

# ANTI-CORRUPTION HELPDESK

PROVIDING ON-DEMAND RESEARCH TO HELP FIGHT CORRUPTION

## IMPLEMENTING CODES OF CONDUCT IN PUBLIC INSTITUTIONS

### QUERY

Are there successful models for implementing codes of conduct in public institutions and practical tools and indicators that could assess the implementation of code of conduct articles in public institutions?

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### SUMMARY

Many countries have adopted a code of conduct to provide guidance to public officials on ethical values and behaviour.

However, codes need to be effectively implemented to instil a culture of integrity and transparency. While there is no guaranteed formula for successful implementation, there are some elements that can help the implementation process including: a participatory development process, strong leadership, ensuring the code is embedded in a wider integrity management framework, structures and mechanisms for guidance, monitoring, review and enforcement, clear dissemination and capacity building plans, and creating incentives for compliance.

While the literature on measuring implementation is somewhat limited, there are some methods for assessment. In addition to the work done by academics, some governments have developed their own self-assessment toolkits to help evaluate the state and extent of implementation.

## 1. OVERVIEW

Many countries have adopted a code of conduct<sup>1</sup> to provide guidance to public officials on ethical values and behaviour. These codes can be instrumental in promoting integrity, openness and transparency. The adoption of a code of conduct sends a strong signal that the organisation is committed to adhering to the highest standards of integrity and that ethical behaviour is expected from all officials (Chêne 2013). Codes of conduct can also help clarify internal procedures, insert greater transparency in the institution's management and operations as well as create standards against which the organisation can be held accountable (Chêne 2013).

The role of a code of conduct is to inform and guide thinking by helping users understand the deeper moral dimensions of any specific situation and informing them of the standards that apply to that situation and helping them through a process of ethical evaluation (IDB 2007). Codes of conduct aim to demonstrate a commitment to ethical behaviour, enhance the organisation's reputation, support harmonious relationships within the organisation, enhance relationships with third parties, manage risks associated with ethical decision-making, set out a standard of behaviour within a disciplinary framework, demonstrate effective governance arrangements, and provide effective ethical guidance and support (CCAB 2014).

While it is difficult to measure the impact of codes of conduct, their potential for impact is significant. However, their impact depends strongly on how codes of conduct are implemented. Experts agree that a code alone will do little to instil a culture of integrity and transparency. To be effective, a code must be translated into practical action and be embedded in an organisation's overall ethics framework.

## 2. ELEMENTS OF SUCCESSFUL IMPLEMENTATION

While there is no exact formula for successful implementation, there are nonetheless some elements that can help in implementation, including:

- (i) a participatory development process
- (ii) strong leadership
- (iii) ensuring the code is embedded in a wider integrity management framework
- (iv) structures and mechanisms for guidance, monitoring, review and enforcement
- (v) dissemination
- (vi) building capacity
- (vii) creating incentives for compliance

### Participatory development process

Before a code of conduct is implemented, it first goes through a development process. To promote successful implementation of the code, countries can consider a participatory development process, with extensive consultation with key stakeholders during each phase of the development process so that the content of the code can be owned, understood and implemented by government officials.

Participatory involvement in the development process can occur at each stage of the process. For example, in the planning phase, the Ethics Resource Centre's [Model 12 Step Development Process](#) recommends creating a task force or committee consisting of a diverse group of people from the organisation that is responsible and accountable for the code's development. In the design phase of the development process, the Ethics Resource Centre recommends gathering information from stakeholders (such as the organisation's leaders, employees and volunteers) on key ethics concerns (Ethics Resource Centre 2001). This type of information can be done through interviews, focus groups or informal discussions. During the code drafting phase, the Ethics Resource Centre suggests seeking multiple perspectives on developing a code. Before the code is finalised, it should also be "field tested" to gather any final suggestions and revisions (Ethics Resource Centre 2001).

Beyond employees of the organisation, a participatory development process can also involve other stakeholders and members of the community. In Austria, for example, the 2008 code of conduct was developed by a special working group consisting of experts from all ministries and the highest offices and from regional and local authorities, as well as trade

<sup>1</sup> For information on the content of codes of conduct, see the Helpdesk answer on [codes of conduct for local governments](#).

unions. Input by the community and service users can also be gathered by conducting surveys to determine the values and concerns of the community and government employees and establish priorities (UN Habitat and Transparency International 2004).

### The role of leadership

Leadership is crucial to both the development and the implementation of the code, as leaders of organisations help shape the norms and culture of an organisation. A code's consultation and development process should have support from the highest level of the organisation (Holm and Lillywhite 2003). Leadership buy-in should be secured from the very beginning of the process, and leaders should be informed, consulted and have an opportunity to review the code at every step (Ethics Resource Centre 2003). This will help ensure their support.

Once a code is agreed upon, it should be endorsed at the highest level to demonstrate commitment from the top (Chêne 2013). The code could include, for example, a "leadership letter" that explains the need for and importance of the code (Institute for Local Self Government 2003). In Lithuania, for example, the development of a code of ethics was endorsed by the president and supported by a Parliamentary Working Party (Lawton 2004).

As role models, leaders need to also behave in accordance with the code. One approach to the implementation of codes of conduct is to phase the adoption and to apply it to senior officials first (OECD 2010). This will set the tone from the top.

### Embedded in integrity management framework

A code of conduct should be rooted in an overall integrity management or ethics framework. It should be but one measure in an integrated and sustained ethics initiative (IDB 2007).

Where an appropriate framework is already in place, this involves ensuring that the code is consistent with existing legislation and procedures in order to avoid ambiguity (Holm and Lillywhite 2003). Where such a framework is missing, it involves creating this

framework as a standalone code will not effect much change (Lawton 2004).

Some elements of this framework could include, for example, access to information laws, ethical training and education programmes, strong internal and external accountability mechanisms (particularly financial ones), whistleblower protection, and complaint mechanisms (Lawton 2004, Whitton 2001). Financial disclosure programmes can also be useful. Beyond a declaration of assets, an effective financial disclosure programme can account for sources of income and be applied before officials are appointed (OECD 2010). A gifts registry can also be useful (OECD 2010).

In Austria, for example, the ethical values of its public administration are embedded in a wider legal ethics framework (OECD 2010). Ethical values are integrated in the Austrian Criminal Code, the organisational principles embodied in the constitution, the Civil Servant Service Act of 1979 and the Act on Contractual Public Employees of 1948. Similar rules can also be found in the different service laws of the Austrian provinces. To add to the existing integrity framework, a code of conduct for the civil service was issued in 2008.

### Structures and mechanisms for guidance, monitoring, review and enforcement

#### *Identifying administrative structures for implementation*

Establishing a specific administrative structure with the mandate of implementation is seen as a precondition for the successful implementation of a code of conduct (OECD 2011). This involves defining a clear implementing authority that maintains continuity in implementing, monitoring and reviewing the code. The implementing authority would also be in charge of developing an implementation plan that articulates its communication and training strategies (OECD 2011).

There are different approaches, as outlined by the OECD (2011). Some countries assign the responsibility to an entity in charge of designing and

coordinating administrative development. This is the case in Canada, for example, where the Treasury Board monitors the implementation of the Values and Ethics Code in departments and agencies as part of its role. Others administer the code through an entity responsible for implementing human resource policies, such as in Australia.

Some countries create a new implementing public entity such as a citizen's board or an ethics commission, as is the case in the State of Ohio in the United States (see below). In fact, the State of Ohio in the United States was among the first states to create a uniform Code of Ethical Conduct (OECD 2010). It enacted new ethical standards for all public officials and employees of the state, both at state and local level within Ohio, whether elected, appointed or serving in civil service positions.

The Ohio Ethics Commission, composed of citizen members, has jurisdiction over the Ethics Law (OECD 2011). The commission was established to ensure the implementation of the Code of Ethical Conduct, provide guidance to public officials on the code, monitor the disclosure of financial interests of public officials and investigate conflict of interest situations.

Ohio's code of conduct and its implementation has also served as an example to other countries. According to a study by the OECD (2010), the long-standing implementation of Ohio's code of conduct provided long-term perspectives for the government of Jordan in implementing its own code of conduct in the public sector.

### *Guidance*

Following the establishment or identification of appropriate administrative structures, these structures need to have systems and a mandate in place so that they can effectively guide and monitor the implementation process as well as enforce it in practice.

As the OECD (2010) notes, the first months of implementation in particular are sure to bring many unforeseen questions about the code, its application and interpretation. Effective integrity programmes therefore provide guidance on ethical dilemmas.

Human Resources and Skills Development Canada<sup>2</sup> (HRSDC), the Canadian government department responsible for developing, managing and delivering social programmes and services, provided guidance to employees on the code of conduct by developing toolkits, presentation decks on the code, frequently asked questions fact sheets and code-related games (HRSDC 2013).

Another approach for offering guidance to employees is, as part of the implementing administrative structure, to set up an independent mechanism (such as an ethics committee) that allows staff to raise ethical issues and provides guidance for solving those issues. This gives officials the means to seek advice about a matter before they act. These mechanisms require confidentiality of the requestor's identity and the ability to confidently rely on the advice given (OECD 2010).

Some institutions have also trained a number of "ethic guides" across the institution; as an internal resource for their peers, they provide support in working with ethical dilemmas and taking action where appropriate (Holm and Lillywhite 2003). This is the case in one of Canada's governmental units, which has supported a regional advisor position within the branches of each of Canada's four regions to reinforce the rollout of the code (HRSDC 2013).

In the US, some government agencies have hired ethics advisors and counsellors to help staff with advice on ethical dilemmas, settle disagreements and provide oversight of the ethics infrastructure (Michael and Hajredini 2011).

### *Monitoring and review*

Successful implementation also requires effective monitoring of breaches of the code as well as reviewing and updating the code itself.

An effective monitoring system can help track to what extent the code is being adhered to or transgressed against. A monitoring system can also identify trends on ethics and integrity across the organisation. However, this requires having a system in place that allows this kind of sharing of information between different branches and departments (HRSDC 2013).

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<sup>2</sup> Rebranded to "Employment and Social Development Canada" in 2014.

Without such information sharing, there is a risk that senior management do not have a comprehensive understanding of ethics and integrity risks at the organisation and may impact management's ability to make effective ethics-related decisions in the future.

A monitoring process can also help provide information to determine whether a code of conduct needs revisiting. After all, a code of conduct that is not contemporary becomes irrelevant. Therefore, codes, guidelines and any related information should continually be revisited in light of any changes that may occur in the organisation or its environment (Ethics Resource Centre 2001). This can also send a message to employees that ethics is an area that requires – and in fact receives – ongoing attention (Ethics Resource Centre 2001).

Other sources of information for this type of review are public feedback and complaints mechanisms (Michael and Hajredini 2011). Most government agencies now use feedback and complaint hotlines to monitor the ethics-related behaviour of civil servants (Michael and Hajredini 2011). Usually a specialised unit collects complaints and forwards those involving potential crimes to the police and those involving ethical violations to the person's supervisor, human resources department and the in-house counsel (Michael and Hajredini 2011). Conducting regular or ad hoc surveys of individuals using government services can also provide information on not only customer satisfaction of the service but also report on any unethical experiences (Michael and Hajredini 2011).

### *Enforcement*

Consequences, enforcement and the consistent application of disciplinary procedures to an employee who has committed a breach of the code is seen as a key element of every employee management framework (HRSDC 2013). It is no different for the enforcement of a code of conduct. Ensuring continuous enforcement of the code is therefore a crucial element of its implementation. This involves creating procedures for investigating allegations and imposing sanctions on those who violate the code (Chêne 2013). It may also require determining jurisdiction and identifying which governmental entity or independent agency will have authority to interpret and enforce the code (Chêne 2013).

Moreover, an effective enforcement programme can also include publicising breaches and discussing disciplinary actions stemming from an investigation with employees (HRSDC 2013). This helps raise awareness to the consequences and ensure consistency of disciplinary action (HRSDC 2013). It also shows that application of the code is taken seriously. In addition, code violations and subsequent disciplinary procedures can also serve as case studies that can be used to make ethics and integrity relevant to employees' daily activities and serve as a deterrence tool (HRSDC 2013).

### **Dissemination**

A code's implementation depends on the awareness of those the code applies to. Therefore, a crucial element of implementation is dissemination of the code. Officials need to be aware of the code and to understand the rules, obligations and expectations of the standards to which they must adhere.

When designing and developing a dissemination plan, organisations should think carefully about who needs the information and how one can best get it to them in an effective manner. Communication can take many forms including ethics training, newsletter articles, posters, e-mails, formal and informal discussions of ethics. The code could also be launched at an event involving the institution's leadership and other important contributors to the code (Ethics Resource Center 2001). The code should also be promoted externally as well as internally, by, for example, talking up the code in presentations and with community leaders (Institute for Local Self Governance 2003).

Dissemination can also begin before an employee is even hired. The Institute for Local Self Governance (2003) suggests "recruiting with ethics in mind." Namely, the code of conduct could be referred to in application material, an ethical dilemma question could be included in the interview and organisations could require the code to be signed upon joining the team.

Every organisation needs a process for ensuring that its code and its supporting communications and training strategies continue to reflect the organisation's ethical priorities (Ethics Resource Centre 2003). After all, a code that is not current is

also one that is not relevant (Ethics Resource Centre 2003).

There have been some innovative approaches to bringing codes to life. For example, in the city of Amsterdam in the Netherlands, the municipal government summarised the key points of its code of conduct on a small card that is distributed to all employees, temporary employees and contractors (Nijhof et al. 2003). One department even invited theatre actors to organise a performance about the code (Nijhof et al. 2003). In Austria, the code of conduct was communicated through articles in newspapers and special informational events (OECD 2010).

It is also important that the code is distributed to those who do business with the organisation. For example, it could be attached to requests for proposals and calls for applications or generally mailed to all vendors (Institute for Local Self Governance 2003). In countries such as UK or Australia much of the work of the public services is contracted out, so it is important to disseminate the code to contractors (Lawton 2004).

### Building capacity

Beyond raising awareness, experts also advocate for building capacity as some unethical practices can result from ignorance and incompetence (Lawton 2004). Training courses can help staff internalise the ethical thinking that shapes the code and defines the organisation's values and principles (IDB 2007). There are various types of capacity-building activities, including competency-based trainings that strengthen knowledge of the subject-matter, reasoning skills, problem-solving skills, advocacy skills, self-awareness and consensus-building skills (Chêne 2011).

It has also been argued that capacity-building strategies should be adapted to the ability of each organisation's employee base to follow ethical rules (Michael and Hajredini 2011). These strategies should help strengthen the skills needed to resolve ethical dilemmas and provide mentoring and on-the-job training to staff who are willing but not able to follow ethical rules (Michael and Hajredini 2011).

Many countries have carried out training programmes

in their public institutions. For example, in order to ensure effective implementation of the Austrian code of conduct, a special training programme based on a multi-level training approach was launched by the Federal Administration Academy in March 2009 (OECD 2010).

In Jordan, many of the respective public institutions have their own training programmes to train employees about both the national and institutional codes of conduct (OECD 2010). However, due to the varying degrees of capacity and ethical awareness, experts suggest that it is also important to train the trainers (OECD 2010). Some also suggest using different, more interactive activities during training, such as role playing, joint problem-solving and the use of hypothetical situations (OECD 2010).

### Creating incentives for compliance

Creating incentives for compliance is seen to be particularly important in public institutions in which staff do not have the desire to follow ethical rules (Michael and Hajredini 2011). Interviews with Jordanian officials in the course of a 2010 OECD study found that officials indicated that codes of conduct will only work when the emphasis is on incentives rather than punishment. Creating incentives for compliance may therefore help in successfully implementing codes of conduct.

There are many approaches to creating incentives. One of these includes linking adherence to codes of conduct to performance management policies and systems. These can begin early on. In the municipality of Amsterdam in the Netherlands, managers provide employees with an introduction to the code during the first appraisal interviews (Nijhof et al. 2003).

In the Jordanian civil service, several institutions employ specific incentive systems. In the Audit Bureau, incentives and bonuses are linked to employee performance evaluations that also include elements on integrity, transparency, credibility and impartiality in work (OECD 2010). The incentives that are offered in return for positive performance reviews range from free training in English to financial assistance in the form of housing loans funded by

employee contributions (OECD 2010).

### 3. ASSESSING IMPLEMENTATION

There are a limited number of resources on assessing the implementation of codes of conduct. Many of the assessments that are carried out are self-assessments by government institutions themselves and it is not always possible to access the results or see the methodologies or the tools and indicators used for assessment. Nevertheless, there are some examples and case studies that provide useful information.

#### Nijhof et al. self-evaluation model

##### *Methodology and indicators*

One of the few academic papers on assessing code of conduct implementation is the assessment carried out by Nijhof et al. (2003). Their assessment model is based on the self-evaluation methodology that is used by management systems such as the European Foundation for Quality Management<sup>3</sup> (EFQM) model. Nijhof et al. (2013) use this model under the premise that a code of conduct is to be a starting point from which to shape a responsible organisation. Through this self-evaluation – carried out through questionnaires sent to a cross-section of the organisation – an organisation can see to what extent it has taken action to improve its track record in various fields and determine which activities deserve priority. The assessment method can also be used by stakeholders who wish to know to what extent an organisation attends to its code of conduct.

Nijhof et al. (2003) have developed a list of indicators that could be used in these assessments. They are categorised by the different processes in organisational “responsibilisation”<sup>4</sup> (identifying and removing barriers, coding, internalisation, enacting, monitoring, accountability) and the different organisational areas (leadership, policy and strategy, people, resources, processes). These indicators are:

- (i) Identifying and removing barriers: incidents and dilemmas are being consistently registered and categorised.
- (ii) Coding: the code reflects concrete dilemmas which occur in daily business practice.
- (iii) Internalisation: the code contains indications which refer directly to the activities of the employees.
- (iv) Enacting values: there are short feedback loops so that employees are quickly informed whether or not they have behaved according to the code.
- (v) Monitoring: internal process risks are registered and monitored whenever possible.
- (vi) Accountability: exemplary projects are transparently and widely communicated within the organisation.
- (vii) Leadership: the head of the organisation consequently indicates what the important values within operational management are.
- (viii) Policy and strategy: the strategic policy of the organisation indicates the long-term importance of the code of conduct.
- (ix) People: the code serves as a framework for formal and informal functioning and appraisal interviews.
- (x) Resources: the organisation is prepared to concede to financial results if the code demands it.
- (xi) Processes: the organisation has made a risk inventory to discover bottlenecks concerning responsible and irresponsible behaviour.

##### *In practice: the city of Amsterdam*

Based on these indicators, Nijhof et al. (2003) organised a self-evaluation that was carried out in the municipal government of Amsterdam to test the practicality of their assessment. The municipality developed a code for the entire municipality in 1998 following a series of fraud and corruption incidents. The code is but one element of the integrity policy of the municipality and it includes mandatory self-assessments by each department and each district of the municipality. The self-assessments led to the conclusion that the integrity policy needed improvement in all departments and districts. As such, a Bureau of Integrity was set up in 2001 that

<sup>3</sup> The EFQM model determines the strengths and weaknesses of an organisation and identifies areas for improvement.

<sup>4</sup> The process of enhancing organisational responsibility and also moral competence of individuals within the organisation.

was tasked with facilitating the implementation of the code in the various departments of the municipality.

To assess the status and effectiveness of implementation, the self-evaluation was carried with managers of different departments and city boroughs, in particular those managers who contributed to the implementation of the code of conduct. The evaluation found that overall the enactment of the code was seen to be relatively underdeveloped (Nijhof et al. 2003). For example, though the municipal government intended to translate the principles of the code in clear guidelines, some of these guidelines sent contradicting messages to the employees. Specifically, although it was decided that employees could accept no gift whatsoever, the code allowed employees to accept gifts with a value below €45. The evaluation therefore highlighted important weaknesses in implementation.

### Self-assessment checklists

Some countries carry out regular self-assessments of their implementation. In New Zealand, for example, the State Services Commission has published a checklist that departments can use to determine the status of their implementation of the Commissioner's code of conduct, which describes the core principles and standards of conduct of public servants.

The checklist is organised to reflect the six elements of "trustworthiness" that state services are encouraged to use. Below is an extract of some of the items of this checklist, as these may be able to serve as indicators for others:

- (i) Element 1: agencies of the state services have standards of integrity and conduct that meet the State Services Commissioner's minimum standards.
  - Ensure that all policies, procedures and training are consistent with the code of conduct. Specify in employment agreements that staff are subject to the standards of the code.
- (ii) Element 2: agencies of the State Services promote their standards of integrity and conduct.
  - State service organisations assist understanding and compliance by,

inter alia, displaying the code in work areas, tea rooms, meeting rooms, etc., ensuring the code is available on the organisation's intranet, and integrating training courses on the code of conduct in induction courses.

- (iii) Element 3: standards of integrity and conduct are integrated into the behaviour of state servants.
  - Organisations include the achievement of high standards of integrity and conduct in performance review processes, ensure that integrity standards are identified in selection criteria for jobs and send the code to candidates prior to job interviews.
- (iv) Element 4: managers model the standards of integrity and conduct in their behaviour.
  - Leaders throughout the organisation encourage regular discussion of the standards as they apply to the work of their organisation and require direct reports on actions taken to promote the code.
- (v) Element 5: the consequences for behaviour that breaches the standards of integrity and conduct are known by state servants.
  - Ensure process for reporting behaviour that breaches the code is available on the intranet, staff manual or other conduct-related documents. Organisations also ensure that there is feedback to staff who report concerns about possible code breaches acknowledging their commitment to reinforcing the code.

### Internal audits

Many countries carry out internal audits of their government agencies. In addition to checking for fraud, these audits can help identify major risks which should be included in a code of conduct, assess its effectiveness and provide recommendations for improving performance (Michael and Hajredini 2011). In assessing its effectiveness, internal audits can assess the extent to which codes and regulations actually change behaviour, the extent of compliance



with various provisions of the code or look at the working arrangements related to the code (Michael and Hajredini 2011).

For example, Human Resources and Skills Development Canada recently carried out an audit to determine the implementation of the code of conduct in the department. The auditors reviewed the key documents relating to the code and its implementation policies, interviewed stakeholders and conducted walkthroughs of processes related to breaches of the code (HRSDC 2013). Auditors interviewed the functional leaders of the code as well as representatives from the Office of Informal Conflict Resolution and representatives from the four regions to assess the effectiveness of the policies, tools and guidelines used to promote awareness and develop knowledge around the code.

Overall, the audit found that the department had adequately implemented the code across the regions and branches using a variety of outreach, awareness and communication activities. However, it also noted some areas for improvement (HRSDC 2013). For one, it concluded that the OVE should have a formal monitoring and reporting framework in place that ensures that communication and training activities are appropriately monitored and adjusted as needed. The audit also noted that the OVE needs clarity in its objectives and vision, otherwise it may risk that the application of the code is inconsistent across regions and branches. Lastly, as the department does not widely publicise breaches or discuss disciplinary actions, there is limited awareness of consequences of breaches of the code, thus risking inconsistency of disciplinary actions.

As a response to the audit, the department's management has committed to alleviating the noted areas of improvement including developing a monitoring framework, a planning process for developing a clear vision and objectives, and a forum of senior management to discuss statistics and trends in ethics and integrity (HRSDC 2013).

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