



# Building a Pro-Integrity Culture in the Public Sector: A Review of Promising Practices

# BUILDING A PRO-INTEGRITY CULTURE IN THE PUBLIC SECTOR



## **A review of promising practices**

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## INTRODUCTION

A pro-integrity culture goes beyond policing corruption to build the capabilities and practices of public sector leaders and staff, integrating the protection and enhancement of the public interest into their everyday work. ANZSOG has partnered with the Victorian Public Sector Commission to sponsor research by experts at the University of Sydney into practical changes the public sector can make to foster a pro-integrity culture.

Deploying an innovative action research methodology, the research team is working with communities of practice in 4 Victorian government agencies to trial new practices and track their effects on staff behaviours. To help motivate the action research projects in each of the agencies, the researchers developed a database of promising practices that have been trialled and documented in other Australian and international public sector agencies. This database was shared with communities of practice to assist them in their identification of practices to trial.

This analysis is shared here for the benefit of practitioners across the sector, with the caveat that the selection of practices featured in this report aims at presenting communities of practice with options, rather than a comprehensive accounting of all pro-integrity measures being implemented across the public sectors of Australia and Aotearoa New Zealand. Indeed, the review process underlined the need for more systematic documentation of the practical actions that are being trialled and implemented for the purposes of fostering pro-integrity cultures, so that promising practices can be rendered more visible to practitioners.

The review provides a framework for categorising the variety of practical actions that are being taken to change public sector practices. This framework, as well as the concrete examples of each category of practice, can assist the sector to identify different approaches for the development of fit-for-purpose interventions.

## APPROACHES TO MANAGING INTEGRITY

*“It is often said that culture eats strategy for breakfast. I would add that culture eats personal ethical values for breakfast too. The informal and formal systems of a workplace can better explain misconduct than individual characteristics ...” (Tсахуриду, 2022)*

The academic literature on ethics and integrity in the public service distinguishes between two approaches – a compliance-based approach and a values-based approach.

- A **compliance-based approach** to integrity is grounded in contractual exchange theory (Homans, 1961). Expectations for behaviour are codified in ethical norms, compliance to which is enforced and deviations from which are sanctioned. The imposition of norms is top-down, making the essence of ethical conduct based on fear of sanctions rather than shared beliefs in the appropriateness of those norms. On the one hand, this might suggest inherent distrust of employees' character (Perlman, Reddick, & Demir, 2024), on the other hand this contributes to salience of ethical norms and expectations for behaviour (Weaver & Trevino, 1999) raising employee awareness of circumstances enabling ethical failures.
- **Values-based integrity approaches** rest on the ideas of social exchange theory (Blau, 1964). According to this theory employees respond to organisational efforts aimed at supporting them by supporting organisational goals. This reciprocity enables ethical behaviour without the need to resort to sanctions or imposing rigid rules. One of the key components of an effective values-based integrity strategy is aspiration towards a consensus on what values should underpin behaviour (Perlman et al., 2024).

A compliance-based approach alone adds layers to already complex organisational structures which may lead to additional transaction costs and loss of efficiency (Webb, 2012). On the other hand, reliance solely on a values-based strategy may result in a suboptimal formulation of integrity goals and vague operationalisation, especially if the values are not shared or understood widely by employees. Further, shared values and practices underpin culture change (Silverzweig & Allen, 1976) which is an important aspect of ensuring integrity of any organisation.

The individual integrity of employees can help exercise professional judgement, while a pro-integrity culture engenders a shared understanding of expectations, norms, values, and how to apply them effectively in practice (Lasthuizen, 2008). Organisational culture that is imbued with integrity stimulates systematic and consistent ethical behaviour (Kaptein, 2008; Trevino & Weaver, 2003). It can be defined as formal and informal aspects and practices in an organisation that work together to guide employees towards integrity in their behaviour (Trevino & Weaver, 2003).

Therefore, a **pro-integrity culture** should rely on both approaches to make sure that integrity risks are properly managed, and that opportunities for reflecting on, having conversations about, and practices of integrity are created, maintained, and embedded in the day-to-day operations of the organisation. The main challenge, however, is translating the philosophy behind pro-integrity approaches into the “nitty gritty” of everyday operations (Rasche & Esser, 2007).

## INTEGRITY IN THEORY AND PRACTICE

Academic debates about the components of pro-integrity cultures and frameworks are somewhat divorced from the practical applications of integrity. This theory-practice divide is important because it is reflected in the following:

Academic efforts rarely (if at all) provide detailed step-by-step, granular recommendations and actions for practitioners that can be easily integrated into everyday work.

Practical actions and recommendations that can be found in government-produced action plans, reports, and guidelines are not always rooted in theory and are often aligned with offerings and insights from the private sector. Leadership practices are one such example, where much of the research informing government reports is based on private sector tools and frameworks (e.g., Deloitte's "Leadership Shadow" referenced in the APS Integrity Action Plan (2023)).

The evidence base for the efficacy of practical interventions is rather thin, hence it is difficult to make a reliable prediction whether certain practices will, in fact, be effective. This is only logical, given that testing everyday practices would require a natural experiment or a quasi-experimental design that is able to isolate the effect size from other noise and intervening variables. Such experiments are costly and time-consuming.

To bridge the theory-practice divide there is a need for proactive and innovative evaluation of existing practices and their effectiveness in improving pro-integrity cultures. The first step towards such an evaluation in a systematic way is to make visible the existing practical actions that public sector agencies have implemented. The project researchers created a database of promising pro-integrity practices. This report is a compilation of the indicative practices in each of the identified categories.

## METHODS: FINDING PROMISING PRO-INTEGRITY PRACTICES

The review includes a range of practical actions that have been taken to improve pro-integrity cultures across the Victorian public sector.

The sources of these practices include:

- Recommendations from government reports on integrity in the Australian public sector across different jurisdictions (Federal level, Victoria, South Australia, Queensland, Western Australia) and internationally.
- Examples of integrity-enhancing practices already in place in the Australian public sector, and internationally, most prominently in the OECD countries.
- Insights from informal interviews with national and Victorian government integrity experts.

For ease of navigation, each practice that was identified through the review has been assigned a category based on the nature of the culture and practice change area in which it is used or can be applied. To categorize promising practices identified in the “Menu of promising integrity practices” database, we adapted the Hoekstra et al. (2023) framework, as shown in Table 1, below.

**FIGURE 1: Mapping of categories based on hoekstra et al. (2023) framework**

Hoekstra et al. (2023) framework	
<i>Attention</i>	
whether integrity issues receive sustained attention, are regularly discussed, and allocated sufficient resources.	<ul style="list-style-type: none"> <li>• “Safe to speak”</li> <li>• Training</li> <li>• Relational practices</li> <li>• Rewards</li> <li>• Formal rules and procedures</li> </ul>
<i>Clarity</i>	
whether integrity is clearly defined, formulated, and operationalised.	
<i>Leadership</i>	
whether managers lead by example by showing exemplary behaviour, support for employees, and adherence to integrity policies and practices.	
<i>Balance</i>	<ul style="list-style-type: none"> <li>• Formal rules and procedures</li> <li>• Training</li> <li>• Relational practices</li> </ul>
attention is paid to both values (training, internalisation) and rules (policies, codes) resulting in a coherent integrity strategy.	
<i>Policies</i>	<ul style="list-style-type: none"> <li>• Formal rules and procedures</li> <li>• Recruitment</li> <li>• Data</li> </ul>
specific integrity policies and measures are in place.	
<i>Organisation</i>	
integrity is institutionalised through ethics or integrity offices, commissions, appointees.	
<i>Reflection</i>	
monitoring and evaluation of integrity efforts is regular and critical and leads to improvement.	



## CATEGORIES OF PRACTICE

The Hoekstra et al. (2023) components have been converted into **9 categories of practices**. These are described below.

1. **Formal rules and procedures** – specific policies, rules, guidelines regarding integrity. Rules are important to have in place and reflect a compliance-based approach to integrity that helps hold employees accountable for their behaviour and signal concrete expectations of their conduct.
2. **Training** – initiatives that aim to develop knowledge, skills, awareness, and capacity to apply integrity principles, and make decisions that are in line with integrity rules and values. Training plays a crucial role because it helps ensure consistency between established rules and professed values and their understanding, interpretation, and application.
3. **Recruitment** – specific rules applied during recruitment processes that help ensure that staff are recruited with ethical principles in mind, and that their previous experience of integrity is consistent with expectations in the public sector.
4. **Rewards** – specific measures that signal recognition of integrity efforts and ethical behaviour of employees in tangible or non-tangible ways (for example, monetary and non-monetary rewards).
5. **“Safe to speak”** – measures that aim to create a safe environment for employees to encourage proactive reporting of wrongdoing, as well as open and candid discussions of integrity issues that take place without fear of retribution or adverse career consequences.
6. **Leadership** – efforts of leadership, from mid-level management to senior executive service and politicians to demonstrate exemplary behaviour, support for employees, and adherence to integrity policies and practices. This is an important area as individual leader integrity send strong signals to followers and can affect outcomes such as trust, satisfaction, performance, and follower integrity.
7. **Relational practices** – informal practices that rely on building and leveraging relationships to create a shared understanding of integrity rules and values. Such practices may also help create psychological safety and build up employees’ courage to discuss difficult and uncomfortable topics.
8. **Communication with public** – these practices involve communicating expectations of conduct by public servants to the citizens to ensure that integrity risks are reduced. These can take form of educating the public or creating specific rules and procedures. This category of practice is not reflected in the framework by Hoekstra et al. (2023) and reflects innovative thinking by public servants practicing integrity.
9. **Data** – the use of data to improve pro-integrity cultures by identifying ways to measure integrity, collecting enforcement data, developing guidance on how to interpret data and recognise integrity risks, using data to evaluate the effectiveness of other integrity measures.

The following sections provides examples from these different categories of practices captured in the review process. Importantly, each identified practice was coded for up to 3 categories – the tables below place each example into only one category but some fit into more than one.

## 1. Formal rules and procedures

Rules and procedures are central to a compliance-based approach to integrity management. Rules provide a framework to expectations of conduct and help hold employees accountable for their behaviour. Examples of formal rules, policies and procedures include codes of conduct, integrity rules and regulations (for instance on conflict of interest, reporting gifts, hiring, procurement, etc.), training programs, procedures for reporting integrity violations, investigation procedures, integrity risk analysis frameworks, among others (Hoekstra et al., 2023).

Rules-based approaches rely on extrinsic motivation of individuals to act, meaning that public servants are assumed to abide by integrity rules in order to be recognized and rewarded for it or to avoid punishment rather than because they believe in ethical behaviour intrinsically. It is also a top-down strategy of integrity management whereby rules are usually designed by decision-makers based on their understanding of the situation on the ground, which makes rules a relatively easy strategy to implement and monitor (Andersson & Ekelund, 2022).

The importance of clear rules and policies around integrity is acknowledged by national and international bodies working to promote best practices of integrity management. For example, the OECD mentions codes of conduct and formal integrity rules, an adequate legal framework as key elements of the ethics infrastructure and integrity systems in several documents, for example, a framework for assessment of public integrity (OECD, 2005), Public Integrity indicators (OECD, 2021), among others. The World Bank (2020) in its work on anti-corruption efforts underscores the importance of legal frameworks and regulations concerning procurement, conflict of interest declarations, and so forth.

While not sufficient to address integrity issues and too narrow and top-down to facilitate a pro-integrity culture change on their own, especially since stricter rules and policies tend to be the first reaction to prominent integrity violations (Anechiarico & Jacobs, 1996), rules and policies are important to ensure that public servants have clear understanding of what is expected of them and what to do in specific situations for effective management of integrity risks and violations.

### 1.1. Strong Procurement Policies, Systems, Practices – Independent Broad-based Anti-corruption Commission (IBAC)

Operation Daintree was an investigation by the Independent Broad-based Anti-corruption Commission (IBAC) in Victoria, highlighting how improper influence compromised the procurement process for a \$1.2m contract awarded to the Health Education Federation (HEF), and constituting serious corrupt conduct. As a result of Operation Daintree, IBAC has made 17 recommendations, including recommendations to ensure ministerial advisors do not act inappropriately in their dealings with unsolicited proposals and the public service.

The IBAC's special report recommended that the Department of Health reviews, and where necessary, strengthens its procurement policies, systems, and practices to address the corruption vulnerabilities identified by IBAC in the report, including:

- the assessment and management of unsolicited proposals to supply goods or services, regardless of how a proposal is conveyed to it
- its conflicts of interest framework so employees and contractors understand their obligations to identify, declare and manage such conflicts and avoid them where possible
- that suppliers are sourced in a way that complies with competition requirements in legislation and/or procurement policy and procedures

Source: [\*Operation Daintree: Special Report \(2023\)\*](#)

## 1.2. Integrity Advisors – Australian National Audit Office (ANAO)

The ANAO appointed an Integrity Advisor to support its Integrity Framework. The role of the Integrity Advisor includes responsibilities to:

- increase integrity awareness across the organisation
- support the effective, ongoing application of the Integrity Framework, and
- report annually to the ANAO Executive Board of Management (EBOM) on actions taken under the framework

The Integrity Advisor acts as a point of contact for staff who are seeking advice and support on the application of the Integrity Framework. However, they are not responsible for determining if the matter is an integrity breach, or decision-making regarding the matter raised. Staff who has sought any advice from the Advisor are responsible for the application of policies in the framework and subsequent action based on the advice provided.

According to ANAO's report, the ANAO Integrity Advisor has been actively answering queries by staff who approached the Advisor and delivering integrity training sessions during the Integrity Awareness week and to graduates and new starters as part of staff induction processes. The Integrity Advisor also attends multiple forums, group, and branch meetings to raise awareness of the Integrity Framework and role of the Integrity Advisor, and what responsibilities all staff members have in relation to integrity. Joining such meetings also provide individuals with the opportunity to raise questions.

*Source: [ANAO Integrity Framework and Report 2022–23 \(2023\)](#)*

## 1.3. Culture and Accountability in the Queensland Public Sector

Professor Peter Coaldrake was appointed by the Premier of Queensland to review the accountability of the Queensland Government. The final report titled "Let the Sunshine In," made 14 recommendations to strengthen accountability and integrity mechanisms in the Queensland government. Two of its recommendations relating to formal rules and procedures and how they build a pro-integrity culture are briefly described below.

### **Recommendation 1: Framework for appropriate ministerial and public servant relationships**

The report recommends that training happens face to face, and to involve public service and ministerial staff (and former ministers and senior officials) in workshop sessions to expose the different pressures and power imperatives of ministerial and public service functions.

It also recommends that for the culture of fear-based responses to change, the culture of integrity and mutual respect needs to be demonstrated by both political and professional leaders. Reinforcing the framework for appropriate political-administrative relationships must be explicitly codified in Codes of Conduct for Ministers, their staff, and for public servants and be part of inductions and trainings for all parties. Regular feedback on how interactions are perceived and received are required.

### **Recommendation 2: Robust justification for engaging external consultants and contractors**

The report recommends that there is a need for agencies to examine in more detail the purpose for which external consultants or contractors are being engaged, what it reveals about internal capacity, how to build capacity and finally consider if the benefits of doing so are truly for the best interests of the taxpaying public.

*Source: [Let The Sunshine In: Review of Culture and Accountability in the Queensland Public Sector \(2023\)](#)*

## 1.4. Further examples

Other Formal Rules & Procedures Interventions	Source	Jurisdiction
Enhanced Personnel Security Capability working group	<a href="#">APS Good Practice Guide</a>	Department of Foreign Affairs and Trade, Australian Government
Strong ministerial staff code	<a href="#">Victoria IBAC Operation Daintree special report</a>	Victoria Public Sector Commission
Interagency Conflict of Interest Network	<a href="#">OECD Public Integrity Handbook</a>	The Office of the Conflict of Interest and Ethics Commissioner, Parliament of Canada
Reporting Gifts Messaging experiment	<a href="#">OECD Observatory for Public Sector Innovation</a>	Mexico
Public Procurement Governance system change	<a href="#">OECD Observatory for Public Sector Innovation</a>	Slovenia
Dedicated integrity advisors	<a href="#">OECD Public Integrity Handbook</a>	France
Punitive measures commensurate with the offence and consistently applied	<a href="#">OECD Public Integrity Handbook</a>	N.A.
Examples from Experts		
Having effective conflict of interest management mechanisms in place	Public Service Regulator	

## 2. Training

The word “integrity” implies “wholeness,” that precludes weaknesses or inconsistencies. It is about consistent application of principles and values. This is an interesting detail because very often integrity is compromised not (entirely) because an opportunity exists but because there is a lack of consistency between established rules and professed values and their understanding, interpretation, and application (Perlman, Reddick, & Demir, 2023).

Training is an important component of integrity management because abiding by rules requires knowledge of those rules, and cultivating values needs exposure to situations and scenarios that promote those values (Cochrane, 2019). Integrity training can fulfil both of these needs – by clarifying and explaining the rules and procedures and demonstrating what they mean and how they apply in practice, and by helping public servants to realise the value of integrity and develop intrinsic appreciation of ethical behaviour and pride in working in the public service which can contribute to positive work attitudes.

There are challenges for developing effective training programs. While a compliance-based approach lends itself more easily to training courses, for example, on how to manage conflict of interest, short exposures to integrity education may create superficial awareness or lead to lack of enthusiasm and may be unlikely to produce long-term change required for a culture shift (Callerstig, 2016). Internalization of integrity attitudes take time and needs a systematic approach and repetition to form consistent behaviour and a mature integrity value system (Cochrane, 2019).

Another aspect of training that needs attention from integrity managers in the public service is a way to evaluate the effectiveness of such programs. While public servants’ behaviour and incidence of integrity violations could be a reliable indicator, there are ways to assess the effectiveness of training by focusing on application of learning, organizational impact, and return on investment (Cochrane, 2019).

### 2.1. Integrity Courses by the Australian Public Service (APS) Academy

The APS Academy was established in July 2021 as a division of the Australian Public Service Commission to support the APS workforce in building the skills and knowledge which are unique and critical to working in the Australian public service. It offers a myriad of courses to train APS employees in their understanding and application of integrity. Two examples are mentioned below.

#### **Example 1: Senior Executive Service (SES) Integrity Masterclass**

The SES Integrity Masterclass is aimed at providing SES leaders with current and practical applications towards embedding pro-integrity culture across the APS. The course content highlights the importance of integrity in the workplace by utilising current, real-world issues as examples and through a practitioner-led approach.

The following outlines key concepts and pointers extracted from the APS’s Integrity Good Practice Guide on how the SES Integrity Masterclass Series promotes and strengthens a workplace culture of integrity and integrity capability.

Championing an Integrity Culture:

- A pro-integrity culture in the APS is essential to enhancing trust, producing better decision making and exemplifying high professional standards.
- Senior leaders are stewards of culture and must foster an environment where integrity conversations are mainstream.
- The building blocks of a strong integrity culture are awareness, capability and accountability.

Strengthening workplace integrity culture:

- Integrity is developed through critical reflection – individually and at the organisational level.
- Leading integrity entails developing trustworthiness and authenticity.
- Regular integrity conversations foster a reflective space and build psychological safety.
- Effective integrity management ensures proper leadership succession planning and builds the bedrock for future organisational reflection.

Enhancing integrity capability:

- Mutual awareness and recognition for the importance of integrity is vital to fostering environments where integrity conversations are mainstream.
- The difference between ‘pro-integrity culture’ and simply ‘anti-corruption’ is the maturity of agency culture and capability to have integrity conversations.
- Bring your own experiences and reflections to the table when engaging in integrity conversations.

### **Example 2: APS Foundations: Integrity in the APS**

According to the APS Academy (2021), this course is “designed to strengthen APS employees’ understanding of the importance of acting with integrity as they undertake their duties”. It contains “information and activities that provide a foundation for navigating integrity issues for new APS employees as they commence their public service career”. The content was provided by the Australian Public Service Commission. In addition, some agencies have made this module in their internal eLearning platforms mandatory in their induction and ongoing training programs.

*Source: [Integrity Good Practice Guide: APS Integrity Taskforce \(2023\)](#), [SES Integrity Masterclass \(2021\)](#), [APS Foundations: Integrity in the APS \(2021\)](#)*

## **2.2. Uplift procurement, contract management, and records management skills of employees**

The APS Academy offers a series of courses on procurement provided by the Department of Finance: Procurement Basics eLearning, Procurement and Contract Management Basics, and Procurement in Practice course. These courses are part of the Commonwealth Procurement and Contract Management Training program.

The APS Academy also offers a Records Management course provided by the National Archives of Australia. It introduces APS staff to the key principles, obligations and expected behaviours regarding how records are managed in the Australian Public Service.

*Source: [Louder Than Words: An APS Integrity Action Plan \(2023\)](#), [Procurement in Practice \(2021\)](#), [APS Australian Government Contract Management Guide \(2021\)](#)*

## **2.3. One Habit at a Time - Australian Taxation Office (ATO)**

The “One Habit at a Time” Program is designed by the ATO to help staff weave habits that align to the ATO’s cultural traits into their everyday work. According to the ATO, changing everyday habits are key to making positive changes to the way staff work together at the APS workplace and the integration of new ways of thinking into an individual’s routine and culture. It runs over six weeks where an agency’s learning, development and communication activities focus on one habit for all staff to apply. The APS Academy gives access to the ATO’s resources on the “Own It” habit. The “Own It” habit sheds light on the important role leaders play in “creating an environment where people feel empowered and trusted to own their actions, outcomes, mistakes, and behaviours”. The course consists of steps on how leaders can lead conversations, comprehensive resources to build integrity, and practical peer activities to encourage integrity conversations.

Source: *Integrity Good Practice Guide: APS Integrity Taskforce (2023)*, *ATO One Habit at a Time - Own it: Pro-integrity culture building activities (2021)*

## 2.4. Further examples

Other Training Interventions	Source	Jurisdiction
Every day by Everyone	<a href="#">Western Australia Government</a>	West Australia
Integrity Matters Newsletter	<a href="#">APS Good Practice Guide</a>	Australian Federal Police (AFP), Australian Government
Integrity Week	<a href="#">APS Good Practice Guide</a>	Department of Infrastructure, Transport, Regional Development, Communications and the Arts, Australian Government
Training on building psychological safety	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Public Service Academy, Australian Government
Innovative approaches to training	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Public Service Academy, Australian Government
A continuing professional development model that emphasises integrity	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Public Service Commission
'ReFLECT' model and 'Reflective practice' model for thinking through integrity application at work	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Public Service Commission
Regular, scenario-based integrity training	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Public Service Commission
Targeted training on managing improper political interference	<a href="#">Victoria IBAC Operation Daintree special report</a>	Victoria Public Sector Commission
Judgement calls training	<a href="#">APS Craft</a>	Australian Public Service Academy, Australian Government
<b>Examples from Experts</b>		
Very detailed training with case studies of integrity violations, especially procurement	Anti-corruption expert	National government
Training on managing conflict of interest	Anti-corruption experts	Victorian Public Sector
Integrity as an integral component of inductions	Anti-Corruption expert	National government
Bank of integrity moments	Anti-corruption experts	Victoria Public Sector

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Integrity Scenarios on cards	Anti-corruption experts	Victoria Public Sector
Normalising conflict of interest through regular conversations, training	Service Regulator	Victoria Public Sector



### 3. Recruitment

Public sector employers are concerned with how to attract highly qualified jobseekers. Training employees for value alignment and with an aim to develop an intrinsic approach to the practice of integrity is common, however, it is imperative to ensure that future employees will make an effort to uphold established standards of integrity. Social identity theory suggests that one of the key attractions of joining an organization is the opportunity to satisfy shared motives and personal traits in common with other members (Ashforth & Mael, 1989; Tajfel & Turner, 1985). This implies that individuals are likely to assess how well their own characteristics align with those of the organization and its members when deciding whether to pursue membership. This means both that job candidates with a higher level of integrity will be attracted to organisations that maintain a pro-integrity image and that public sector organisations should invest resources in recruiting not just based on skills and qualifications alone but based on shared values, including integrity.

This approach to recruitment ensures value congruence between the employee and the organisation. Value congruence is a central component of person-organization fit theory, which posits that when individuals perceive their values to align with those of their organization, they are more likely to experience job satisfaction, organizational commitment, and lower turnover intentions (Kristof, 1996). Further, moral identity theory (Aquino & Reed, 2002) posits that Individuals with strong moral identities are more likely to act ethically. When value congruence exists, especially in terms of integrity and fairness, these individuals feel supported and empowered to maintain ethical standards. These theoretical insights highlight the importance of recruiting for integrity.

#### 3.1. Assessing of and including candidates' commitment to integrity during recruitment process – South Australian public sector

Under its recruitment guidelines, Chief Executives/agency heads or delegates must ensure that they undertake pre-employment screening to check on the identity, quality and integrity of prospective employees and diligently perform reference and background checks, such as whether they have been subject to an investigation or allegations of misconduct, before offering employment. This information must be obtained from candidates during a selection process and carefully considered prior to applicant recommendations or offers of employment. In addition to recruitment processes that ensure integrity, it is also important that decision makers for recruitment consider the possible perception of their conduct to embed integrity in decision making. This can be done by practicing the following approaches when recruiting public servants:

- **Open-mindedness:** An additional consideration for recruitment decisions is for selection panel members to consciously suspend their judgement on candidates until all information is gathered and to be as open minded as possible about candidates responses during the selection process to avoid giving the appearance of having a pre-conceived outcome and that others were not appropriately considered.
- **Clear and reasonable justification:** All public sector agencies should base selection decisions on a proper assessment of merit, mobility, ethics, diversity, fairness, flexibility and freedom from unlawful discrimination, patronage, or nepotism.
- **Conflict of interest declaration:** The Pre-Employment Declaration for employees requires them to declare if they have any conflict of interest. This is required of all candidates who have progressed to the final round of selection and the Chief Executive/agency head or delegate must ensure that any relevant disclosures in a Pre-Employment Declaration are adequately identified and considered.

Source: *Building Integrity: Embedding good practice in the South Australian public sector (n.d.), Guideline of the Commissioner for Public Sector Employment (2021), Pre-Employment Declaration (2021)*

### 3.2 Senior Executive Service Recruitment – Australian Public Service Commission (APSC)

The first recommendation of the APS Integrity Action Plan was to “Appoint the right leaders. Recruit people whose behaviour is consistent with the APS Values”. The APS recommends the selection of leaders who exemplify the ethical values, maintain respectful relationships. It also reports that leaders who achieve results through enabling others is crucial to building a high-performing service. The APS report notes that increasing visibility of upwards feedback expose people who lead with integrity and is helpful in indicating where behavioural ‘red flags’ may exist.

This entails rigorous recruitment checks for SES candidates, allowing more information about SES candidates to be provided by past performance appraisals and ‘360 degree’ reports. Agencies have flexibility in determining the assessment methods used in the recruitment process. However, for SES recruitment, the use of both interviews and referee reports is important to enable the canvassing of leadership and ethical behaviour. Referee reports are used by the selection committee to gather information and assess the suitability of candidates. Importantly, behaviours are as important as outcomes and therefore both must be considered as a part of referee reports. Excellence in delivering outcomes cannot be used to offset or minimise behavioural concerns that do not align with behaviours set out by the APS Values and Code of Conduct.

Source: *Louder than Words: An APS Integrity Action Plan (2023)*, *Senior Executive Service Recruitment (2021)*

### 3.3 Further examples

Other Recruitment Interventions	Source	Jurisdiction
<b>Clarity and communication about direct appointments</b>	<a href="#">Building Integrity: Embedding good practice in the South Australian public sector</a>	Government of South Australia
<b>Clear conflict of interest declaration expectations during recruitment</b>	<a href="#">Building Integrity: Embedding good practice in the South Australian public sector</a>	Government of South Australia

## 4 Rewards

Rewards are used to enhance employee motivation for desirable behaviour, including ethical behaviour and integrity at work. At the core of using rewards lies understanding of motivation as extrinsic or arising to secure external rewards or avoiding external punishment. Extrinsic motivation has a negative reputation in organisational behaviour theory and human resource management as it does not lead to autonomous, self-determined behaviours as is said to depend on external stimuli. Self-determination theory (Ryan & Deci, 2000) posits that extrinsic motivation is a continuum and that not all types of extrinsic motivation are non-autonomous. For example, identified and integrated types of extrinsic motivation involve internalisation of values of behaviour, for example ethical behaviour, and thus lead to genuine displays of such behaviour that are not contingent on external rewards (Ryan & Deci, 2000). Further, in cases where rewards signal appreciation of the employee's efforts and contributions they can lead to identified and integrated types of motivation where the reward is valued for what it represents rather than what it actually is (Ryan et al., 1983; Scott Rigby et al., 1992).

Scholarship on extrinsic motivation and rewards demonstrates that external rewards can be effective in eliciting desired behaviour if they are designed in a way that rewards employee autonomy and competence rather than acts as a more conventional carrot. This applies to efforts to motivate integrity and allows for creativity in designing reward mechanisms.

### 4.1 Commonwealth Awards for Excellence in Risk Management (Integrity) – Department of Finance

The Commonwealth Awards for Excellence in Risk Management (the risk awards) are implemented to promote the “importance of risk management in the design and delivery of all government activities. The risk awards showcase leading and proven risk management practices by Commonwealth entities, with the aim of these being adopted by other entities, to enhance risk maturity across the Australian Government”.

Award recipients and their entities are recognised at an Awards event at the end of each year. The benefits of participating in the Awards are as listed on its website:

- the opportunity to showcase the demonstrated approach to managing risk in your entity
- lifting the capability of the risk management professionals
- peer recognition of your commitment to managing risk
- elevating the importance of risk management across government
- the opportunity to receive valuable feedback from our panel of judges.

According to its website, the “nominations inform the Finance risk education program and continuous improvement in Commonwealth risk management practice”.

Each year the Risk in Focus category for the Commonwealth Awards focuses on a different area of risk management. The focus for 2024 was ‘Integrity Risks’. Through this awards category, the Department of Finance sought to showcase excellence in an agency's approach to the management of integrity risks.

*Source: [Commonwealth Awards for Excellence in Risk Management 2024 \(2025\)](#)*

## 4.2 Building Integrity in the South Australian Public Sector through remuneration and rewards

### Example 1: Thoughtful decision making of allowance and classification

The South Australian Public Sector's Integrity Framework report, introduced in June 2023, aims to embed a culture of integrity across all government sectors, in the day-to-day work of public sector employees, regardless of the nature of their role.

The report encourages decision makers to ensure that allowances match the duties carried out by the public servant, to avoid using reclassification/remuneration as a reward as it should reflect the value of the duties of the role, and to review increment progression upon proper assessment of the employee. These decisions are guided by concrete determinations of the Commissioner for Public Sector Employment, which are binding and cover a range of public sector employment matters, including remuneration – allowances and reimbursements, and classification.

*Source: [Building Integrity: Embedding good practice in the South Australian public sector \(n.d.\)](#), [Determinations \(2022\)](#)*

### Example 2: eThanks

The Reward and Recognition Good Practice Guide for South Australian Public Sector managers sets out the rationales for rewarding employees and the following principles to approach formal and informal recognition in a thoughtful, fair and ethical manner. The following principles are extracted from the Guide:

- **Aligned:** Best practice links reward and recognition programs to organisational culture and strategies, thereby encouraging employees to behave in a manner that aligns with and contributes to achieving strategic goals, which refers to the Public Sector Values, including values like honesty and integrity.
- **Immediate:** Managers should focus less on annual award ceremonies and place more emphasis on giving reward and recognition, such as regular praise and consistent feedback, soon after the accomplishment.
- **Fair:** Managers should base reward and recognition on clear expectations of performance to enhance p
- **Dynamic:** Reward and recognition strategies should be revised annually to ensure that they can be flexible enough to adapt to changing circumstances.
- **Tailored:** Reward and recognition should reflect employee needs and desires and approaches aimed at the individual or team level.

The eThanks initiative is an example given by the Guide that the value of reward and recognition can foster a pro-integrity culture where public sector employees can thank their colleagues for putting the Public Sector Values into action. The Guide also mentions that such initiatives are an innovative and alternative method of reward beyond cash remuneration and that embedding a culture of reward and recognition to provide incentive to employees need not be costly.

*Source: [Reward and Recognition Good practice guide for South Australian Public Sector managers \(n.d.\)](#), [eThanks \(2022\)](#), [Send an eThanks \(2022\)](#)*

### 4.3 Further examples

Other Reward Interventions	Source	Jurisdiction
<b>Above and Beyond Awards</b>	<a href="#">APS Good Practice Guide</a>	Australian Taxation Office (ATO), Australian Government
<b>Acting With Integrity Award</b>	<a href="#">APS Good Practice Guide</a>	Department of Finance, Australian Government
<b>Integrity Awards</b>	<a href="#">APS Good Practice Guide</a>	Treasury, Australian Government
<b>Public service medal for values-based leadership</b>	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Government
<b>Dedicated rewards for upholding integrity</b>	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Public Service Commission

## 5 “Safe to speak”

Integrity violations is a sensitive issue. Open and candid discussions of integrity issues that take place without fear of retribution or adverse career consequences can be difficult to enable. Hirschman’s (1970) exit-voice-loyalty model explains how individuals respond to dissatisfaction within organisations or institutions. “Exit” refers to the decision to withdraw or leave when problems arise, such as leaving an organisation. “Voice” involves attempting to improve or reform the situation by speaking up or expressing concerns. “Loyalty” acts as a moderating force that influences whether someone is more likely to exit or use voice. When loyalty is strong, individuals are more inclined to try to fix problems from within rather than leave immediately.

Applied to integrity violations and whistleblowing, this framework offers a useful lens for understanding how employees respond to unethical conduct. In Hirschman’s (1970) terms “safe to speak” culture is an environment where employees feel they can “voice” concerns if they perceive organisational actions as wrong (Beasley & Gentile, 2024). The “voice behaviour” is influenced by perceived integrity of the leader thus linking this element closely to “Leadership” (Peng & Wei, 2020).

Research on determinants of whistleblowing and reporting of ethical misconduct consistently demonstrates that people are more likely to report wrongdoing when they feel psychologically safe, perceive strong organisational support for integrity, and have confidence in the effectiveness and fairness of reporting mechanisms (see Kaptein, 2011). Psychological safety (Kahn, 1990) refers to a shared belief that the workplace is safe for interpersonal risk-taking. In psychologically safe environments, employees believe they can speak up with questions, concerns, mistakes, or ideas, without fear of humiliation, rejection, or punishment. While this concept originally emerged in the context of creativity and the need for security in individuals, it is gaining traction in research on ethics and voice behaviour such as whistleblowing (Liu, Liao, & Wei, 2015).

### 5.1 AFP Confidant Network – Australian Federal Police (AFP)

Under the Public Interest Disclosure Act (PID Act) (2013), which aims to promote the integrity and accountability of the Commonwealth public sector, AFP personnel seeking support can contact the authorized officers (AO) from the AFP Confidant Network. AOs – or confidants, are trained to maintain confidentiality of the discloser’s details, seek the discloser’s consent to detail information for the purposes of investigation and assess the risks of other persons taking a reprisal against the discloser.

The main role of the confidant is to provide support and options to employees who come forward to speak about unethical behaviour. AFP confidants are also trained in a two-day intensive training workshop that looks at the integrity framework and procedures for confidants and reporting obligations. Mandatory refresher training and integrity checks maintain the skills and knowledge needed in the role, ensuring that the Network’s integrity is maintained at a high level, instilling trust in the reporting process and ensuring a safe space to speak up.

*Source: Integrity Good Practice Guide: APS Integrity Taskforce (2023), AFP National Guideline on public interest disclosure (n.d.), Maintaining our Integrity (2005)*

### 5.2 ABF Speak Safe – Australian Border Force (ABF)

A key component of the Australian Government’s Department of Home Affairs’ Integrity Framework is mandatory reporting. Immigration and Border Protection workers, including ABF workers, must report instances of serious misconduct, corrupt conduct or criminal activity.

“Speak Safe” is a confidential support and advice service by the ABF, providing confidential support for ABF employees to report behaviour within, or connected to, the workplace, that conflicts with the Home Affairs’ Integrity Principles. Speak Safe officers also offer information to staff on how to respond to misconduct and assist them with submitting their reports to the Home Affairs’ anonymous reporting system, which can be made anonymously to any

officer within the Integrity and Professional Standards (I&PS) Branch under the Department. The I&PS Branch then ensures that the issue will be appropriately managed, monitored and resolved by officers.

Like the AFP Confidant Network, under the PID Act, ABF employees are protected by the PID Act 2013 legal framework, ensuring that they can speak up about unethical behaviour without fear of retaliation or threats.

*Source: [Integrity Good Practice Guide: APS Integrity Taskforce \(2023\)](#), [Mandatory Reporting: Procedural Instruction \(2024\)](#)*

5.3 Fostering a Speak Up Culture – Lessons from the Slovak Republic’s Corruption Prevention Department

Under its Anti-Corruption Policy for 2019-2023, the Slovak Republic made corruption risk management a core strategy to fight corruption and promote public integrity. To increase communication about risks, the OECD partnered with the Slovak Republic, to design two behaviourally informed interventions based on the OECD BASIC toolkit (BASIC stands for Behaviour, Analysis, Strategy, Intervention, Change), which is a framework to apply behavioural insights in public policymaking. The goal was to improve the understanding of a risk and appeal to exemplary leadership to increase risk communication. The effects of the two interventions were tested in an anonymous online vignette randomised experiment with over 2500 participants from the Slovak public administration.

Based on the findings from a survey experiment, there are several key takeaways on how to foster a safe environment for communicating corruption risks from the report.

- **Make risk communication feel safe and encouraged:** Experimental results find that a crucial factor for enabling risk communication is enabling public servants to feel safe when communicating about risk.
- **Empower leaders to set the standard through their actions:** Results showed that exposure to examples of good ethical behaviours from leaders tend to increase the likelihood of communication of corruption risks. Anti-corruption coordinators and cross-agency working groups act as important institutional leaders for effective risk management.
- **Ensure the risk communication process is easy and well-understood:** Greater knowledge and awareness of risk communication channels and trust in the system contribute to the likelihood of communicating about corruption risks.

*Source: [Improving Corruption Risk Management in the Slovak Republic: Results from a 2023 Experiment in Applying Behavioural Insights to Public Integrity \(2024\)](#)*

5.4 Further examples

Other “Safe to Speak” Interventions	Source	Jurisdiction
Difficult conversations	<a href="#">Building Integrity: Embedding good practice in the South Australian public sector</a>	Government of South Australia
Confidential ethics and integrity advice to all staff	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Government
Clarity of advice about working with ministerial offices	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Public Service Commission

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Foster psychological safety	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Public Service Commission
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## 6 Leadership

Research on the importance of leadership and leading by example for integrity in organisations is one of the most prolific areas in academic work on ethical behaviour and its determinants. Ethical leaders demonstrate integrity, fairness, and concern for others, setting a standard for employees to emulate. This modelling effect is supported by social learning theory (Bandura, 1977) which posits that individuals learn appropriate behaviours by observing and imitating role models. When leaders consistently exhibit ethical conduct, employees are more likely to internalise these values and reflect them in their own behaviour. For instance, Weaver, Treviño, and Agle (2005) discuss the idea of an “ethical role model” in their research and explore how ethical role models influence organisational members. They emphasize that ethical conversations, when modelled by leaders, can become a normative part of organisational culture, thereby promoting integrity.

Beyond modelling, ethical leaders actively communicate ethical standards and expectations, creating an environment where ethical discussions are encouraged and valued. This open communication fosters psychological safety, allowing employees to voice concerns and report unethical behaviour without fear of retaliation (see Xu, Loi, & Ngo, 2016). Furthermore, ethical leadership contributes to the development of an ethical organisational climate, which serves as a collective understanding of what constitutes appropriate behaviour within the organisation. A strong ethical climate, nurtured by ethical leadership, has been linked to reduced instances of unethical behaviour and increased employee engagement (Mayer, Kuenzi, & Greenbaum, 2010).

### 6.1 Senior Executive Service (SES) Performance Leadership Framework – APSC

The APS Integrity Action Plan formulated by the APSC places a particular emphasis on the APS leadership as cultural architects for integrity. While it acknowledges that integrity should occur at all levels, it highlights that without the right tone and action modelled from the top, there will be no lasting impact. In addition, it also recognises that “integrity issues and poor ethical behaviour can arise if a culture is overly focused on results at any cost”. As such, it recommends agencies to implement, as a priority, the SES Performance Leadership Framework which gives equal weight to values-based leadership behaviours and performance. This means that *how* public servants perform their role is as important as *what* they deliver in the job. By measuring the outcomes and their enabling behaviours, the leader is able demonstrate the value and necessity of both. Its goal is to incentivise good leadership that paves the way for pro-integrity culture in agencies.

The following elements of the Performance Leadership Framework must be included in SES performance policies and procedures:

- **Expectations for behaviours and outcomes:** SES leaders are expected to exemplify behaviours consistent with APS Values, the new APS Value of stewardship, and the DRIVE leadership behaviours: Dynamic, Respectful, Integrity, Value others, and Empower People.
- **Performance assessments:** These include formal and informal performance conversations, feedback from others and an annual performance rating.
- **Reward and recognition:** Agencies should reward employees who demonstrate exemplary behaviours and achieve outcomes.
- **Development:** Each SES individual is required to have a conversation with their supervisor at the beginning of their performance cycle to identify the SES employee’s development needs.
- **Unsatisfactory performance:** There must be clear policies and processes for dealing with unsatisfactory performance from the SES employee.

Source: *Louder Than Words, An APS Integrity Action Plan (2023)*, *SES Performance Leadership Framework (n.d.)*

## 6.2 The Leadership Shadow

The APS Integrity Action Plan's recommends the promotion of clarity for public servants on the unique nature of their role. In conjunction with mandatory welcome sessions for new SES, the SES Orientation program, established senior leaders can also reflect on the role and responsibilities of the SES and the importance of leadership 'shadow' in building a pro-integrity culture.

The leadership shadow is a model that the path to lasting change – in this case fostering a pro-integrity culture – starts at the top. This model was designed by a group of Australia CEOs, headed by the Sex Discrimination Commissioner, to advance gender balance in Australian organisations. It was designed to be a practical and flexible approach for leaders and their teams to understand their employee's perception of their leadership and how their behaviour and priorities can impact the acceleration of desired behaviours in their organisation. The following four steps directs the leader to reflect on their actions and its impacts:

- **What I say:** This includes values, context setting, message clarity, authenticity and emphasis.
- **How I act:** This focusses on the actions and decisions following from "what I say". This includes the leader's behaviours, symbols, and relationships with others that they develop to support values.
- **What I prioritise:** Employees notice what leaders spend time on: the disciplines, routines, and interactions that advance objectives.
- **How I measure:** The final step focusses on transparency. Rewards, recognition and accountability is telling of what really matters and reveals progress. Formal reporting mechanisms and measurement systems are examples.

*Source: [Louder Than Words, An APS Integrity Action Plan \(2023\)](#), [The Leadership Shadow \(2014\)](#), [The Leadership Shadow \(n.d.\)](#)*

## 6.3 Further examples

Other Leadership Interventions	Source	Jurisdiction
<b>Discussing psychological safety</b>	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Public Service Commission
<b>Well-publicised investment in leadership development</b>	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Public Service Commission
<b>Limit interactions with ministerial staff at the lower levels</b>	<a href="#">Victoria IBAC Operation Daintree special report</a>	Victorian Public Sector
<b>A letter of welcome emphasising the value of integrity</b>	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Public Service Commission
<b>A statement of practice for the relationship between ministerial offices and public servants</b>	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Public Service Commission
<b>Regular check-in conversations with SES about integrity concerns</b>	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Public Service Commission

Examples from Experts		
Applying the 'Three lines of defence' model to integrity management	Service Regulator	Victorian Public Sector
Revisiting and relaunching departmental values	Anti-corruption experts	Victorian Public Sector
Integrity Leadership Group	Anti-corruption experts	Victorian Public Sector

## 7 Relational (informal) practices

Informal practices, norms, and relationships play a crucial role in shaping ethical behaviour and integrity within organizations. While formal structures like codes of conduct and compliance programs are essential, the informal aspects of organisational culture often exert a more immediate and pervasive influence on daily behaviour. These informal elements encompass unwritten rules, shared understandings, and interpersonal dynamics that guide how employees interpret and respond to ethical situations.

The approaches to managing integrity in the workplace can be described as management control systems, to use the terminology from the management literature. Management control systems refer to “all the devices or systems managers use to ensure that the behaviours and decisions of their employees are consistent with the organization’s objectives and strategies” (Merchant & Van der Stede 2012, p. 6). They can be formal, for example, rules, policies, incentives; or informal, for instance, personnel and cultural controls which are not based on easily verifiable measures (Norris & O’Dwyer, 2004). Cultural controls are particularly interesting because they signify various ways in which organisational values can be conveyed to employees, something Chenhall (2003) calls a more “organic” approach. These ways are not codified and are instead used creatively and often rely on having a relationship-based approach to communication of integrity values.

The importance of interpersonal relationships and practices that strengthen these relationships with a goal to improve organisational integrity is reflected in a study by Brown (2005) who emphasizes the concept of “relational wholeness,” which refers to the quality of interpersonal relationships and their impact on organisational integrity. Brown argues that integrity is not solely an individual attribute but is deeply embedded in the relational dynamics among organisational members. Effective communication, mutual respect, and shared understanding among employees and between employees and management are essential for cultivating an environment where ethical behaviour is the norm. These relational aspects create a foundation for trust and accountability, which are indispensable for upholding integrity.

### 7.1 Integrity Awareness Week – Australian National Audit Office (ANAO)

In June 2023, the ANAO introduced an Integrity Awareness Week, an annual event that focussed on how to make integrity integral to their daily work. Throughout the week, three all-staff sessions were delivered: one presentation on the Integrity Framework, one covering the support provided to staff by the ANAO Integrity Advisor; and a presentation on the establishment of the National Anti-Corruption Commission. Videos featuring ANAO senior executives sharing what integrity means to them were also released for each day of the week. This week created awareness and built the capability of ANAO employees regarding their roles in the ANAO Integrity Framework.

In addition to presenting at the integrity sessions, the ANAO Integrity Advisor delivered integrity training sessions to graduates and new starters as part of the agency’s induction process. These sessions aim to increase the participant’s awareness of the Integrity Framework and principles that they should uphold in ANAO. In these sessions, participants also explore scenarios where integrity challenges may arise in the workplace and learn how to address integrity concerns.

Dedicating a week to ANAO’s integrity framework and principles build a shared understanding of integrity rules and values and build up their courage to discuss difficult or uncomfortable topics when integrity issues arise.

*Source: [ANAO Integrity Framework and Report 2022-23](#)*

### 7.2 Curious Conversations – the Independent Parliamentary Expenses Authority (IPEA)

The IPEA engages its staff in regular “Curious Conversations” about ethical scenarios and questions. Each conversation features an ethical scenario and questions for staff to discuss about the issues, challenges and risks presented by each scenario. Each ethical scenario also provides a risk assessment table for staff to access the

integrity issue, placing these scenarios in one or more of the following risks: reputational risk, operational risk, compliance risk and political risk.

*Source: [Curious Conversations: An Innovative Way to Learn About Risk Management \(n.d.\)](#), [Integrity Good Practice Guide: APS Integrity Taskforce \(2023\)](#), [OECD Public Integrity Handbook \(2020\)](#)*

### 7.3 Further examples

Other Relational Interventions	Source	Jurisdiction
<b>Thank you cards</b>	<a href="#">APS Good Practice Guide</a>	Department of Infrastructure, Transport, Regional Development, Communications and the Arts, Australian Government
<b>Uncomfortable feelings</b>	<a href="#">APS Good Practice Guide</a>	Department of Infrastructure, Transport, Regional Development, Communications and the Arts, Australian Government
<b>Accountability Incubator</b>	<a href="#">OECD Observatory for Public Sector Innovation</a>	Pakistan
<b>Informal discussions of integrity standards</b>	<a href="#">OECD Public Integrity Handbook</a>	N.A.

## 8 Communication with public

The public can aid the public sector in the fight against integrity violations when they adopt principles and values of integrity. Communicating clear standards of integrity and ethical behaviour to citizens is essential for fostering trust and accountability. When governments articulate what constitutes ethical conduct for public servants, they empower citizens to understand their rights and expectations in their interactions with public institutions. This transparency allows the public to recognize both proper and improper behaviour, which is especially important in contexts where power imbalances may discourage individuals from speaking up.

Moreover, when standards of integrity are actively communicated, for example through charters, websites, signage in government offices, and citizen engagement initiatives, they become shared reference points that can help facilitate respectful, constructive interactions. This shared understanding also enables citizens to better navigate processes such as lodging complaints, providing feedback, or engaging in participatory governance. Research by Boyd-Swan and Molina (2019) suggests that citizen perceptions of value congruence with public administrators play a significant role in assessing public service integrity and the quality of governance. In this way, public communication of integrity standards not only supports ethical conduct among officials but also promotes an informed, empowered citizenry.

### 8.1 Pro-Integrity Badge for Businesses engaging with the Public Sector – Jalisco, Mexico

In the State of Jalisco, Mexico, the Pro-Integrity Badge is a strategic initiative that bridges the government and the business sector to promote a culture of integrity. It rewards companies that establish comprehensive integrity policies – including codes of conducts, internal controls, monitoring and auditing systems, and whistleblowing systems – by rewarding them with the Pro-Integrity Badge. As of 2021, 40 out of 86 companies who registered for the Pro-Integrity Business Badge was awarded the badge on the basis that their integrity policy aligned with the seven elements of the General Law of Administrative Responsibilities.

This initiative benefits both the business sector and the public sector. Obtaining the Pro-Integrity badge grants companies with more competitive advantages, as they are seen as a better option for doing business. Importantly, it aims to incentivise businesses to align and comply with Mexico's national anti-corruption laws and recovers citizens confidence in government. It also shows that a joint effort by the government, business chambers, and civil society organisations are important in promoting a unified approach to combating corruption.

The goal of this initiative is to only communicate expectations of standards of integrity by citizens, in this case, the business sector, but also to encourage them to implement ethical conducts by recognising citizen efforts to implement robust integrity policies.

Source: *Pro-Integrity Badge (2021)*

### 8.2 Further examples

Other Communication with the Public Interventions	Source	Jurisdiction
Establish and communicate clear expectations of conduct to citizens and companies	<a href="#">OECD Public Integrity Handbook</a>	N.A.
Integrity clubs	<a href="#">Integrity Action</a>	N.A.

## 9 Data

Utilizing data to foster pro-integrity cultures within public institutions involves several key strategies. Firstly, developing metrics to assess integrity allows organisations to monitor ethical behaviour and identify areas for improvement. Secondly, collecting and analysing enforcement data provides insights into the effectiveness of integrity measures. Thirdly, evaluating the effectiveness of integrity measures through data is essential for fostering a culture of accountability and continuous improvement within public institutions. The OECD's Public Integrity Indicators provide a comprehensive framework for assessing government resilience to corruption risks. Finally, developing guidance on interpreting data to recognize integrity risks is essential for fostering ethical practices within public institutions. The OECD's *Analytics for Integrity* (2019) report emphasises the importance of utilising data analytics to support corruption and fraud risk assessments. By leveraging data analytics, government agencies can proactively address potential ethical challenges and foster a culture of integrity.

### 9.1 Risk Registers – the Irish Health Service Executive (HSE)

The Irish HSE has developed a risk register as a powerful tool for systematically identifying, assessing, and managing risks to ensure the delivery of healthcare services.

Each line manager is responsible for developing a risk register in their area of responsibility. This register is then shared with all employees working in the service as clearly and comprehensively as possible. A critical component of the risk register is an action plan to address additional controls to reduce risks to an acceptable level. Any additional controls that cannot be managed at the service level may be referred to the next level of management. Risks that cannot be eliminated for practical or other reasons, must, nevertheless, be recorded in the risk register alongside a list of controls to reduce the risk to an acceptable level. These accepted risks will then be monitored regularly.

HSE has identified four pre-requisites for developing a sound risk register:

- **Availability of risk expertise:** Staff supporting the process will receive education, training, and coaching.
- **Use of approved support material and tools:** Ensure consistency throughout the process by only using approved documents and tools.
- **Commitment and ownership:** Visible commitment from senior leadership to promote buy-in from stakeholders to ensure the maintenance of the completed register.
- **Availability of site ownership:** Administrative support is required for developing risk registers, e.g. facilitating and organizing workshops, coordinating the process.

Risk registers are not meant to be static documents, rather they require regular monitoring, updates, and reviews to reflect the evolving risk landscape in organisations.

*Source: OECD Public Integrity Handbook (2020), [Developing and Populating a Risk Register Best Practice Guidance \(2009\)](#)*

### 9.2 Integrity Metrics Resource – APSC

The APSC has published an Integrity Metrics Resource to support agencies to understand their current integrity measurement capability and how to measure integrity in their agencies.

It states that measuring integrity performance is good practice to make informed decisions on where to focus future effort. In addition, it notes that agencies that effectively measure, monitor and report on their integrity performance are better positioned to identify and remedy integrity risks. It also encourages monitoring integrity measures over time as trends related to integrity might also emerge within the agency.

The Integrity Metrics Resource contains three tools: the Integrity Metrics Maturity Model, the Integrity Metrics Register, the Integrity Dashboard.

Agencies are encouraged to start with the Integrity Metrics Maturity Model, which is a self-assessment tool that establishes their current level of maturity, whether they belong to “initial, “defined” or “optimised” stages of maturity. Measurement indicators include their level of measurement and monitoring of integrity, data complexity, integrity governance process, frequency of integrity measurement, and performance management.

Depending on their level of maturity, agencies develop metrics specific to their agency. The Integrity Metrics Register provides examples of a range of metrics that can be used to measure agency and employee integrity.

The Register includes a list of metrics across four categories:

- Human resources
- Declarations and self-reporting
- Security
- Risk, fraud and corruption.

Each metric includes a description, examples and indicators that are relevant to measuring integrity. An example is given below.

#### **Human Resource Metric**

- Metric: Employee perception survey data
- Description: Responses to integrity related questions including perceptions of behaviours or integrity issues.
- Examples: Questions in the APS Employee Census relating to APS Values, bullying and harassment, corruption, and fraud
- Integrity indicators: Responses may indicate integrity concerns and levels of integrity awareness and capability.

Source: *[Louder than Words: An APS Integrity Action Plan \(2023\)](#), [Integrity Metrics: Resource \(2022\)](#)*

### **9.3 Including questions on integrity in agency surveys or equivalent surveys**

According to the APS’ guide to Handling Misconduct: A human resource manager’s guide, agencies are encouraged to gather data about the conduct of their employees to help improve processes and culture, especially about susceptibilities, workplace norms and cultures, and how integrity is understood and manifested in the agency. Data collection can be done in a range of ways, including establishing a case management system, to spreadsheets depending on the agency needs. One of the recommended methods is for agencies to utilise their own agency-specific data from the annual APS Employee Census or regular internal surveys. The following two surveys are examples of how agencies can assist in understanding the overall employee knowledge of integrity and integrity culture of the agency and in the APS.

#### **Example 1: Annual Agency Survey**

The APSC conducts an annual survey to collect data and workforce metrics from APS agencies with at least 20 employees under its Public Service Act (1999). The survey’s content is determined by the current-day priorities of the Public Service and ensure that the APS’ workforce planning, strategies, and initiatives are data-driven, uphold legislation and to meet the needs of the APS. The survey collects data on the number of employees investigated



for a suspected breach of the Code of Conduct and the number of employees found to have breached the Code of Conduct. The APS Integrity Report recommends that the APSC include a question in its annual agency survey on whether and how integrity is rewarded and recognised to review reward and recognition processes to acknowledge those who lead with integrity.

### Example 2: APS Employee Census

The APS' Handling Misconduct guide recommends that agencies use key indicators of integrity levels, such as the proportion of employees witnessing corruption, whether witnessed corruption is reported, and reasons for not reporting corruption, to analyse levels of staff's understanding of the APS conduct framework and as an indicator whether employees feel safe to speak or if there is fear of reprisal upon reporting.

*Source: [Louder Than Words: An APS Integrity Action Plan \(2023\)](#), [APS Agency Survey \(2021\)](#), [Handling Misconduct - A Human Resource Manager's Guide \(2021\)](#), [State of the Service Report: 2022-23 \(2023\)](#)*

## 9.4 Further examples

Other Data Interventions	Source	Jurisdiction
<b>Identify best practice for measuring integrity both within agencies and across the APS</b>	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Public Service Commission
<b>Guidance on interpreting integrity data</b>	<a href="#">APS Louder Than Words: An APS Integrity Action Plan</a>	Australian Public Service Commission
<b>Collate and publicise enforcement data</b>	<a href="#">OECD Public Integrity Handbook</a>	N.A.
<b>Proactive and innovative evaluation of the effectiveness of integrity training</b>	<a href="#">OECD Public Integrity Handbook</a>	N.A.
<b>Examples from Experts</b>		
<b>Annual integrity performance report</b>	Anti-corruption experts	Victorian public sector

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