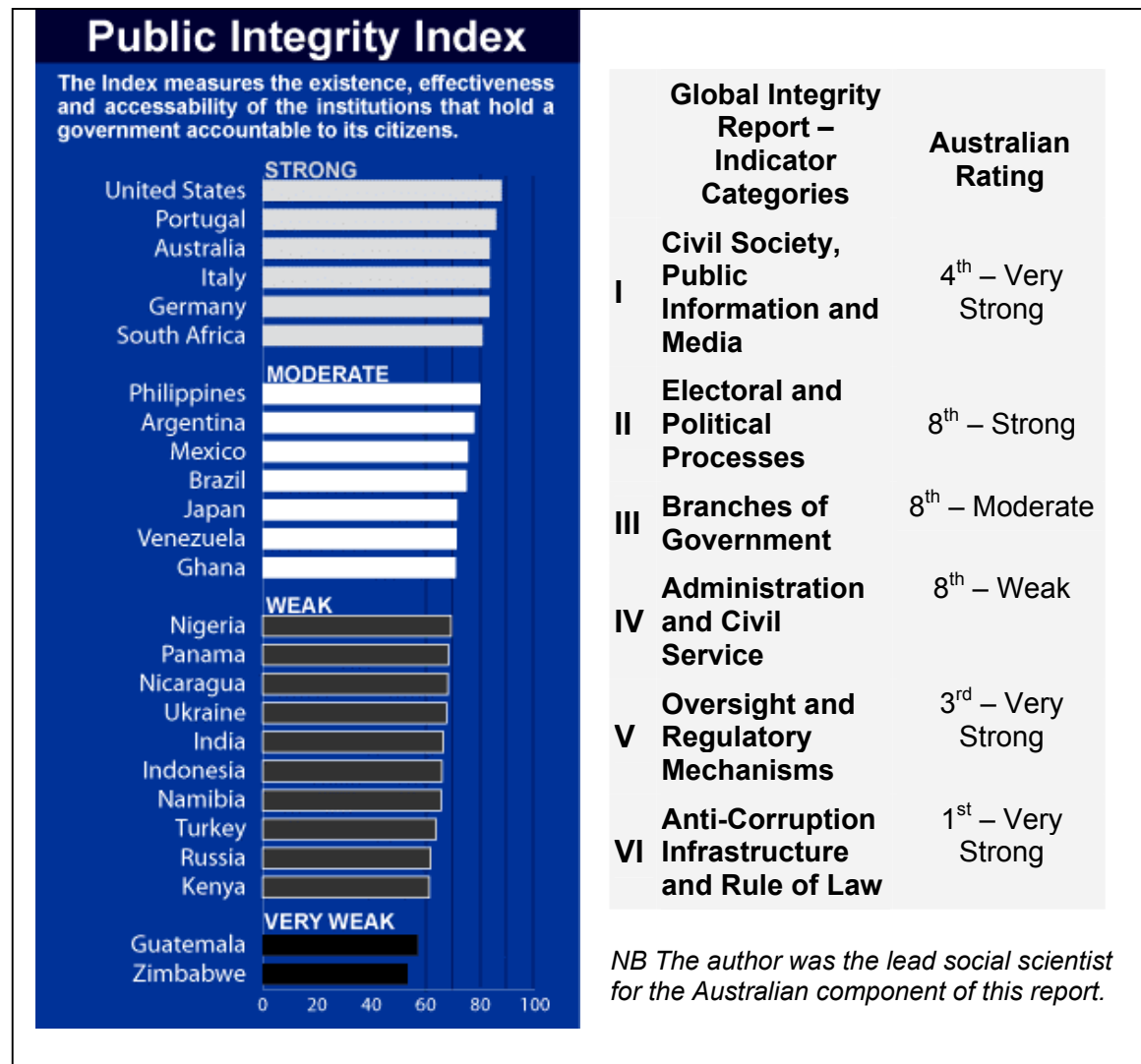
From the outset, it is worth noting that this discussion revolves around public sector and government integrity systems. The ambitious goal of the NISA project is to map and assess integrity systems as they relate to governance across all sectors of Australian society, including the private sector; and other papers are concerned with this. One of the major questions arising from the discussion here, is to what extent these activities for assessing integrity ‘consequences’ in the public sector compare or relate to the private or civil society sectors, but this must be left to another time.

## **2. Background: current efforts in assessing integrity system ‘consequences’**

Assessing the consequences of integrity systems is one area where theory currently falls far behind practice. Recently the preferred alternative seems to be the application of purpose-built cross-national assessment frameworks, like those devised by Transparency International and the Centre for Public Integrity. The former’s cross-national reports on corruption perception and experience are well known, and through

National Integrity System studies are now extending into more detailed institutional comparisons between countries, as discussed in the first paper (see Pope 2000: 36; TI 2001; Doig & McIvor 2003a; 2003b; Larmour & Barcham 2004; Roberts forthcoming). The Centre for Public Integrity's Global Integrity Report, first released in 2004 (Camerer 2004), also contains a highly structured cross-national analysis of 25 countries, including Australia (Figure 1). However both sets of approaches involve top-down efforts with some risk that distinctive national developments might escape attention and analysis. There are few precedents for comprehensive assessment or monitoring of integrity system performance from within individual countries, as highlighted by the OECD's current project on 'Developing Policy Assessment Measures for Integrity and Corruption Prevention Activities'. That project flowed from the fact that when OECD member countries were surveyed on their 'Ethics Infrastructure', responses on monitoring, performance and impact assessment were conspicuously weak (OECD 2000: 66-72).

**Figure 1. The Global Integrity Report Rankings and Australia (Camerer 2004)**



One important exception to this general lack of national assessment frameworks, is Glor and Greene's recent evaluation of what they call 'the evolution of ethical government' in Canada (Glor & Greene 2003; Greene & Shurgrman 1997). Glor and Greene construct a framework around democratic values of equality, testing the performance of public institutions against a grid of criteria including the impacts on formal equality (eg, equality of rules), social equality (eg, equality of condition) and finally integrity itself, by which they primarily mean impartiality in public decision-making.

This is a very promising assessment framework which has the advantage of being provisionally tested through a practical application to one national government, including a comparison of 'the view from within' (i.e., integrity assessments of internal watchdogs) and 'the view from without' (i.e., public attitudes)(Glor & Greene 2003: 56-59). However the Glor and Greene approach has yet to be tested against Australian developments. In fact, very few national evaluations have involved the application of assessment frameworks derived from evaluations in other national settings.

Our own approach to theory falls between these two extremes of uniquely-national and broadly cross-national approaches. Standing back from Australian practices, we have tried to construct an assessment framework with sufficient specificity to capture the Australian story but also with sufficient generality to be flexible enough for adaptation in other national settings. Like Glor and Greene, our starting point is constitutional in that we are trying to locate ethics and values in a constitutional setting. Admittedly, constitutional settings are flexible, responding to evolving political developments and changing community standards. But this focus on what US scholar John Rohr calls 'constitutional practice' is an important way of capturing the larger public purpose of administrative arrangements, including arrangements for evaluating the contribution of many different public organisations to the cause of public integrity (Rohr 1998).

For a variety of reasons, we hold that consequences are a good test case of any analytical framework. Trying to measure consequences brings into play many of the most pressing and practical issues facing policy makers.

### **3. Types of existing performance measurement**

Even if there has been, until now, no overall performance assessment framework for public integrity systems, clearly a wide range of information is collected and reported which bears on their performance in other ways. In assembling examples of this information for this project, and for the OECD (Brown et al. 2004), we identified that it tended to fall within or across four main categories of policy measure. More detail of the examples is provided in our report for the OECD; the aim here is to outline the different types, present in more detail the Australian Public Service Commission's efforts as an example of activity which cuts across at least two of these categories, and to identify key principles that have to be dealt with in developing a larger framework.

#### ***Implementation measures***

The first category of measures are directed toward major, one-off or occasional integrity initiatives, including legal and institutional reforms, and are intended simply to reveal whether agreed actions have actually been implemented. They represent a minimum type

of evaluation, since without them there is no evidence that political promises have been honoured or that legal reform is more than symbolic. Existing TI, CPI and many national efforts rely on a simple comparison of ‘theory’ and ‘reality’ as a means of cross-checking whether policies have been operationalised. However as we will see, there are limitations. Implementation measures may be occasional, rather than regular. They are not necessarily oriented to detecting when what was promised was itself defective. They can seek to measure the substantive outcomes of policies, as well as simply whether ‘the talk is being walked’ (as potentially is the case in the APSC example), but this is not guaranteed. Importantly, different assessment agencies also tend to assess implementation of different aspects of similar things – for example, a public service commissioner may monitor implementation of codes of conduct, an ombudsman may monitor implementation of internal complaint handling systems, and anti-corruption or fraud control bodies may monitor implementation of internal fraud control requirements. One of the key questions becomes whether there are problems of fragmentation or conflict, or advantages to be had from developing a common framework.

### *Activity & efficiency measures*

Activity and efficiency measures are directed towards more routine, ongoing integrity activities, such as the day-to-day operations of integrity bodies or ethics officers. These are more regular (usually annual) reports which describe whether agreed systems are functioning and providing basic value-for-money. They represent the most standard and consistent ways in which integrity activities are reported, usually in a manner consistent with performance reporting across the public sector. There is a natural relationship between many of these standard activity measures (such as ombudsman or court caseloads), and resource justification issues. However despite offering to provide objective performance measures, few of these measures actually provide information about the substantive quality of the activities concerned, as opposed to quantity and timeliness of the ‘integrity workload’ being handled. The measures stand as year-by-year guidance to managers but are rarely systematically analysed. Other current work in progress in Australia confirms this, in the specific area of performance indicators for police oversight agencies (Prenzler & Lewis 2004). Much current debate over what types of integrity institutions can, or should have what types of staffing and skills capacities, could also make better use of this basic performance information, as argued in another paper in this series (Brown & Head 2004).

### *Institutional effectiveness measures*

Our third category of measures are those efforts directed towards more holistic evaluation of the overall performance of particular integrity policies and agencies, or justifications for the creation of new ones, and tend to be more qualitative and political than anything in either of the first two categories. As such, they provide an integrative approach to assessment, but using wildly varying or opaque methodologies. Examples range from the performance auditing approaches of the Australian National Audit Office, when applied to integrity agencies or policies (e.g. Barrett 2004); to evaluations carried out by standing or one-off royal commissions (e.g. Weller 1994); to the various approaches used by the many

standing parliamentary committees in Australia, whose job is to oversight and monitor the performance of individual integrity agencies including the NSW Independent Commission Against Corruption, Queensland Crime & Misconduct Commission, and Ombudsmen. In 2003, these committees held their own first annual conference (WA Parliament 2003).

These approaches to judging institutional effectiveness tend to dominate final decisions about integrity reforms because they are closest to, or embedded in, the political process. However this also raises a variety of well-known problems, including the fact that may draw on information from any pertinent source, or on none. The question becomes whether there is significant potential for more structured evaluation processes, building on these approaches, by strengthening requirements for prior deliberation in turn informed by ‘objective’ performance reviews based on qualitative and quantitative evidence. Currently the great variability in assessment methods arguably fails to capitalise on the rich diversity of experience and innovation evident in Australian integrity programs.

### ***Outcome measures***

Last but not means least, a variety of assessment activities are, or could be, directed to measuring the substantive outcomes of integrity policies. The goals of integrity systems are to positively enhance ethical standards, corruption resistance, public trust, and in a constitutional democracy such as Australia, to enhance the quality of democratic life. These measures are less to do with the activity of ethics-promotion and anti-corruption work, than the actual level of integrity, ethical standards and corruption risk that is being achieved. They potentially have strong relations with other measures – for example, using staff surveys to monitor agency compliance with ethics reforms, can also be used as a barometer of the ethical standards and ethical culture of staff themselves (see below). Similarly, activity and efficiency measures such as caseloads, prosecution and conviction rates are used – albeit imprecisely and often inappropriately – as indicators of actual corruption and misconduct levels. The quest for substantive, qualitative and quantitative measures of ethical standards and corruption risk is in particular infancy, compared with standard public administration performance measures of implementation, activity and efficiency. The lead examples are the social science approaches being developed by the NSW ICAC and Queensland Crime & Misconduct Commission, which are also extending from surveys of public employees and managers, to public attitudes towards key elements of the integrity system. Much remains to be done to consolidate and develop these approaches; to link them with broader social science data on public confidence in institutions; and build these types of evidence-based techniques into a useful, agreed assessment framework.

## **4. A Case Study: State of the Service Reporting by the Australian Public Service Commission (APSC)**

More detail on examples from the above four categories can be found in the project team’s report for the OECD. However a good current example of integrity system performance assessment which spans more than one category, is the Australian Public Service Commission’s innovative ‘Values in Agencies’ project which drew upon surveys of

agencies and of employee attitudes to organisational policy and performance (APSC 2003). This project broke new ground in testing the realities of ‘ethics and values’ policy implementation across a diverse set of public agencies, partly in fulfilment of the Commission’s statutory responsibility to report annually on the ‘state of the public service’, and partly as an initiative in qualitative exploration of existing best practice.

The agency and employee surveys used by the APSC are primarily an implementation measure. They recognise that it is one thing to proclaim the right policy, and another thing to implement it. To its credit, the Australian government is trying to evaluate publicly the extent to which government agencies have ‘embedded’ into organisational practice the ethics and values promulgated in public law. This initiative is a major exercise in policy evaluation with considerable international significance. However the approach also generates substantive data on the ethical culture of organisations, and is thus an avenue to providing an ‘outcomes’ measure. In this it shares features with the Public Sector Profiling research of the NSW ICAC and Queensland CMC. The comments here are based on publicly reported results which themselves are preliminary and should be compared with future reports dealing with longer-term findings. For instance, national whistleblowing policies and practices have yet to be evaluated and are due for examination at a later date (APSC 2003: 33, cf 108-112).

### ***Role of integrity***

‘Integrity’ features prominently in this project. A general finding is that ‘embedding’ public service values into agency culture ‘requires an integrated approach’ by agencies (APSC 2003: 26), meaning that the *formal* commitment to integrity must be matched by a *substantive* commitment to integrate public service ethics into the operational values of agencies. As the Commission acknowledges, the worry about good policy words like ‘ethics’ and ‘values’ is that employees will fear that ‘the words stayed on paper and were not always translated into action’ (APSC 2003: 31). This matching of formal and substantive commitments is found in a three-part framework:

- ‘commitment’ to a ‘values-based culture’;
- management’ based on ‘good judgment and integrity’, where integrity refers to official probity; and
- most important for present purposes, ‘assurance’ that everyday practice matches authorised policy through appropriate ‘accountability and assurance mechanisms’ (APSC 2003: 27). This last element is basic because it drives the evaluation process from bottom to top so that the assessment reaches into the two elements of ‘commitment’ (to good policy) and ‘management’ (its effective implementation).

### ***General culture of the Australian Public Service***

True to their mission, the APSC’s employee surveys highlight gaps between policy and practice. Often these are only minor shortfalls between the intention of legislators and the performance of policy implementers, suggesting to the APSC that ‘there is clearly room for improvement’. For example, only 67% of agencies have conducted their own staff surveys over the past three years, despite the fact that employee surveys are basic to the assurance mechanisms now expected of public agencies (APSC 2003: 36). The latest figures also show that 20% and 28% of senior executive service employees report,

respectively, that their agency head had not communicated to them the ‘importance of acting in accordance of Australian Public Service (APS) values’, nor ‘the importance of developing in other staff an understanding of APS values’ (APSC 2003: 28).

These gaps highlight priority areas for renewed effort by public service management. But while they might be the most urgent areas for attention, they are not necessarily the most important. In other cases, the gaps are even more significant, reflecting larger or more serious shortfalls. For instance:

- although legislation requires that public employees must at all times behave in ways that uphold public service values and promote, in the words of the Commission, ‘the integrity and good reputation of the Service’, 47% of employees report that they have never participated ‘in training that included an emphasis on the APS Values’ (APSC 2003: 28-9);
- employees report rather low levels of confidence that ‘the most senior managers’ act in accordance with the APS Values: only 63% across the service (but ‘less than 50%’ in two large agencies), prompting the Commission to drive home the lesson of ‘the importance of senior leaders demonstrating visible and strong commitment to the APS Values’ (APSC 2003: 30);
- more than one-fifth of employees (21%) reported fears of potential ‘victimisation and discrimination’ if they initiated action against unethical conduct by more senior officers. Further, ‘more than 30% of agencies’ appear to have no procedures to make employees aware of whistleblowing mechanisms (APSC 2003: 34, 36).

The Commission draws the lesson that agencies with ‘sensitive relationships with clients and stakeholders need to promote the Values more firmly’, which might well suggest that among the most vulnerable public service values are those relating to *public* responsiveness when, for example, dealing with citizens.

### ***Functional and operational areas***

In these areas, where public service agencies face the greatest challenges to maintaining ethics and values, the APSC’s reports add immensely to our knowledge of the theory and practice of public integrity. For present purposes, one functional area stands out: relations between public servants and elected politicians in government and parliament. The relevant chapter of the most recent *State of the Service Report* notes two important developments:

- The persistent interest by parliamentary committees in the state of relationships between the public service and the political executive, exemplified by two recent Senate inquiries into the role and performance of ministerial officers as an important linking mechanism;
- Apparently unrelated, the steady decline in the use by public service agencies of formal evaluation measures for services to ministers – at a time when agencies are increasing their use of quality control measures for the same ministerial services. Disturbingly, this comes at a time when agencies are decreasing their reliance on training of staff on managing the parliamentary relationship (APSC 2003: 37-39, 45-6).

The Report wisely makes no comment about any connection between these two political developments, leaving others to speculate about the relevance of this to wider public debates over allegations of ‘politicised’ public service either at the hands of the political executive or indeed the hands of parliamentary inquiries. But it is worth recording the extent to which public service agencies operate under political control, typically justified in terms of the underlying Australian values of responsible parliamentary government which set limits to the freedom of movement that agencies have in managing ethics and values. Public service organizations cannot invest in administrative excellence without reference to political feasibility; and the other side of the relationship is that elected politicians can not, or at least should not, invest in policy initiatives without reference to administrative feasibility.

A test of the integrity of public service-political relationships is the quality of the relationship between an agency’s staff and its minister and ministerial staff. The problem is not so much that public servants face political pressure but that public servants do not know what guidance their agency has to help manage that inevitable pressure. Agencies can let their own staff down by not equipping them with support about how best to manage the policy process consistent with public integrity. The evidence from staff surveys is that sizeable proportions of employees are unaware of agency protocols for dealing with ministers and their offices (eg, minimum classification levels for signing off briefs, for phone contact, for oral contact, for file notes, for email communication). Of particular concern is the high proportion of employees unaware of protocols for resolving uncertainties about inappropriate relationships with ministerial offices (APSC 2003: 39-42). It appears that similar concerns might be evident in the broader relationship between public service and parliament, given that ‘just over a third’ of senior executive service employees report that they have never participated in any ‘training in accountability, rights and responsibilities to Federal Parliament at any time’. To its credit, the APSC notes that this attitude not only contrasts but conflicts with attitudes from relevant parliamentary committees, particularly the Senate Finance and Public Administration Committee (APSC 2003: 46-47).

### ***Results and lessons***

What does the above tell us about government and public integrity? The Australian government is taking seriously the contribution that internal staff surveys can make to measuring gaps between the promise and performance of a culture of integrity across the public service, showing that:

- it is misleading to think of one homogeneous administrative culture in any system of national government – the surveys demonstrate the range of variation in administrative cultures across government;
- organizational leadership matters: the qualities most valued in public service agencies are best seen in those leadership teams attracting the most positive public attention for their contribution to good government; and
- little of this would be properly known but for a commitment to continuous evaluation, using a battery of instruments from the agency-specific to the system-wide to investigate the real character of integrity within government.

However it is worth reflecting on possible lessons of the 2003 study, not to undermine that it currently represents something close to Australian 'best practice', but to stress the conceptual and practical challenges of using such efforts to inform a larger integrity assessment framework. The 2003 Report reflected the first time that the APSC had conducted extensive surveys of stratified samples of individual agency staff, in addition to agency heads / corporate management. As a result, it was pioneering, and subject to normal teething problems already taken into account for the 2004 study.

One significant lesson is that the approach focuses strongly on some dimensions of integrity, or values-based governance, but not necessarily others. The strong focus is on the role of leadership, management and agency policy in the embedding of values, with less information about the roles of formal systems including regulatory and oversight bodies (for example, internal and external administrative review systems, audits, Ombudsman complaints or similar) in ensuring that public sector agencies are 'managing for outcomes' with integrity. The former is more related to a 'carrot' approach to organisational behaviour, as against the use of 'sticks'. As they currently exist, employee surveys assume that core values including integrity can and should be embedded primarily by way of leadership, and accordingly this is primarily what is measured. However useful data could perhaps also be collected on the influence of formal sanctions (or indeed, formal incentives) on how managers and employees perceive their responsibilities. This conceptual separation between different models/themes of integrity is not unusual, as we discussed in the first paper, but this is an interesting tangible example.

A second lesson is the way in which the APSC research and reporting tends to reflect structural or institutional divisions within government, that tend to divide public integrity into different operational segments. For example, while the employee surveys do not examine the role of formal sanctions and incentives in the embedding of values, as an implementation measure the APSC does report on the sanctions exercised by agencies. Thus we know that in 2002-2003, Australian Public Service agencies terminated 70 officers, undertook 28 demotions and carried out 359 reductions in salary or other sanctions in response to breaches of the APS Code of Conduct (APSC 2003: 103ff). However this does not necessarily provide a full picture of the sanctions exercised over federal public officials or indeed whole agencies, as a measure of integrity performance in the reporting period. This is because criminal offences such as fraud and bribery are unlikely to be handled as mere breaches of the Code, but rather reported to the Australian Federal Police and investigated and prosecuted separately. Similarly, neither code breaches nor criminal statistics (if available) reflect the results of administrative review processes, which provide a highly relevant indicator of integrity levels in individual departments or divisions, but which are again reported separately.

A third lesson is that the type of data collection now going into APS State of the Service reporting has to be maintained, to become really useful in monitoring the success of integrity efforts. It is therefore worth noting that despite the successful results of the 2003 approach, the Australian Government is yet to fully commit to a long-term longitudinal program of comprehensive evaluation, with similar studies only currently guaranteed in 2004 and 2005. The government will thus face a decision as to whether or how to maintain this approach; a decision also faced at different times by those state governments that have pioneered similar research. It may that to survive and grow, such assessment

efforts need to become standard parts of the type of more coordinated, overall integrity assessment framework that governments can clearly recognise to be an indispensable and ongoing part-and-parcel of the business of government itself, rather than simply a stand-alone, one-off initiative.

#### **4. Key Issues for the Development of an Assessment Framework**

In light of these particular lessons from the APSC's achievements, and the broader need for integration and reconciliation of the four categories of performance information outlined earlier, the key issue is how to develop an assessment framework that provides a holistic picture of whether integrity goals are being achieved. Obviously such a framework would benefit from being relatively simple, while not simplistic; and needs to be realistic in terms of the cost of assessment activities themselves. Assuming those practical considerations, however, the discussion so far suggests at least six conceptual issues also need to be debated and resolved for the design of an effective framework.

First, one of the most important issues for assessing consequences is the choice of benchmarks. This choice will highlight different consequences for 'constitutional government'. An assessment of consequences cannot get very far if it does not address appropriate measurement standards. Currently, the only clearly accepted quantitative measures tend to be those relating to activity and efficiency (number of cases handled and closed, at what rate). Thus, one of the most basic but uncertain problems for integrity assessment is the choice of a broader range of more qualitative standards, in a broader range of contexts, against which to measure performance. The need for benchmarks also further reinforces the need for governments to commit to long-term longitudinal research, since one of the most reliable standards is simply whether and why particular indicators might be changing over time.

Second, as we have seen, different assessment regimes assess different consequences. No review of competing assessments regimes can ignore an examination of the merits of different types of consequences. Indeed one way into the thicket of consequences is to relate actual consequences back to intended consequences, based on the intentions of assessors. However in turn, intentions must be related back to the institutional interests of those assessors, using 'interests' here in a conveniently neutral sense designed to bring out the institutional self-understanding of differently 'instituted' assessors. This aspect of self-understanding is a largely-forgotten element in the literature evaluating integrity systems, which typically evaluates according to some external blueprint which might – or more often might not – capture the inner dynamics at work in the real-life operations of integrity institutions. Accordingly, the 'consequences' assessed by particular institutions will vary depending on the 'interests' of those institutions, which can also change over time, reflecting the changing priorities of successive leadership teams.

The third issues, closely related, is that different assessment institutions approach the task of integrity assessment with different sets of expectations. The fact that institutions share a common task – loosely: performance assessment – does not mean they expect to drive that task in the same or even similar ways. For example, internal and external assessors approach the assessment task with different expectations; and in turn, these two categories

of 'internal' and 'external' span a wide range of different types of institutions, each with its distinctive approach and set of expectations.

For example, the 'internal' category ranges from the self-assessment of individual officers (relevant when reporting on aspects of their own conduct for the purposes of performance reporting) through the various forms which agencies might assess their own performance (from general annual reports to specific reports on particular aspects of public service) down to the many types of service-wide self-assessments orchestrated through the central co-ordinating agencies, again with varying degrees of critical independence exercised by central agencies. The 'external' category ranges equally widely, overlapping with the 'internal' category at certain points. What might seem an internal assessment to some observers can just as understandably seem an external assessment to others. For instance, internal audit plays a major role in supporting integrity within government and opinions inevitably differ about whether 'internal audit' is basically a part of internal management or of external review or indeed of both. So too, external or 'independent state audit' can be seen either as arms-length external accountability or as an internal partnership with decision-makers, or both. The point is that these conflicting perspectives reflect the importance of the leadership orientation of the officials in charge of, for example, audit agencies: the same institutions of audit assessment can function as internal or external assessors or some combination of both, depending on the sense of professional responsibilities of those leading the assessment.

Fourthly, these differing expectations and relativity of standards highlight the further complexity of measuring integrity when the core business of public administrators is itself never fixed, but rather is about the exercise of discretion. Listen to what governments themselves say is their core business, is vital to understanding the core issues of integrity systems. Here the APSC case study above is once again instructive. In describing the emerging public service model of values-based regulation, with a balance of (i) central legislation identifying the underlying principles of ethics and values and (ii) devolved administrative practices with patterns of responsibility varying according to the nature of the public business, the APSC notes that all this presumes that 'leaders must have the highest standards of integrity'. Without ethical leadership, public service values will die a death on the statute book. But leadership in ethics and values is easier to see than to plan for or program into operation; ethical leadership is not a compliance test, as though public service leaders simply had to ensure administrative compliance with a set of core values mandated in legislation. If only the pursuit of public integrity were that simple. Instead, public service leadership must meet a more challenging test which is to make progress in 'an environment where there are fewer rules and there is greater scope for discretion in decision making' by guiding employees 'to make the most appropriate decisions in all circumstances' (APSC 2003: 28-30).

In this context, growing interest in ethics, values and integrity is not concerned with hard and fast standards, but the need for frameworks of risk management suitable to public decision-makers. With fewer rules to guide or bind them, decision-makers have no real alternative but to use their own best judgment about what is appropriate in the circumstances. Among other things, they have to manage the risk to the public interest posed by the many calls on their attention. With fewer rules prescribing the manner and form of official decision-making, officials have to use their own responsibility to devise

appropriate processes that honour the spirit of the underlying public service values. But appropriate in what sense, we might ask? The answer turns on what we understand to be appropriate to the integrity of the decision-maker. As in the Canadian approach taken by Glor and Greene (2003), any overall assessment framework has to remove the false hope that one size fits all. Assessment of consequences should not be driven by mistaken expectations of uniform coherence across systems of government. The institutional diversity associated with constitutional checks and balances is one the basic democratic values acknowledged by Glor and Greene, with the lesson that the on-the-job integrity appropriate to one role in one institution will not be identical with on-the-job integrity in roles and contexts. Assessment frameworks have to be subtle enough to accommodate this diversity of public roles and offices, reflecting the range of legitimate functions performed by the many overlapping public institutions that make up ‘government’.

My fifth issue is the importance of the personal dimension to public integrity. At the end of the day, it is individuals and people that matter more than organisations and systems. Public services depend on the commitment of individual employees whose support for public integrity will be all the more enduring when it draws on and reinforces personal integrity. Many government assessment systems recognise the importance of clear standards of personal conduct, reinforcing our argument about the link between consequences and standards. An example is the July 2003 Australian National Audit Office (ANAO) 'better practice guide' on Public Sector Governance (ANAO 2003b). The first volume deals mainly with institutional framework issues, but the second volume deals more directly with personal dimensions, including an 'individual office guidance paper' followed by a guidance paper on 'potential conflicts' between official and personal interests. These papers demonstrate the importance of measuring consequences against appropriate standards, including the consequences of institutional performance against personal standards that are basic to 'constitutional government. The personal dimension is also prized by many public service organisations through award schemes for meritorious service or career achievements designed to honour their most valuable staff. Such prizes reflect integrity assessments at the most personal level. One might think that this would be the most subjective and contentious of all the exercises in integrity assessment, but it may be that these are among the least suspect forms of integrity assessment. One reason for this might be that these integrity awards force those who assess the claims of the potential awardees to integrate the public and the private – the job and the person, or the office and the officeholder – in ways that ‘cut to the chase’ and see the part that personal integrity plays in sustaining public integrity. The issue is how the integrity value of these existing personal performance measures can be enhanced in importance, and linked into a framework for assessing integrity systems overall.

Finally, when focusing on the consequences of integrity systems, we must include the consequences not just of those systems but of our assessment framework itself. That is, we must consider the impacts or outcomes of our assessment approaches for basic processes of constitutional government. This might sound too grand a consequence to measure public service ethics against, but the underlying analytical framework has to acknowledge the broader constitutional setting in which public service activities operate. As we have seen, alternative analytical frameworks focus on important but narrower organisational impacts, either for discrete public entities or for ‘the public service’ more generally. Valuable as these approaches can be, they may fail the overall ‘consequences’

test because they do not trace the trail of impacts back far enough, or take current public organisations as a given. In contrast, the orienting principle of a larger assessment framework must always be to evaluate integrity systems – institutions, policies or processes – as means to a larger end, which in the Australian case we might call, simply and no doubt misleadingly, ‘constitutional government’.

## 5. Conclusions

While the search for best practice in integrity assessment may still be in a relative infancy as an analytical and academic exercise, the Australian experience shows that there are, nevertheless, many different types of information collected in many different ways, all relevant to the performance of integrity systems. It is for this reason that we raise for further thought the larger implications of these often-unnoticed smaller exercises in integrity assessment. They include: implementation measures; activity and efficiency measures; larger institutional effectiveness measures; and outcome measures. The State of the Service reporting of the Australian Public Service Commission is perhaps at the leading edge, but is also hopefully typical of the growing sophistication of implementation and outcome measures in the integrity sphere.

Currently, however, the lack of an agreed overall framework means that the full value of efforts in individual areas is probably not being realised. The overall value of efforts to measure the ‘consequences’ of Australian public integrity systems is currently not likely to amount to something more, but rather something less than the sum of their many parts. The next challenge is to identify how a practical assessment framework might usefully adapt and integrate a variety of current performance measures into a simple, but comprehensive approach. The six issues outlined in the last part of the paper are intended to help in that process, recognising: the need for clarity in benchmarks; the different types of integrity currently targeted by different assessors; the different institutional interests of assessors; the fundamental reality that integrity is not fixed, but is all about discretion; the importance of the personal dimension; and the need to orient any overall assessment framework with explicit reference to its fundamental goals. Although it is possible to identify a number of promising ‘best practices’ (or perhaps ‘better practices’) in the hard work of ‘doing’ of integrity assessment, best practice in the even harder work of ‘theorising’ such an assessment remains just as important.

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