

Transparency International Anti-Corruption Helpdesk Answer

Integrity training for public officials

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Date: 3 March 2022

Integrity training for public officials aims to raise awareness about integrity standards and corruption prevention in the public sector. They can focus on various areas including codes of conduct and ethics, conflict of interest, ancillary activities, pre and post-employment rules, proactive disclosure and others. Recent experiences from countries that provide integrity training suggest there is a growing use of e-learning tools that combine theory and interactive material in the form of videos or case based scenario exercises. These types of training provide more flexibility and are cost effective, which are important considerations when resources are limited. Evaluations on the effectiveness of some of this integrity training suggest the benefits of short, thematic modules and interactive content for efficient learning. Moreover, they indicate the importance of engaging various experts in the design of integrity training, including anti-corruption trainers, compliance officers, investigators, IT experts and psychologists.

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The Anti-Corruption Helpdesk is operated by Transparency International and funded by the European Union.



Query

Please provide an overview of international examples/best practices on awareness raising for civil servants and government officials on issues of integrity and anti-corruption.

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Introduction

Public integrity refers to a devotion to shared ethical standards and values for sustaining public interests over private ones in the public sector (OECD 2017). Public integrity training can be a

Main points

- Integrity training for public officials aims to raise awareness to existing integrity standards and anti-corruption.
- This training can cover various areas, such as codes of conduct and ethics, conflict of interest, asset and income disclosure, ancillary activities, lobbying transparency and others.
- Recent practice suggest a widespread use of online training due to its flexibility and cost-effectiveness, which combine theoretical information, videos and interactive case scenario exercises.
- Existing countries' experiences suggest increased effectiveness from combining theory and practical case examples.
- Evaluations of this training in some countries suggest the benefits of short, thematic modules and interactive tools. The engagement of various experts – such as anti-corruption trainers, compliance officers, IT experts and psychologists – in designing integrity training has also shown to be beneficial.

valuable tool to strengthen awareness about corruption prevention in the public sector as part of a broader and comprehensive anti-corruption framework (OECD 2013: 9).

Organising such training is important as it provides an opportunity to stress shared values among employees of a public body while also functioning as a corruption prevention mechanism. For example, induction training can be an efficient way to initially communicate the organisation's values to a public servant joining that organisation (OECD 2013, 2018: 40). Integrity training can also help public servants recognise potential integrity issues once they occur in their place of work and understand how to adequately address and manage them (OECD 2020).

Training can cover various aspects of the anti-corruption framework (which will be discussed in the following section) such as codes of conduct and ethics, conflict of interest rules and procedures, disciplinary measures for public servants and asset disclosure (OECD 2005, 2013; Korruptsioon.ee, no date). Through the training, employees can understand what conflict of interest is, how to react when it occurs and how to recuse themselves. Training on lobbying transparency can address questions of how and where to register contacts with lobbyists, how to verify that lobbyists are registered, and so on. Training on ancillary activities, for example, can address questions of incompatibility of offices, recognising whether an ancillary activity is allowed and what the procedures are for reporting it.

Although measuring the effectiveness of integrity training is a challenging task due to the fact that such training courses are typically evaluated using activity level indicators (such as the number of public servants trained), there is some evidence suggesting that they can be effective in building resilience and commitment to integrity.

In particular, integrity training can be embedded into broader methods to ensure professionalism, such as by including active participation in such training as part of an employee's performance assessment (Polaine 2018: 45). It is important to note, however, that the training should be considered just one part of the comprehensive anti-corruption framework (OECD 2013; Luijken 2014). Attention needs to be paid to the broader political economic context when designing capacity

building measures (Polaine 2018: 45). Further, having a realistic and effective sanctioning system is one of the important elements as well. Consequently, training dealing with duties and expectations of public servant behaviour can be complemented with information on penalties imposed where these duties and obligations are flouted.

Behavioural science provides some useful insights into what types of public integrity training is most effective (Whitton 2009). Studies suggest that integrity trainings should combine both learning rules and principles as well as building knowledge and problem-solving skills (Jackson and Köbis 2018: 36). In this sense, didactic methodologies based on case-scenarios may be the most effective (Whitton 2009; Jackson and Köbis 2018). Some evidence suggests that training based on realistic scenarios is more likely to lead to a personal commitment to integrity than simple presentations by trainers (Bazerman and Tenbrunsel 2011; OECD 2018).

Further, dilemma training has been used in some contexts, and it can build on behavioural insights. Namely, training participants can be faced with situations from the past in which they behaved in an unethical way. They then need to react to this moral dissonance with a positive action (OECD 2018: 40).

To achieve sustainable capacity building, integrity training should be repeated regularly and tailored to the needs of specific target groups (OECD 2018: 40). Comparative evidence suggests that the time dedicated to integrity training is limited, considering the number of relevant topics for public sector that need to be covered. As shown in Figure 1, there is a decline in the number of governments that reported having training lasting 7 to 10 days.

Limited resources are often an obstacle to providing a comprehensive coverage of integrity issues. However, modern training methods, which will be discussed in the following sections, may provide cost effective solutions to these challenges. Moreover, in the context of limited resources, governments can time the training to coincide with important changes in ethics or public service regulations, codes of conduct and so on. (OECD 2020).

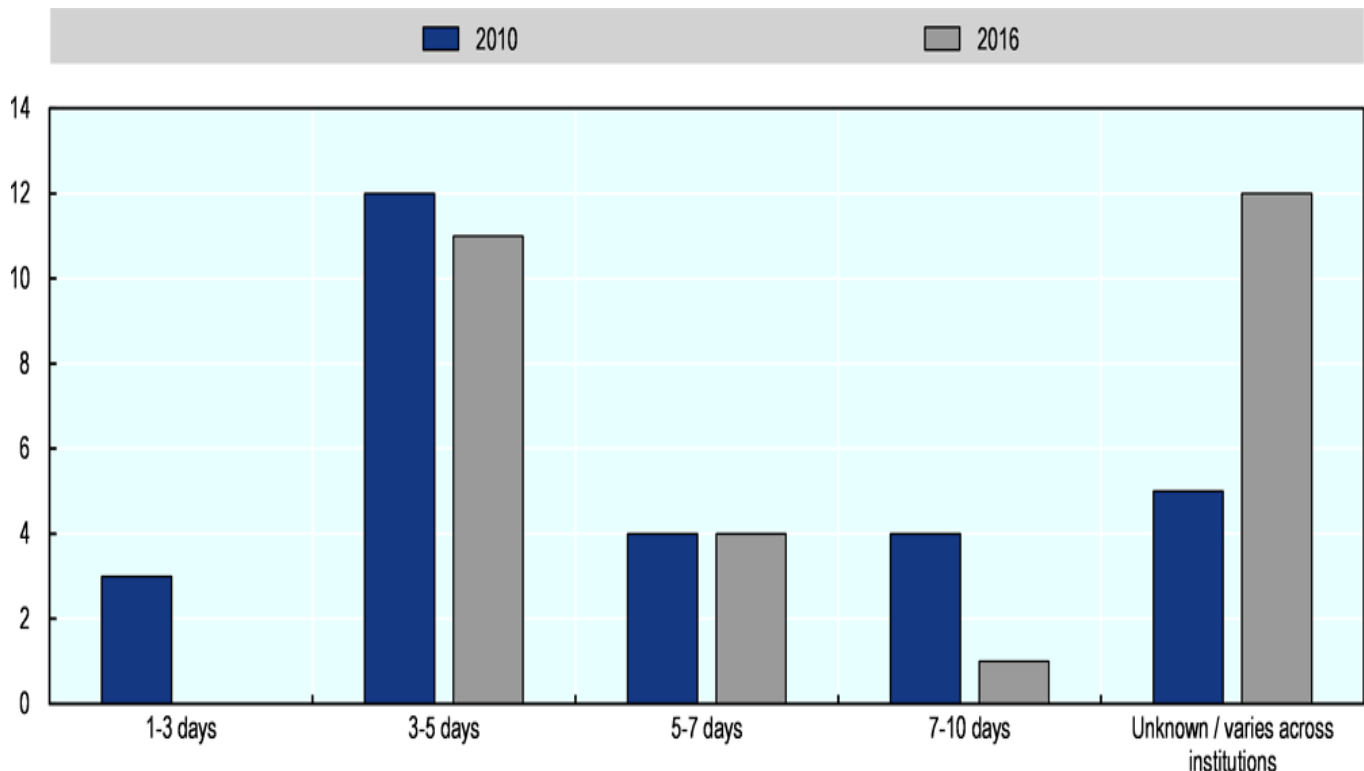


Figure 1. Average length of integrity training per year per employee. Source OECD 2020 as in OECD 2016: 12.

Areas of integrity training for public officials

This section will address some of the key areas of integrity training for public officials recognised in the literature and in practice.

Codes of ethics and codes of conduct

Codes of ethics and conduct are key documents for guiding the behaviour of public officials because they set the boundaries and expectations of behaviour (OECD 2019). In general, these codes outline the principles to evaluate public officials' behaviour as being right or wrong (Amundsen 2009: 6). Every code of ethics should typically include three elements: obligation for public officials to act responsibly; to avoid conflict of interest; and to do no (avoidable) harm (Whitton 2009: 2).

A frequent distinction is made between "aspirational" and "rule-based" codes of conduct. While the former are aimed towards setting broad ethical principles, the latter are legalistic, aiming to

specify prohibited behaviour as well as sanctions (Whitton 2009; Jenkins 2015). It is useful to take these differences into account when designing the appropriate integrity training.

Conflict of interest rules and procedures

Conflict of interest refers to a conflict between the public duty and private interest of a public official, when the public official has private interests that may influence the performance of their official duties in an impartial way (Amundsen 2009; Jenkins 2015; OECD 2019, 2020). The presence of a conflict of interest is not automatically illicit or unethical, but acting on it is (OECD 2019). In this context, integrity trainings can provide guidance on how to recognise conflict of interest when it arises, and how to appropriately address it.

Pre and post-employment rules

Pre and post-employment refers to the corrupt potential of the "revolving door". This term relates to the movement of individuals between positions

in public and private sectors, in either direction (David-Barrett 2011: 2). Governments typically regulate this practice in various ways (OECD 2019). It is an important area of training for public officials considering the frequency of movement between the public and private sectors and particularly because, in some countries, public officials tend to leave public office at a younger age than was the case in the past (David-Barrett 2011).

These movements carry a danger of conflict of interest. For example, public officials may favour a certain company in the process of awarding a public procurement contract in expectation of their future employment there (David-Barrett 2011).

Receipt of gifts

Receipt of gifts refers to procedures for managing and accepting gift offers in a public official capacity, considering that gifts may lead to a conflict of interest if they are attached to expectations of behaviour (Jenkins 2015; OECD 2019). According to UNCAC (UN 2004: 12), receiving gifts is among the key factors that may result in a conflict of interest. Consequently, integrity training typically covers the procedures related to this issue, which is normally outlined in the code of conduct.

Avoiding nepotism

Nepotism refers to a specific type of conflict of interest where family members of a public official enjoy an unfair advantage, for example, during the hiring process or employment (OECD 2019). Nepotism is one of the manifestations of favouritism, which may include other forms, such as cronysim (for example, awarding public procurement contracts to government friendly businesses) (see OECD 2014 for examples of good practice). Some scholars include clientelism here as well, which is a practice of exchanging targeted goods for electoral support, and typically involves the abuse of state resources for political gain (see Amundsen 2009; Grzymala-Buse 2008).

Nepotism practices negatively affect meritocratic principles of selection and limit competition (Amundsen 2009: 34).

Income and asset disclosure

Income and asset disclosures are often considered to be key mechanisms in preserving the integrity of public officials (Amundsen 2009: 35). Specifically, the obligation of public officials to declare their assets and income is one important aspect of preventing corrupt practices and conflicts of interest (Jenkins 2015). This includes the obligation for public officials to disclose financial interests, such as property, investments, shareholdings, directorships and the declaration of potential conflict of interest before it arises (Polaine 2018: 38).

Supporting an open organisational culture

An environment in which employees feel comfortable to report potential misconduct is important for strengthening the integrity of public officials. To achieve this, clear procedures and rules need to be in place. For example, whistleblowing policies that provide clear guidelines and procedures, such as protection against reprisals, are necessary (OECD 2019). Otherwise, if employees feel that they would not be adequately protected or that the system is inefficient in protecting those who report potential misconduct, they will not have incentives to come forward (Jenkins 2015: 13).

Transparency in lobbying

A level playing field in terms of access to the policy-making process, as well as transparency in lobbying needs to be ensured. Many countries do not have specific standards in place when it comes to the interaction between public officials and lobbyists. Those countries that do, typically include the obligation to: treat lobbyists equally; grant them equitable access; refuse meetings with unregistered lobbyists; report violations to authorities; register meetings with lobbyists (OECD 2021).

Ancillary activities

These [activities](#) refer to the incompatibility of offices. For example, the question of whether a public official can also be the head of a private company. Integrity training in this context can

address questions such as whether ancillary activities are allowed, when should they be prohibited, how to disclose them and when (Korupsioon.ee, no date).

Proactive disclosure / transparency measures / dealing with freedom of information requests

These refer to information on the organisational structure, salaries, job descriptions, budgets, public procurement processes, publication of contracts, access to information, public services information and others (Martini 2014). For example, integrity training can address the procedure for providing information on public interest based on a request from an interested party (Martini 2014: 3).

Integrity training for public officials: Design considerations

There are several important elements to be considered in the process of designing integrity training for public officials:

- Needs assessment: to make the training cost effective and targeted in light of limited resources, needs assessments can help to evaluate where the training is most urgently needed. Surveys on public officials' integrity levels in different sectors can be useful to assess the vulnerability of different parts of the public sector (see OECD 2013: 15). These surveys may help to identify which aspects of public integrity need further strengthening through training (see OECD 2013).
- Target group of participants/institutions: integrity training can be aimed at the sectoral level or at the general level of training public officials. One challenge here is that training may overburden employees, so a common practice is to provide induction training for new employees or training for senior staff who can then pass on the knowledge to their junior colleagues (OECD 2013; Luijken 2014).
- Timing and duration of integrity training: these can be organised once a person starts work in the public sector or as on-the-job training. In many countries, they are organised periodically (for example, code of conduct or ethics training every one or two years). The duration is dependent on available resources and means of delivery. Naturally, online training can last longer and engage more participants (Luijken 2014).
- Training methods, techniques and means of delivery: an OECD (2013: 19) report identified four typical methods of integrity training: conferences and lectures; seminars and workshops; interactive methods; and case studies and internet based training. In online learning platforms, for example, training material, which may involve textual information, videos and exercises, are in a virtual space (for example, e-learning platforms) (Luijken 2014). In many cases, countries opt for a combination of multiple methods. Tests are typically administered at the end of the training to assess the knowledge that participants obtained during the training. Existing evaluations of integrity and anti-corruption training provide some evidence that the "combination of participatory and interactive training components can greatly increase the degree to which participants engage with the training material" (Luijken 2014: 6).
- Content of integrity trainings: the previous section outlined the key areas that can be addressed in integrity training for public officials. Broadly speaking, when it comes to the training content, it can incorporate the legislative framework and values, and thus, be both legalistic and value oriented. For example, an OECD (2013) study on ethics training for public officials has identified the following laws and regulations present in integrity training:
 - civil service legislation
 - conflict of interest law
 - anti-corruption legislation
 - administrative code
 - public procurement law
 - law on access to information

○ criminal code
When it comes to values in the integrity training, they identified (OECD 2013: 22):

- impartiality
- transparency
- responsibility
- legality
- integrity
- efficiency
- equality
- justice

Integrity training for public officials: Examples of existing practice

This section outlines examples of integrity training for public officials in several countries, focusing on their content, target groups, timing and duration, and methods, techniques and modes of delivery.

Austria

The Federal Bureau of Anti-Corruption (BAK) develops and holds integrity training and lectures for different target groups, including training for civil servants in the whole of public administration (BAK, no date). For example, training entitled Preventing and Combating Corruption was organised for civil servants at the Federal Ministry of Interior and then expanded to include broader target groups (BAK, no date, 2017, 2020).

In general, this training is tailored more towards anti-corruption issues, but they contain some specific aspects related to integrity training:

- theoretical background on corruption
- discussion of existing corruption indices and statistics
- professional ethics, communication and conflict management
- legal and theoretical background on the investigation of corruption, grounded in the Austrian legislative framework (BAK, no date)

BAK tends to focus more on lectures. In 2020, it organised a number of lectures primarily targeted

at the Federal Police Academy (SIAK) and for civil servants in public administration. Topics included:

- economic crime
- disciplinary and civil service law
- procurement
- data protection
- ethics
- compliance
- human rights

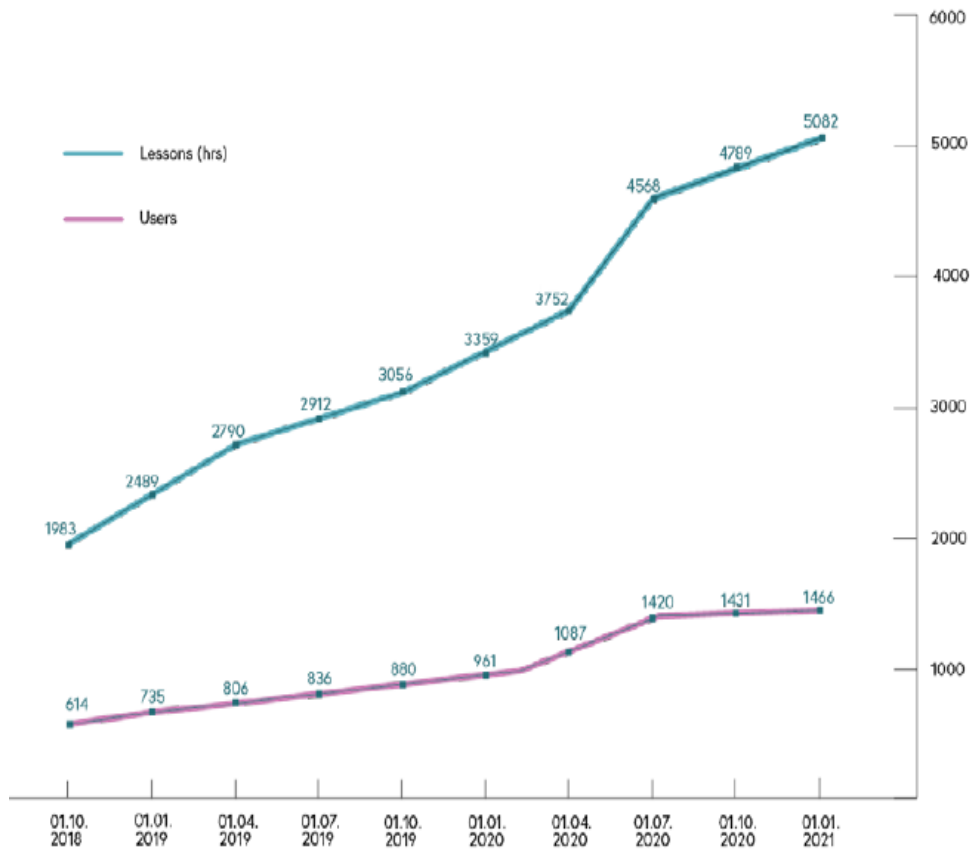
Moreover, BAK has also developed several e-learning modules, such as:

- Corruption prevention within the project Security Partnership – Joining Forces for Security in Austria. It is targeted to security officers to train them to correctly act in compliance specific matters. In terms of content, the module begins with a film on the phenomenon of corruption. The submodule entitled Practice-Oriented Case Examples of Maintaining Contact between Security Officers and Security Partners offers case studies related to compliance (BAK 2020: 33):
 - general obligations of conduct
 - lawful performance of duties
 - partiality
- The criminal law on corruption was organised as part of awareness raising measures for the Austrian Federal Office for Immigration and Asylum (BFA). The course provides case studies on the criminal law on corruption. The topics include:
 - bribery in asylum procedures
 - accepting advantages when in contact with interpreters
 - disclosure of personal data in asylum processes (BAK 2020: 33)
- An e-learning module on the code of conduct for the Austrian Federal Ministry of Interior (MOI), Our Values. Our Approach, is a valuable example as it provides content directly related to integrity issues. The course combines theory and case studies. It module includes, among others:
 - content about the rule of law
 - acceptance of gifts
 - obligations with regards to conduct
 - secondary employment

- principles of dealing with each other (BAK 2020: 34)
- The e-learning module Code of Conduct of the Civil Service: The RESPONSibility Rests with Me – a Question of Ethics, is an online training course which raises awareness among employees to the consequences of violating the rules of conduct and possible sanctions under civil service and criminal law (BAK 2020: 35).
- Worth mentioning at this point is a value based game entitled fit4compliance and covers critical discussions of personal values and moral attitudes. Participants are faced with various dilemmas that they are asked to solve. Although originally

designed for the youth, it turned out to be interesting for adults. The BAK (2017: 31) report noted that the game developer had prepared the game for the BAK as well. Also, BAK worked on a version of the game for police training.

BAK (2017, 2020) reports positive effects from these training programmes, emphasising the increase in the number of civil servants who went through these various integrity training courses (see Figure 3). Specifically, when it comes to the training displayed in Figure 2, BAK (2020: 34) points out that a combination of theory and practical case examples helps employees to quickly refresh their knowledge of the code of conduct.



Code of Conduct, Mol – e-learning; statistics (from 1 October 2018 to 31 December 2020)

Figure 2. The rise in the number of users/lessons of the e-learning training entitled Code of Conduct of the Austrian Federal Ministry of Interior (MOI) – Our Values. Our Approach. Source: BAK 2020: 34.

Estonia

There is an e-course on the [prevention of corruption and conflict of interest in the public sector](#) in Estonia. Online training can be useful given its cost effectiveness and flexibility, although ensuring consistent participation can be an issue as users may tend to start but not complete the course. The course is prepared by the Estonian Ministry of Justice, and it offers basic knowledge on corruption prevention and conflict of interest in the context of Estonia (Korruptsioon.ee, no date).

The course is composed of eight Moodle¹ modules and short YouTube videos (for example, a short video on [gifts and benefits](#)). There is a test after each module to assess participants' knowledge. The course is flexible in the sense that organisations can import the course into their own e-learning environments and adapt it to their needs, suggesting the flexibility and cost effectiveness of this mode of training (Korruptsioon.ee, no date).

The e-learning course covers the following topics:

- [introduction](#)
- [definition of an official](#)
- [obligation of an official](#)
- [gifts and benefits](#)
- [procedural restrictions and related person](#)
- [exceptions to procedural restrictions](#)
- [ancillary activities](#)
- [lobbying and influencing](#)

Poland

Following the need for anti-fraud training in Poland, an [e-learning platform](#) offering anti-corruption trainings for different target groups, including public officials, was developed. The e-learning platform of the Central Anti-Corruption Bureau (CBA) was launched in 2014. Its target groups of awareness raising trainings included public officials, clerks, public administration and businesses.

The course is based on real-life case studies, and participants learn about possible behaviours to adopt when dealing with corruption. There are three training sessions on the e-learning platform:

- corruption in public administration
- corruption in business
- counteracting corruption

Every module is composed of 9-10 lessons, which incorporate:

- static text and dialogue
- animated scenes
- audio and video material
- content provoking discussions and interaction

As with the Estonian example, each module ends with a test for participants.

After three years of implementation, CBA modified the course by shortening the content of the training following feedback from participants. It also made it more visual and interactive than it had been (EC, no date). This can be valuable guidance for other countries implementing integrity training; namely, collecting feedback from participants can help in designing more effective courses.

Another important aspect of the Polish experience is their effort to assess the factors of success and existing challenges, considering that there is not much written on the evaluation of different types of integrity training. They emphasise the following factors of success of their e-learning platform (EC, no date):

- free of charge access to e-learning
- short and thematic modules
- targeted content, relevant for public servants and focused on the Polish and international legislative and regulatory context
- improvements in accessibility, use of interactive tools (animation, tests)
- an option to receive a certificate of completion
- capacity and expert knowledge (for example, they particularly emphasise their access to historical data, database on fraud cases and good practices, which enabled them to design content tailored to participants)

They also emphasise key lessons learned, which can serve as a useful guidance to countries in the

¹ An open-source learning management system.

process of designing their integrity training (EC no date):

- The first version was too time consuming for users; it was too focused on numbers and data and the content was too dense.
- Handling of personal data was too time consuming for CBA, so they stopped doing it in future versions of the e-learning platform.
- The key to success was the knowledge of the team who implemented the course. CBA particularly emphasises the engagement of different experts in this process, including: trainers in anti-corruption, investigators, compliance officers, IT experts and psychologists to adequately tailor the content to the relevant target groups.

Slovak Republic

There is an [anti-corruption e-learning training programme](#) entitled Integrity Against Corruption in the Slovak Republic. It was designed by the National Crime Agency of the Police Force Presidium.

Its content relies on different sources of information, such as:

- national anti-corruption documents
- international anti-corruption initiatives
- other legal instruments, manuals and recommendations produced by the OECD

There are three main modules in the course (MINV, no date):

- public integrity:
 - introduction to public integrity
 - setting high standards of conduct for public officials
 - managing conflict of interest
 - managing pre and post-public employment
 - setting standards for the receipt of gifts
 - avoiding nepotism
 - supporting an open organisation culture within the public sector
 - ensuring transparency in lobbying
 - e-learning test

- elimination of potential for corruption
- raising awareness to bribery in international business transactions

The content is based on textual information (practical application of legal instruments, internal regulations, anti-corruption prevention programmes). The training modules also contain a questionnaire.

Other relevant examples

OECD (2005) has developed a toolkit specifically targeted at recognising conflicts of interest. It includes a set of practical solutions for implementing and developing ways to manage conflicts of interest. It is composed of numerous scenario-based case studies covering:

- conflict of interest
- receipt of gifts
- asset and interest disclosure
- whistleblower protection policies

In Canada, the Treasury Board Secretariat collaborates with the Canada School of Public Service to deliver integrity training targeted at public officials (Polaine 2018). For example, there is a training course entitled Values and Ethics Foundations for Employees, which is a 1.5 hour online training course aimed to be a part of the introduction to public service. The session includes informative exercises and scenarios, with topics such as (Government of Canada, no date):

- understanding the values and ethics code for the public sector
- identifying and applying the values
- recognising conflict of interest, ethical dilemmas and accountability issues

Recent national anti-corruption strategies from the UK, South Africa and Namibia recognise the importance of integrity training. For example, in the UK's (2017: 56) national strategy, there was a commitment to implement training for UK embassy staff on the awareness and understanding of corruption, consisting of guidance on how to report offences and how to promote standards of trade integrity.

Further, the national anti-corruption strategy of South Africa emphasises the importance of

training, but it does not go into detail on the setup and content. Rather, it makes some general suggestions on where the training might be organised. For example, it proposes that, to create a culture of whistleblowing, training should be organised for human resources officials on how to support whistleblowers. Moreover, the strategy proposes efforts to increase the integrity of professions that are central to anti-corruption efforts by organising training and developing ethics curricula (Republic of South Africa 2020: 78).

The National Anti-Corruption Strategy of Namibia also stresses the importance of integrity training. Specifically, they point out the need for organising corruption awareness and ethics training for the staff of public enterprises, public servants and school teachers (Anti-Corruption Commission Directorate of Public Education and Corruption Prevention of Namibia 2021).

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