

**EMPOWERING ANTI-CORRUPTION AGENCIES:
DEFYING INSTITUTIONAL FAILURE AND STRENGTHENING
PREVENTIVE AND REPRESSIVE CAPACITIES**

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**Fighting Municipal Corruption:
The Problem of Finding Best Practices**

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INTRODUCTION⁺

All over the world, cities have been developing measures, instruments and institutions in order to curb corruption and to stimulate the ethics and integrity of government (Behnke & Maesschalck, 2006; Frederickson & Ghere, 2005; Lewis & Gilman, 2005). Many things happen, many lessons could be learned from experiences with these 'local integrity systems' (LIS). Nevertheless, the discussion about local systems has been limited and the attempts to compare policies and institutions are virtually nonexistent.

On the basis of portraits of the local integrity systems presented by the cities themselves and reflections on those systems by researchers, this book has shown what seven major cities have accomplished to fight corruption and to protect integrity. All were well developed economically. Although for all cities studied periodic corruption scandal or other integrity crisis triggered the city to take action, the approach taken in each differs. This will partly be due to differences in administrative heritage, which will limit the reproducibility of results in other cities. But this is not the case for all aspects of the integrity system and we therefore believe that cities in diverse settings can learn lessons from this analysis. What was also striking was that for all but one city, London, the local integrity system that was installed was locally determined and developed.

What is needed to come to more systematic analysis, however, seems to be a framework which includes the elements of a LIS system as well as the criteria to be able to evaluate its institutional performance. This concluding chapter presents a first attempt to come to such a framework. Based on the variety of systems and experiences we developed a framework with nine steps for a comparative assessment of local integrity systems (see Table 1). Having set out both standard descriptive and evaluative criteria for each stage of the framework, we are able to compare and contrast the city-by-city analyses that were presented in the previous chapters. This allows us, further, to abstract common problems that appear most often and those remedies that have proved most useful. We illustrate each step of the framework with the findings from the seven cities. An overview of the cities in our sample is given in the Introductory Chapter.

⁺ This paper will appear in similar form in Leo Huberts, Frank Anechiarico, and Frederique Six, eds.. *Local Integrity Systems: World Cities Fighting Corruption* forthcoming (May, 2008), BJU - Boom Juridische uitgevers, (The Hague, Netherlands).

Table 1: Framework for Local Integrity System analysis and assessment

Step	Description phase	Assessment phase
<i>A. Taking stock</i>		
1. Identify LIS actors	Description of current actors in LIS	<ul style="list-style-type: none"> . Are all ‘traditional’ actors present? If not, what explanation is given? . Are there any innovative elements in the LIS?
2. Determine regulatory context	Description of laws and regulations affecting LIS	<ul style="list-style-type: none"> . Does current LIS comply with all legal requirements? . Does current LIS go beyond legal requirements?
3. Determine scope: whose integrity?	Description of targeted populations	<ul style="list-style-type: none"> . Does it make sense to target these populations locally? . Are there populations that are not properly targeted anywhere (falling through the cracks)?
4. Determine scope: defining of integrity	Description of definition(s) used for integrity by actors in the system	<ul style="list-style-type: none"> . What is the justification for the chosen definition? . Are the chosen definitions accepted by stakeholders?
<i>B. How the system works</i>		
5. Position and role of Core Local Integrity Agency (CLIA)	Description of position, role and mandates of CLIA	<ul style="list-style-type: none"> . Is CLIA independent enough? . Does it have enough influence to make a difference?
6. Balance between compliance-based and value-based approaches	Description of the policies implemented for each targeted population	<ul style="list-style-type: none"> . Is a sufficient range of policies present? . Are the policies equally applicable to all targeted populations? If not, is that a problem? . How well are the policies implemented?
7. Balance between internal and external checks and balances	Description of checks and balances for each type of integrity violation and each targeted population	<ul style="list-style-type: none"> . For each targeted population, are there internal and external checks and balances for each integrity violation? Which gaps are there and how serious are they? Are there superfluous, redundant checks? . Are the actors cooperating and coordinating effectively?
<i>C. Performance</i>		
8. Political and public support	Description of available data, e.g. budgets, civic watchdog agencies activities, opinion polls results	<ul style="list-style-type: none"> . Is the political support for effective integrity policies strong and sustained? . How active or passive is the public support?
9. Effectiveness and efficiency	Description of available assessments and evaluations of (parts of) the system	<ul style="list-style-type: none"> . To what degree is the system actually succeeding in enhancing integrity (enhancing ethical standards, corruption resistance, public trust in institutions and the quality of democratic life)? . Is the system providing value for money? . Are the unintended consequences acceptable? And if not, are they properly mitigated?

1. Identify current LIS actors

As a first step of any comparative analysis and assessment of an institutional system we need to identify the actors currently present. This step is adapted from Pope (2000) as most often the actors present in a local integrity system will be similar to the pillars in Pope's temple approach. A comprehensive description of this approach is given in the Introductory Chapter, in which also an overview of the cities in our sample could be found. chapter.

In Table 2 we compare the presence of the relevant actors across the seven cities. In all seven cities executive, council and police and prosecutor are present and active in the field of fighting corruption and safe guarding integrity. Active, organized, citizen involvement is only present in three of the seven cities (Hong Kong, London and Hamburg). An independent integrity watchdog is only present in four cities (Hong Kong, New York, Sydney and Hamburg).

Possible questions that can be asked in the assessment phase are, are all the 'traditional' actors present? If not, what explanation is given? Are there innovative elements in the LIS? In all cities at least seven of the nine actors are present. Usually the active citizen involvement organization is missing or the independent integrity watchdog. When an independent integrity watchdog is missing, there is an internal core local integrity agency (London: Standards Committee, Amsterdam: Bureau Integrity and Antwerp: Bureau Integrity). And in both London and Antwerp, there are independent members from outside on the committee.

Sydney stands out for the fact that most of the policies and special integrity agencies are at the State level, not the city level. This has historic roots. Traditionally most authority has been at the State of New South Wales level and the city of Sydney's authority is fragmented over 38 local councils.

Hamburg stands out because it has an independent private integrity agency watchdog Pro Honore Association. It sees itself as an external 'fiduciary liaison body'. Pro Honore is primarily aimed at business sector integrity but it also investigates and evaluates complaints made concerning public authorities and, where appropriate, passes the case file on to the criminal prosecution authorities. Its other activities replace those of the local Ombudsman that is not present in Hamburg.

New York has an innovation that does not fit into the traditional pillars. It has integrity monitors by private actors that closely supervise the execution of city contracts by private companies that have had integrity problems in the past. Because of this history these companies should be banned from being awarded city contracts, but because of their good behavior of late and specific expertise, they are allowed contracts again with these special monitors. The monitors report directly to the city's core integrity agency, DOI, but are paid for by the contractors.

Table 2: Current LIS actors

City	Amsterdam	Antwerp	Hamburg*	Hong Kong*	London*	New York*	Sydney
Executive Council	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Police and prosecutor	Yes	Yes	Yes	Yes	Yes	Yes	Yes (State level).
Local ombudsman	Yes	Yes	No	Yes	Yes (regional level)	Yes (Public Advocate)	Yes (State level)
External accountant	Yes	No	Yes	(Yes) [For information, the Public Accounts Committee under the Legislative Council controls public funds]	Yes	Yes	Yes
Local auditor	Yes	Yes	Yes	Yes	Yes	Yes	No
Independent media integrity watchdog	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Integrity watchdog	No	No	Yes	Yes	No	Yes	Yes (State level)
Citizen involvement	No	No	Yes	Yes	Yes	Indirect	No

*

2. Determine regulatory context

What are the laws and regulations affecting the local integrity system? In all but one of the seven cities, no national laws or regulations were in place that require separate integrity agencies [Please see Para. 4 of our report on how Hong Kong operates under the “one country, two systems” principle enshrined in the Basic Law, the mini-constitution of the HKSAR.] Only in the UK was there detailed national legislation about the local integrity system: a code of conduct needs to be drawn up, a standards committee needs to be appointed at the municipal level and an ethics officer needs to be appointed within each department. In most cities national or state legislation prescribed the presence of an Ombudsman and in all cities there was national or state legislation detailing the need for some independent actor controlling the finances, be it an external accountant or a local Auditor’s Office. In all cities penal and administrative laws were in place against corruption, fraud and sexual harassment.

Questions that can be asked in the assessment phase are, does the current LIS comply with all legal requirements? Does the current LIS go beyond legal requirements? As far as we know all cities comply with legal requirements. Indeed, many cities go beyond legal requirements. For example, Amsterdam is leading the way in the Netherlands with its Bureau Integrity and system for reporting integrity violations.

Antwerp is also the first city in Belgium to have instituted a Bureau Integrity. London, however, is 'just' following national legislation, but that could be because the national legislation is quite detailed and far reaching as it is. The UK national legislation on local integrity systems is much farther developed than in the Netherlands or in Belgium. New York, long riddled with corruption scandals, is well buttressed with anticorruption rules and institutions that go beyond the national norm. The U.S. government sets two basic and influential requisites, first, through the ability of U.S. Attorneys to prosecute local corruption cases and second, through the requirement that local governments follow federally designated Generally Accepted Government Accounting Standards (GAGAS). [The Community Relations Department (CRD) of the HK ICAC is working on a number of public education programme that goes beyond legal requirements. For government departments, we have joined force with the Civil Service Bureau to launch a number of programmes to sustain a clean civil service. For instance, the Civil Service Integrity Programme (1999-2001), its sequel the Civil Service Integrity Entrenchment Programme (2004-2006) and the existing Ethical Leadership Programme (ELP) (2006 onwards). Under ELP, heads of bureaux and departments are invited to nominate a directorate staff to be their own ethics officer to promote integrity (*details about ELP, CSIP and CSIEP can be found in the file appended separately*). One of the key components of these programmes is to help government departments to formulate / review their departmental code of conduct to set the ethical standard for civil servants to follow. For the private sector, CRD has been helping listed and private companies, professional and trade associations, NGOs and schools to formulate and review corporate code of conduct. All civil servants are duty bound to report illegal and unethical behaviours encountered at work. We also encourage companies to include whistle-blowing in their code of conduct. The Hong Kong Ethics Development Centre, set up under the CRD in 1995, is tasked to help the private sector practice business ethics and professional ethics as the first line of defence against corruption. Our work goes far beyond merely abiding by the minimum requirement of the law.] The legal requirements for Sydney are to a large degree determined by the federal legal requirements set for integrity systems at the state levels. This does not leave much scope for extra activities at the local city level.

3. Determine scope: whose integrity is managed?

When designing a system that aims to fight corruption and safeguard integrity, an important question to address is whose integrity will be managed? There are many possible populations to target: civil servants, politicians, politically appointed officials, police officers, prosecutors and judges, corporate executives and citizens. For example, Hong Kong casts the net the widest as it also targets businesses and business executives (Table 3). All cities target at least local civil servants. Most cities also target politicians and politically appointed officials, although in many cities values of democracy and the right to stand for election often prevent effective measures, such as in Amsterdam. As in many jurisdictions, ethical values may be secondary to the value placed on electoral success.

Whether the local integrity system also includes the other possible agencies and functions often depends on what has already been put in place at the national or regional level of government (prosecutors and judges, corporate executives, citizens) or how different public functions are organised (police officers). For many cities public officials like the police are targeted by a separate integrity system and for most cities judges and prosecutors are usually targeted by watchdogs at the national level.

Hong Kong targets more populations than almost all cities in and out of our sample. However, Hong Kong's practice should not automatically be seen as the goal to achieve by all cities. For most other cities it makes more sense to manage the integrity of citizens or corporate executives at the national level. Why the exceptional choices made in Hong Kong? Probably because of its ambition to become a leading economic

and financial centre in East Asia as well as its history as a British Crown colony until 1997 and its special status as a Special Administrative Region of China since then. It therefore makes sense for Hong Kong to have a comprehensive integrity system at the local level. [HK’s anti-corruption legislation covers both the public and private sector from the outset simply reflected the strong political will and determination of the government to stamp out corruption holistically (i.e. through investigation, prevention and education), not because of our ambition to become a leading economic and financial centre in East Asia as well as our history as a British colony. (*For information, HK had bribery made an offence as early as 1898, with the enactment of the Misdemeanours Punishment Ordinance (MPO). The MPO was replaced in 1948 by the Prevention of Corruption Ordinance (POCO), the predecessor of the existing Prevention of Bribery Ordinance which came into effect since 1971, before the establishment of the ICAC in 1974*). We deeply understand the “knock-on” effect of corruption in both sectors. HK’s unique situation calls for putting corruption in both the public and private sectors under the same scrutiny. The fact that the existing anti-corruption legislation has been in force since 1971 indicates that our status as a special administrative region of China is not a factor in having a piece of legislation governing corruption in both sectors..]

What we find included in a local integrity system depends on two fundamental issues: (1) what is feasible and acceptable politically and (2) what makes administrative sense. For example, in Australia, much of the administrative authority has historically been placed at the State level, hence the strong institutions of ICAC, Ombudsman, Auditor’s Office and Police Integrity Inspector at the State level. Leaving relatively little need for separate local systems for Sydney.

Possible assessment questions are, does it make sense to target these populations locally? Are there populations that are currently not properly targeted anywhere, in other words, are there populations that are currently falling through the cracks? At first glance, all relevant populations within each city appear targeted at some level. As mentioned in the chapter on Amsterdam, within that city the system for targeting politicians and politically appointed officials is relatively weak in practice, as it relies heavily on self-regulation within the political parties; the Bureau of Integrity is part of the administrative system and therefore has no jurisdiction over the politicians or politically appointed officials. The question is, however, how long this discrepancy between administrative and political officials can continue to exist. Other cities, in particular ones with independent core integrity agencies (Hong Kong, New York, Sydney), have much stronger powers to hold politicians and politically appointed officials accountable for their actions and where appropriate sanction them. London’s Standards Committee also has the power to sanction these officials. Assuming that politically appointed officials set the example to civil servants, it could be argued that targeting both is of strategic importance for a cities integrity system. That is, if politicians make exceptions for themselves, it damages the credibility of the whole system.

Table 3: Whose integrity is managed by LIS?

City	Amsterdam	Antwerp	Hamburg	Hong Kong	London	New York	Sydney
Civil servants	LIS	LIS	LIS	LIS	LIS	LIS	State level
Politicians and politically appointed officials	LIS	LIS	Nationally	LIS	LIS	LIS	State level

Police officers	Separate police system	Separate police system	LIS	LIS	LIS	LIS	State level
Prosecutors and judges	Nationally	Nationally?		LIS? (Yes)	Nationally	Nationally	State level
Corporate executives	Nationally* & self regulation	Nationally* & self regulation	Nationally	LIS	Nationally	Nationally*	Nationally*
Citizens	Nationally	Nationally	Nationally	LIS? (Yes)	Nationally	State and Nationally	State

* The LIS does cover business corporations seeking city contracts or when public officials are involved.

As indicated, one of the dimensions of local integrity systems that varies in very interesting ways is the extent of the system's coverage, that is, who is subject to the rules, regulators and laws entrusted to various parts of the LIS? Perhaps the most significant development in this area is the movement of the LIS into the private sector. Many systems, Amsterdam and New York, prominently have long included private companies doing business with local government. Basic procurement regulation is not new and is followed by all cities here at least through the tendering process. However, Hong Kong has begun moving into the enforcement of rules and regulations put in place by government to protect the public from corruption in the private sector. [This might not be correct as mentioned previously, since our inception, we have already adopted a holistic approach of fighting corruption through investigation, prevention and education which covers both the public and private sector.] These protections do not necessitate a direct, procurement-like, connection between the private entity and the government, but the basic existence of a regulatory regime. Banks and manufacturers, it is argued are responsible for a significant element of the trust invested in the local economy and political structure and thus must be held to account. Again, for reasons mentioned above, enforcement of such regulations is done on the state/provincial or national levels in other systems. The fascinating thing about Hong Kong is how these added authorities influence the work and political standing of that City's Independent Commission Against Corruption. [We do not understand the text in red. Please let us know if you need us to furnish further information for your reference]

4. Determine scope: defining integrity

The next question to address is, what a LIS system manages, i.e. how integrity is defined? Is it merely the absence of corruption, fraud and theft or is a broader definition applied?

We prefer a definition and interpretation that goes beyond bribery but is specific enough to be limited to relevant violations of moral values, norms and rules. Table 4 presents a typology of integrity violations or forms of public moral misconduct. Nine types are distinguished. For every type of integrity violation, more and less serious forms of behaviour can be distinguished. For corruption such as bribery, the amount of private gain or money involved can vary from small potatoes to billions, and also the importance of the decision that is taken can differ enormously (from doing a friend a favour with a bit of information, to policies and projects with disastrous economic consequences for large populations). And sexual harassment, for example, can vary from a sexist remark to rape.

The typology indicates that integrity or morally appropriate behaviour means much more than not being corrupt (even though corruption is no doubt a crucial aspect of integrity). In all cities the problem is nowadays defined more broadly than pure

corruption or fraud and includes many of the elements in Table 4. But differences across cities do exist.

Having determined the definition in use, possible complementary assessment questions are: What is the justification for the chosen definition? Is the chosen definition accepted by stakeholders?

Most cities cover all or nearly all types of integrity violations. However, a more nuanced approach than allowed by our data is needed to investigate how local definitions of integrity are constructed and to what degree these are supported by stakeholders.

Table 4 focuses on possible integrity violations. In the Amsterdam chapter some concern was raised about the far reaching definition of integrity as professional responsibility. Even when we are limiting ourselves to the behaviour of public officials (instead of also incorporating policies; Adams & Balfour, 2004), there are a lot of bureau pathologies, as Caiden (1991) convincingly stated. However, not all of these should be considered integrity violations. To put it simply: an employee can do something wrong, can make mistakes, even stupid mistakes, without committing an integrity violation. When this distinction is blurred too much, an organisation loses sight of what is morally important and what is not. Such a blurring can have very negative consequences. Employees become too afraid to take risks or innovate and may become paralysed, by the idea that making a mistake will lead to an investigation questioning their integrity.

Table 4: Scope of integrity definition; violations covered

City	Amsterdam	Antwerp	Hamburg	Hong Kong	London	New York	Sydney
Corruption: bribing	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Corruption: nepotism, cronyism, patronage	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Fraud and theft	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Conflict of (private and public) interest: gifts, jobs	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Improper use of authority	Yes	Yes	Yes	Yes? (Yes)	Yes?	Yes	Yes
Misuse and manipulation of information	Yes	Yes	Yes	Yes? (Yes)	Yes?	Yes	Yes
Discrimination and sexual harassment	Yes	Yes	Yes	?(Yes)	?	Yes	Yes
Waste and abuse of resources	Yes	Yes	Yes	Yes? (Yes)	Yes	Yes	Yes
Private time misconduct	Yes	Yes	No	Yes	?	Yes	Yes some

5. Deciding the position and role of the core local integrity agency

In all cities a core local integrity agency was founded when the decision was made to tackle corruption and safeguard integrity. The position and role of this core local integrity agency varies substantially, as does the size and budget (Table 5). For example, in London and Antwerp the core agency is a commission consisting of

internal and external members meeting regularly. Its members' role on the Committee is part-time. In Hong Kong, New York and Sydney/NSW the agencies are independent institutions that are external to the local administration (New York's less than Sydney/NSW and Hong Kong). The full-time commissioners in Sydney/NSW and Hong Kong are appointed by special procedures to safeguard their independence from the political and administrative systems. In Amsterdam and Hamburg the agency is internal to the local administration.

The Hong Kong ICAC has about 1300 employees while Antwerp's Bureau Integrity has no dedicated officials; all are part-time working for the Bureau with responsibilities elsewhere as well. In 2006 Amsterdam's Bureau Integrity has 13 members of staff. London's core integrity agency, the Standards Committee, has no full-time dedicated members, but within each department within the city's administration ethics officers are assigned also.

The powers of the core agency vary as well. In Hong Kong the powers are far reaching and combine preventive and repressive powers in one and the same agency. The Hong Kong ICAC has cells of its own to lock up suspects.

In the City of Amsterdam the primary responsibility for the management of civil servants' integrity lies with line management, both in terms of preventive responsibilities as well as repressive responsibilities and authority. The core agency's role is to provide expert support to line management, if requested (both preventive and repressive), maintain a central database of reports of all integrity violations within the City, and ensure similar treatment of similar cases of integrity violations across the board. In contrast with London's Standards committee and the New York DOI, it has no authority to start independent investigations nor can it apply sanctions.

So, is the core integrity agency independent enough? Does it have enough influence to make a difference? In Hong Kong, New York, Sydney and London most people appear to agree that the agencies are sufficiently independent. The system in Antwerp is too recent to be able to judge. In Amsterdam, even though the agency is internal to the administration, with regard to civil servants' integrity it sees itself as sufficiently independent. This self-image is supported by the view of other actors but some doubts have been raised as well. The Bureau can however, not investigate or sanction politicians or politically appointed officials. Other elements of Amsterdam's LIS are geared to dealing with that population, albeit weakly. This is a serious disadvantage in comparison to a number of other cities.

Table 5: Position and role of core integrity agency

City	Amsterdam	Antwerp	Hamburg	Hong Kong	London	New York	Sydney
Name	Bureau of Integrity	Bureau of Integrity	Department of Internal Investigations (DIE)	Independent Commission Against Corruption (ICAC)	Standards Committee (SC)	Department of Investigation (DOI)	Independent Commission Against Corruption (ICAC) New South Wales
Internal or external to city administration	Internal	Mixture of internal and external	internal	external	Mixture of internal and external	Internal with special protections	external
Commission or organization	Organization	commission	organization	organization	commission	organization	organization
Established	2001	2004	1994	1974	1999?	1870	1988
Size of staff (2006)	13 staff	9 committee members	Nearly 60 staff	1345 staff	10 committee members	290 staff	105 staff
Size of budget (2006) in US \$	€ 1,5 million	No autonomous budget	?	HK\$ 669 million (US\$86 million) (0.3% of the total budget of the HKSAR Government)	?	US\$ 22 million	AUS\$ 16 million
Powers (investigation, adjudication, sanctioning)	Expert centre to line mgt; can investigate	None	Limited to criminal investigations	Investigation; prosecution with DoJ, sanctioning by court	all	Investigation; prosecution with state and national authorities	Investigation and naming; no prosecution.
Prevention activities	Expert to line mgt; can help with training, codes, advice	code, advice	Early detection systems, training, advice	Target-based corruption prevention public education programmes and ethics promotion	Training, code, advice (guiding),	Early detection systems, training, advice	Advisory , code

programmes for all
walks of life which
cover training,
code, advice
(guiding)seminars
/ workshops and
various integrity
projects to enlist
public support to
the fight against
corruption and to
develop the
positive values of
students, from
kindergarten to
post-graduates.

6. Balance compliance-based and values-based approaches

The literature on public ethics or integrity management appears to agree that integrity systems should have elements that are compliance-based as well as values-based (Cooper, 1998; Gilman 1999; Maesschalck, 2005; Paine, 1994). All cities have a combination of the two approaches as part of their local integrity system, but with different emphases. And with different actors performing different roles.

The values-based approach involves integrating integrity into human resources management, creating an ethical climate, drafting a code of conduct, providing employees with moral awareness training, including integrity indicators in performance measurement systems and the like. The role of leadership setting the example is also often stressed (Trevino and Nelson, 1999).

The compliance-based approach stresses the compliance to clear rules and procedures. Procedures are set and formulated, monitoring systems for detecting violations are implemented and specific actors are given explicit investigative powers to investigate allegations. The same or other actors may be given the power to adjudicate and yet others, or the same, are given sanctioning powers. The investigation, adjudication and sanctioning powers may be given to internal actors, such as line management, and/or given to external actors, such as Ombudsman, external independent integrity agency or Auditor's office. The judiciary system with the police, public prosecutor and judge are nearly always in place to investigate and possibly sanction breaches of laws.

Observers have often stressed that the same actor should not perform preventive and repressive activities, because of potential harm to agency effectiveness. However, at present in several cities, such as Hong Kong, the core agency combines both activities and seems to be able to cope. A possible explanation for Hong Kong ICAC's ability to combine the activities is the size of the organization (1345 employees in 2006) which allows clear separation of tasks into different departments. [We put repressive and preventive education at the same time was not because of our size but because we firmly believed, from the very outset, in the effectiveness of the three-pronged approach in attacking corruption from its root causes.] Another factor may be the widespread support among citizens and officials for ICAC's role. Also, ICAC investigates, but does not prosecute. The success of the Hong Kong's ICAC success may be attributed to its three-pronged strategy of strict law enforcement, prevention and community education, together with strong political determination (See Cheung's evaluation in this volume).

Most cities have whistleblower policies, to protect whistleblowers from potentially revengeful superiors and colleagues. This is meant to stimulate them to come forward and report any wrongdoing they have observed. New York has gone one step further as 'every employee of the City has an affirmative obligation to report to [the City's core integrity agency] any possible corrupt activity' (See Gill Hearn, this volume). New York has another innovative policy, regarding contractors. Most cities have policies to ensure that only companies of integrity are awarded city contracts. Triggered by the urgent need for competent contractors on Ground Zero after 9/11, New York implemented a policy of private integrity monitors. Contractors who have had integrity problems in the past and were therefore banned from City contracts can be awarded city contracts again if they can demonstrate that, with close supervision, they can be relied upon again. The supervision is provided by private integrity monitors who report directly to the NYC DOI, yet are paid for by the contractors.

Overall assessment questions concerning integrity management are: Is a sufficient range of integrity policies present?; Are the policies equally applicable to all targeted

populations? If not, is selective application a problem?; How well are the policies implemented? On paper Hamburg has a range of policies similar to most other cities. However, in practice the prevention side of the policies has not yet been implemented. Antwerp's integrity system is so recent and its policies too, that many have not yet been implemented properly.

7. Balance internal and external checks and balances

Related to the balancing challenge of the values-based versus compliance based approach is the challenge of balancing the internal and external checks and balances. When too much emphasis is placed on external checks and balances the system runs the risk of reducing the values-based incentives. The ideal is that the checks and balances internal to the line organisations are such that the external watchdog agencies do not need to take corrective action. Yet they are still needed. Sampford et al. (2005) refer to the different models for guardianship and accountability. Traditionally a fiduciary conception of guardianship and accountability was commonplace for organizations in general. For integrity systems, be it at the national or local level, an interdependent model appears more appropriate. Each guardian watches over other guardians. Sampford et al. (2005: 98) found support for this model in the Australian NISA study, '[e]ach step of the Australian assessment has confirmed the growing importance of these cross-checking relationships'. Studying the interrelationships in New South Wales (NSW, Australia) with network analyses, Smith (2005) found that the three most central agencies were the NSW ICAC, the NSW Ombudsman and the NSW audit office. Each of these three agencies was highly interdependent with the other. This triggered the Australian NISA research team to propose the new bird's nest metaphor instead of the Greek temple metaphor proposed by Transparency International.

[HK has effective integrity and governance systems, a key element of which is an elaborate system of checks and balances among the various organs of government, coupled with monitoring by vigilant watchdog institutions, an active civil society and critical media. Operating within the macro environment is a dedicated and independent anti-corruption agency which adopts a holistic approach to anti-corruption, encompassing law enforcement, prevention and education. Details please see the full report. A gist is at Para. 7.]

As one of the watchdogs, the ICAC has put in place a comprehensive system of checks and balances. Details please see Paras 64 – 66 of the report.]

Therefore, questions that can be addressed in the assessment phase are, for each targeted population, are there internal and external checks and balances for each integrity violation? Where are the gaps and how serious are they? Are there superfluous, redundant checks? Are the actors cooperating and coordinating effectively? To address these questions in detail for all seven cities will require further research. However, we can illustrate the power of this analysis by showing the results for the Amsterdam LIS (Table 7). This analysis shows that for civil servants no internal checks existed until the Bureau Integrity was established in 2001. For politicians and politically appointed officials no internal checks exist and for some types of integrity violations external checks are weak.

[HK has in place a system of checks and balances on our civil service and politicians. Please refer to Paras 19 – 23 (for civil servants); Para. 18 (for politically appointed Principal Officials (POs)); Para 36 (for Legislative Council Members); Para 42 (for District Council Members). Further, all public elections including elections for the

Chief Executive, Legislative and District Council elections are governed by the Election (Corrupt and Illegal Conduct) Ordinance (Paras 44). Anyone with a criminal conviction in the past five years cannot stand as candidates in public elections. Incumbent members with a criminal conviction (one month for Legislative Council Members and three months for District Council Members) will be disqualified.

8. Gain and maintain political and public support

What is being done to gain and maintain the political and public support for the local integrity system? This is important for the legitimacy with which the agencies within the system can operate and in particular the core integrity agency. Political support is important to maintain budgetary outlays and public support is important to maintain legitimacy.

What was striking for the seven cities studied was that in each, although in a totally different period in history, a large scandal was the trigger to get the issue of fighting corruption and safeguarding integrity on the public and political agenda. At the time of founding the system, in particular the core local integrity agency, the scandal had triggered the necessary political and public support. Information about the actual support for the integrity issue can also be obtained by a close consideration of changes and possible cuts in LIS budgets, the activities of civic watchdog agencies, and results from opinion polls (Uhr, 2005).

Additional and useful questions that can be addressed in the assessment phase are: How strong and enduring is the political support for effective integrity policies? How active or passive is the public support?

Not much research has been done in the cities to track political and public support systematically, with the exception of Hong Kong where for the past 15 years annual opinion polls gauge public views on corruption and the work of the ICAC (See Law, this volume). This may be worthwhile to consider for the future in the other cities. [Over the years, the ICAC has obtained high level of public support. For instance, in the ICAC Annual Survey 2006, nearly all respondents (98.9%) said that the ICAC deserved their support. Other than our successful track record and comprehensive checks and balances mechanism, the Community Relations Department (CRD) of the ICAC also put a lot of effort in enlisting public support to the fight against corruption. Through its seven regional offices and the mass media, CRD implemented a wide variety of educational programmes to make fighting corruption in the forefront of the public mind. CRD Officers also regularly attend the meetings of various local consultative bodies, meet with district leaders and residents to exchange views with them on ICAC's work. The ICAC has also set up the ICAC Club in 1997 to provide a channel for members of the public to translate the pledge of support to action by helping the ICAC to plan and implement district integrity projects.

9. Evaluate effectiveness and efficiency

Ultimately the litmus test for any policy system or institution is whether the formulated goals are reached and what the costs are to achieve those goals. What reports are available about assessments or evaluations of (parts of) the local integrity system?

The ultimate assessment questions are, to what degree is the system actually succeeding in enhancing integrity (enhancing ethical standards, corruption resistance, public trust in institutions and the quality of democratic life)? Is the system providing value for money? Are the unintended consequences acceptable? And if not, are they properly mitigated? (Uhr, 2005).

What was striking for all seven cities is the relative lack of data and systematic research addressing these questions. That is, attempts to measure effectiveness are merely restricted to data on outputs rather than outcomes in terms of the impact an integrity system has. The core integrity agencies generally were quite clear about their mission and their goals were explicit and sufficiently concrete. Most core agencies keep close track of the number of reports made to them, investigations and convictions, but how to interpret any changes over time? What does a falling rate of reports mean? More or less integrity? To get an understanding of the determined outputs, a broader scope is needed, taking into account what has been brought into action (input) as well as the contextual factors that affect the system in place.

Overall, additional data and critical analysis is required to establish what works and what does not. This weakness is not particular to the integrity systems of the seven cities studied in this book. It is a broader challenge for integrity systems at all levels of society (international, national, regional and local), as well as within organisations, corporate and non-profit.

[Here are some indicators for measuring the long-term effectiveness of the ICAC in combating corruption for reference:

(A) Corruption scene :

In the 1960s' and 70s', corruption in HK was rampant. Syndicated corruption was common. Starting from the 1980s', syndicated corruption in the government was cracked. The percentage of corruption reports concerning government departments has decreased from two-thirds in the early years of ICAC's establishment to one-third in recent years. Over the years, corruption is under control now. For example, there has been a gradual drop in the number of corruption complaints against Police officers, from 47% in 1975 to about 30% in 1984 and further down to about 10% in recent years. Nowadays, HK has a clean civil service and is regarded as one of the cleanest places in Asia and the world.

(B) ICAC Annual Surveys on local sentiments :

- Improving condition: the community perceived that corruption situation of Hong Kong was improving. Before 1997 around half of the survey respondents thought that corruption was common in Hong Kong. The figures dropped after the hand-over. In 2006, 65.4% considered corruption uncommon in Hong Kong.
- Corruption was not a problem as judged from personal experience : before 1997 around 8% of the respondents said they had come across corruption in the past one year. In 2006, only 2.8% said they, their relatives or friends had come across corruption in the past 12 months.
- Low toleration rate on corruption by the Hong Kong community : using a '0' to '10' rating scale where 0 represents totally intolerable and 10 represents totally tolerable, the mean score for attitude towards corruption in government departments was 1.1 in 2006. The mean score in respect of corruption in business sector was 1.8. Before ICAC's establishment, HK citizen accepted corruption as part of life.
- High level of support to ICAC's work : throughout the years, nearly all respondents said that the ICAC deserved their support. In addition, before 1997 around 60% of the respondents thought that the ICAC was impartial in conducting investigations. The figures were improving over the years: in 2006, 80.3%; 2005, 72.6%; in 2004, 70.9%.

(C) HK citizens actually put support into action, as indicated by:

- Public Confidence in corruption reporting :

Of the corruption reports received in 2006 and 2005, 73% were non-anonymous: the highest proportion since the ICAC's inception, reflecting the public's confidence in the Commission. Only one-third of our complainants were willing to disclose their identity in the first few years of ICAC's set up.

- Change of attitude of the business sector :

In dire contrast to the early days, business organisations now consider the ICAC as their partner in cost control and maintaining their reputation.. For instance, every year, around 400 business organisations have adopted ICAC's preventive education services, e.g. code formulation / review, training and advisory service. 70% of listed companies approached have adopted ICAC's suggestion to formulate / review their company's corporate code of conduct. Various professional associations and chambers of commerce also partnered with the ICAC to plan and implement various ethics programme programme. ICAC's training has been accredited by most professional associations in HK, In addition, the Hong Kong Ethics Development Centre of the ICAC also worked closely with the strong support and steer of six leading chambers of commerce in HK.

- Local community's support in planning and implementing district integrity projects :

Each year, around 400 local organisations joined hands with the ICAC to organise various integrity projects to disseminate probity messages to local residents. On average, half of the funds of these district projects is sponsored by the local organisations.

- Local residents' support and assistance in ICAC's projects :

In 1997, the ICAC set up the ICAC Club to provide a forum for supportive members of the public to help directly in planning and implementing ICAC's integrity projects. At present, we have around 1000 Club members.

(D)International Rankings :

After more than 30 years of dedicated efforts in fighting corruption, HK is regarded as one of the cleanest cities in the world, as indicated by some of the international surveys as follows:

- Transparency International's (TI) Corruption Perceptions Index 2007 ranked Hong Kong as the 2nd least corrupt place in Asia and the 14th amongst 180 places, one place better than last year and the highest position since the handover. (ranked 15th in 2006 when 163 places were polled).
- Political and Economic Risk Consultancy 2007 Report ranked Hong Kong as the 2nd least corrupt territory amongst 13 Asian places, outperforming Japan. Hong Kong's score is 1.87, the best in 10 years and a big improvement from last year's. The study also noted "The ICAC has done a good job of reducing corruption in the public sector and getting cooperation of the public to fight most types of petty graft".
- In 2007, Heritage Foundation has, for the 13th consecutive year, ranked Hong Kong the world's freest economy resting on various factors, including the rule of law, lack of trade barriers, low taxes, and low level of corruption in government, judiciary and customs service.

CONCLUSION

The framework presented in this chapter consists of nine steps that can be grouped into three clusters (Table 1). The first cluster with steps 1 to 4 is called Taking Stock and makes an *inventory* of the actors present and the regulatory context and determines the scope in terms of what is covered and who is targeted. Comparing the results from the seven cities the conclusion appears to be that they do not differ very much in terms of which actors are present. This appeared to be the case for the ‘usual’ actors as an executive, a local council, the police and prosecutors. But every city also had a local ombudsman (or equivalent) and a local auditor (or equivalent).

Other similarities are that all systems appear to comply with regulatory requirements – even though these requirements differ for each city –, that the populations covered were broadly similar and that the definition used was of broadly similar scope. One aspect should be added though: not all systems include politicians within their ‘jurisdiction’ and this may seriously harm the over-all credibility of the system.

The results from the three steps (5-7) in the second cluster How the System Works are very different though. Even though all cities have instituted a core local integrity agency, the role, position and size of that agency vary considerably across the cities. The nature of the central integrity agency is at the heart of the most important differences between the studied cities. The main issues have to do with the independence of the agency and the resources it possesses (budget, staff, powers, support).

The range of policies and the balancing of internal and external checks and balances also varied substantially across cities. This suggests support for the critique of Pope’s temple approach as focusing too much on the presence of different actors, rather than on their exact scope and role.

The cooperation and coordination between the institutions of a local integrity system seemed to create fewer problems than might be expected. The integrity agency, the ombudsman, the auditor and the accountant normally fulfil their own role within the system and do so in a coordinated fashion.

However, the big differences between the cities is the relative strength of integrity elements in the overall local system. Some of integrity elements of LIS systems are weak because policies and powers are lacking to investigate properly as well as invest in the prevention of corruption and other integrity violations. In most cases this is not a matter of intention or vision, but of a lack of resources, powers and authority. Ideas for policies from other cities might help to improve the system. Certainly, that is a key purpose of this volume.

At the level of integrity elements and agencies, there is a world to win. What system of reporting violations and protecting whistle blowers might be of use, what types of ethics codes for gifts etc. work, what types of training of leadership seems to work elsewhere? Further comparison and exchange between local integrity systems at the policy and instrument level might help.

There is currently not enough systematic research into the support for and effectiveness of the local integrity systems in the cities to draw final conclusions about the performance of each city’s LIS. Some of the cities with more established LIS, in particular more established core agencies, have done more research, but even that is relatively sporadic.

More in general, LIS actors show little dissatisfaction with their own performance. This is of course not that surprising. Institutional self-reflection and self-criticism is not an easy thing to accomplish. For observers however, this is worrying. Weak

systems do not seem to understand that they are tackling only a limited part of the integrity problem and do not seem very eager to improve and strengthen the system.. Perhaps placating the powers that be or just plain fear can be blamed for this. A bigger scandal might help, sceptics might conclude. However, strong systems do not show a lot of self-reflection. They are more than convinced that their mission is a crucial one and that every dollar spent is more than worthwhile. More money, more staff, more authority, because it is for the good. To be honest, we seriously doubt it.

The Local Integrity System's research agenda

The purpose of this book is to enhance and promote systematic analysis and assessment of local integrity systems in cities around the world so that these systems can become more effective in fighting corruption and safeguarding integrity. As a first step in this project, the City of Amsterdam and the Integrity of Governance Research Group at the VU University Amsterdam organized a conference on the topic in Amsterdam in February 2007 inviting representatives and scholars from six other world cities spanning four continents. The papers presented at the conference, after outside review and revision, form the basis for this book. Analysing and comparing the results produced the framework presented in this chapter. As we look forward into the future, the contours of a research agenda for local integrity systems take shape. First, the framework presented in this chapter should now be applied and tested for its value in other cities. These might be cities comparable in level of development and democracy, but also cities in less developed countries. What is appropriate for small cities? Does the framework still hold? What should be adapted?

Second, there is a dire need for systematic analysis and assessment of the performance of integrity systems, not only at the local level, but at all levels in society and other sectors, for example, police and corporations. Very large amounts of taxpayer money are spent in cities to fight corruption and safeguard integrity, yet we know very little about the actual performance of these integrity systems. What are effective methods for evaluating performance of integrity systems?

Next, these evaluation methods should be used to evaluate and compare different LIS approaches around the world. What can we learn about the effectiveness and efficiency of and support for different approaches? Analyses would probably include stakeholder opinion and support analysis, analysis of targeted populations' attitudes and behaviour, and network analysis of how the different actors cooperate and coordinate. In the end, the credibility and legitimacy of integrity systems will depend on showing that they work.

Fourth, in all the seven cities, integrity came onto the local government agenda after an integrity crisis. Only then were decisions made or legislation passed. What does this mean for public officials in other cities who want to get integrity onto their executives' agenda so that the fight against corruption and the safeguarding of integrity is taken seriously? Do they have to wait for a crisis, or can the challenge be addressed before a serious crisis erupts?

Fifth, in this book we have focused on the hitherto neglected level of local integrity systems. But as our analysis shows, the local integrity system does not operate in isolation. Further research that focuses in the interrelationships of integrity systems at the international (UN Convention, OECD), national and local levels is warranted and the use of multilevel research methods seems appropriate. This may also lead to answers to the important question about whether central policy initiatives and directives are able to create decentralized integrity systems.

Finally, one theme that emerged in most cities is the relationship between integrity and public trust. In many cities corruption scandals supposedly led to a decrease in

public trust and initiatives to build and improve the local integrity system were geared toward restoring that public trust. The implicit assumption is that the higher the integrity of local government and its officials, the higher the public's trust in that local government. No research has yet been able to "prove" that relationship. There is much research that shows that public trust in many places around the world has been declining (e.g. Nye et al, 1997, Van der Walle, 2004, based on surveys by e.g. US General Social Survey, World Values Survey or Eurobarometer), but no research exists to date to show how that relates to integrity. The cities reported in this book, have been investing in integrity and it would be interesting to find out whether they have been rewarded for those endeavours with public trust. Systematic research, both large-scale public surveys as well as in-depth interviews with citizens, is needed.

The exploration of the relationship between integrity and trust as well as the relationship between the integrity of a system and the support and legitimacy in the eyes of citizens and stake-holders, might also stimulate new types of integrity research in other sectors and domains. A corporation might benefit from a Corporate Integrity System which pays attention to moral and ethical quality of its organization, its employees and its activities. The same might be true for a Police Integrity System or a Non-Governmental Organizations Integrity System. These governance systems might learn from experiences in local and national integrity systems . However, they will benefit most from direct and concrete comparison with similar organizations and sectors.

Overall, the comparative study of the content, working and performance of local integrity systems seems to be a worthwhile perspective for the research as well as the policy development in the intriguing area of the ethics and integrity of governance.

Table 6: Policy instruments and responsible actors for civil servants' integrity

Policy approach		Responsible actor						
City		Amsterdam	Antwerp	Hamburg	HK	London	NY	Sydney
Values-based	HRM processes (selection, socialization, training, appraisal, code)	Line mgt with the help of Integrity Bureau	Line mgt with help of IB	Line mgt with help of DIE	Civil Service Bureau (CSB) and the CAB, ICAC, line management	Line mgt; Monitoring Officers	Line mgt	Line mgt, overseen by DLG
	Management practices (leadership commitment, culture)	Line mgt	Line mgt	Line mgt	ICAC, CSB, line management	Line mgt	Line mgt	Line mgt, assisted by ICAC, Ombudsman and DLG.
Compliance-based	Detection	Anyone to report to IB/ local auditor	Anyone to report to IB	Anyone to report to DIE or prosecutors office	Anyone to report to ICAC, CSB, Ombudsman	Anyone who reports to the Standards committee??	Anyone can report to DOI	Anyone can report to ICAC, Ombudsman and DLG.
	Investigation/internal	Line mgt with help of BI, Internal Audit, Finance Inspectorate	Line mgt with help of BI, Internal Audit, Finance Inspectorate	Line mgt, internal audit units and DIE	CSB, line management,			Line management, with help from ICAC and Ombudsman.

Investigation/external	Public prosecutor, Police, Local ombudsman, Media	Public prosecutor, Police, Local ombudsman, Media	Public prosecutor and police External accountant, local ombudsman and local auditor Media	ICAC, Police, Court, Ombudsman, Audit Commission, media	Investigating Officer?	DOI	Police, ICAC, Ombudsman, DLG, media.
Adjudication	Line mgt (with advice from BI), executive and judge	Line mgt (with advice from IB), executive and judge	Line mgt (with advice from DIE), prosecutors office, judge	Court, CSB, line management	Standards committee	DOI	Line mgt, executive (local council and/or state), state judiciary.
Sanctioning	Line mgt, executive and judge	Line mgt, executive and judge	Line mgt, executive, prosecutors office and judge	Independent Public Service Commission, CSB, court, line management	Standards committee	DOI	Line mgt, executive (local council and/or state), state judiciary.

Public involvement	Education	BI/ombudsman/local auditor: media appearance. BI: external trainings	BI has 2 members of private companies and 2 members from academic world.	No one	Education and Manpower Bureau (EMB), ICAC (at two levels: (i) the CRD of the ICAC deeply involved the business community, government departments, various local organisations and schools in jointly organising integrity projects or educational activities to disseminate anti-corruption messages to their members or join hands in organising activities; (ii) prominent citizens sit on four advisory committees of the ICAC and advise the ICAC on different aspects of its work). Committee on Promotion of Civic Education	? lobbyists are prohibited from giving gifts to any public servant	Very limited local councils, ICAC, Ombudsman, DLG.
	External communication Civic initiatives						

Table 7: Internal and external checks and balances in Amsterdam integrity system

Type of violation	Civil servants			Politicians		
	Primary responsibility	Internal check	External check	Primary responsibility	Internal check	External check
1 corruption: bribing	Line management	Bureau Integrity	Accountant, auditor and ombudsman Police and justice (Media)	Line management*	none	Police and justice (Media)
2 corruption: nepotism, cronyism, patronage	Line management	Bureau Integrity	(Media)	Line management	none	(Media)
3 fraud and theft	Line management	Bureau Integrity	Auditor and accountant Police and justice (Media)	Line management	none	Auditor and accountant Police and justice (Media)
4 conflict of (private and public) interest	Line management	Bureau Integrity	Auditor and accountant (Media)	Line management	none	Auditor and accountant (Media)
5 improper use of authority (for noble causes)	Line management	Bureau Integrity	Ombudsman (Media)	Line management	none	(Media)
6 misuse and manipulation of information	Line management	Bureau Integrity	Auditor and ombudsman (Media)	Line management	none	Auditor (Media)
7 discrimination and sexual harassment	Line management	Bureau Integrity	Police and justice (Media)	Line management	none	Police and justice (Media)
8 waste and abuse of resources	Line management	Bureau Integrity	Auditor and accountant (Media)	Line management	none	Auditor and accountant (Media)
9 private time misconduct	Line management	Bureau Integrity	(Media)	Line management	none	(Media)

* line management for politicians refers to the leadership of political parties.

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