REGIONAL TRAINING MANUAL: WATER INTEGRITY FOR THE MIDDLE EAST AND NORTH AFRICA
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About the authors

The authors for this manual, Ellen Goldberg, Emmanuelle Kunigk and Joy Saunders have considerable experience of living and working with integrity in the MENA region and drafting practical teaching resources to assist individuals to act with and demand integrity.

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Joy Saunders is the Chief Executive Officer of Integrity Action. Joy is a qualified ACA accountant with experience improving the governance frameworks of complex organisations primarily in the financial services and charity sectors. For her transformational involvement in Integrity Action, Joy won the 2013 Director of the Year for Public and Third sector in London and South East from the United Kingdom’s Institute of Directors. Joy has taught in various international fora on the importance of metrics, closing the feedback loop and measuring impact in the anti-corruption field. She also sits as the civil society representative for the OECD Anti-Corruption Task Team.

How to Cite:
Foreword

Most countries in the Middle East and North Africa (MENA) are chronically water stressed with population growth and the impact of climate change exacerbating the stress. However, the water scarcity in the MENA region is not only a result of physical water shortage, but is also linked to lack of good governance structures, high water demand, and low levels of trust between different parties sharing the same water resource. Although most of these countries have developed comprehensive water laws and policies, many face significant challenges in implementing them. Poor resource management, insufficient capacity, lack of institutional integrity, bureaucratic inertia and a shortage of new investments further undermines effective governance of water in the region1.

Many of these countries have farmer communities that are dependent upon sustainable access to surface and groundwater resources to sustain their livelihoods, but are finding themselves marginalised as water rights and allocation decisions become increasingly centralised through governmental structures2. The political instability is in many places also leading to displacement of people increasing their vulnerability as well as the pressure on the resources. Looking beyond water resources management while recognising the difficulty in making generalisations and the wide variations across the region, MENA countries consistently perform below average in international ratings on indicators of transparency, voice and accountability, as well as control of corruption3.

Water integrity is based on a set of interlinked, practical principles and tools for daily and diverse implementation in water management practices. Key elements of water integrity are transparency, accountability, and participation based on core values of honesty, equity and professionalism. Increased water integrity will evidently lead to competent institutions without corruption. Therefore, we believe that water integrity is one of the most important means to achieve a water-wise world and one that is resistant to corruption.

This training manual was produced as part of the Capacity Building Programme on Water Integrity for the Middle East and North Africa region implemented by the UNDP Water Governance Facility at SIWI with partners as further described below. Implemented by the UNDP Water Governance Facility at SIWI. The aim of the programme is to strengthen water governance capacities, particularly on water integrity, throughout the region. While recognising the differences between the Maghreb and the Mashreq regions, and between the countries in these regions, we chose to focus on the region as a whole as we believe the knowledge exchange on the regional level will be an added value in promoting water integrity.

A lot of the content of this manual builds on material previously developed by Integrity Action, and it also draws on the Training Manual on Water Integrity developed by SIWI and partners in 2011. A draft version of the manual was tested and validated during a Training of Trainers on Water Integrity which took place in Tunisia in December 2014. This training manual is available freely for use, adaptation and translation as desired. Please give appropriate acknowledgement to the source when using this manual.

We hope the use of this training manual, in combination with the Training Manual on Water Integrity (SIWI, 2011), will raise the awareness of policy-makers and increase the capacity among practitioners to promote and apply water integrity principles for sustainable water resources management in the MENA region.

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1 Jacobson, M., Jaraiseh, A., (eds.,) Regional Synthesis Report: Water Integrity in the Middle East and North Africa. SIWI, Stockholm
The UNDP Water Governance Facility at SIWI (WGF) is implementing a Regional Capacity Building Programme on Water Integrity for the Middle East and North Africa region from 2014 to 2017 in collaboration with Global Water Partnership - Mediterranean, Integrity Action, International Union for Conservation of Nature – Regional Office of Western Asia, and with the generous financial support of the Swedish International Development Cooperation Agency, Sida. The Arab Integrated Water Resources Management Network, AWARENET is a supporting partner to this programme. In December 2014, the programme was politically labelled by the member countries of the Union for the Mediterranean (UfM).

The programme is implemented in Jordan, Palestine, Lebanon, Morocco and Tunisia in cooperation with the following national partners in each country:

- Jordan: Jordan University of Science and Technology
- Lebanon: Issam Fares Institute for Public Policy and International Affairs at the American University of Beirut
- Morocco: Al-Akhawayn University in Ifrane
- Palestine: Al-Quds University
- Tunisia: Water Research and Technologies Center

The overall objective of the programme is to develop capacities of different water stakeholder groups at different governance levels in the MENA region to improve transparency and accountability practices in water resources management in their respective countries. It has four specific target groups for which specific objectives has been developed to achieve the overall objective:

**High-level decision-makers**
To raise awareness and foster high-level political dialogue on water integrity among high-level officials.

**National policy-makers and managers**
To increase the knowledge about tools to combat illicit practices such as patronage/nepotism/cronyism and to improve the information flow and communication channels between senior managers at different governance levels to strengthen integrity, accountability and transparency.

**Mid-level managers**
To raise the capacity among mid-level managers, operational staff, and other public workers to ensure integrity in their daily work within their organisations and prevent risks for corruption from arising, by promoting good practice and implementing integrity and compliance mechanisms.

**Civil society**
To improve the capacity of local leaders and civil society actors to demand accountability in the management of water resources and services.

In these very broad target groups special efforts are made to reach out to young professionals and women.
It is commonly acknowledged that context matters. When designing successful public policies, programmes or particular initiatives for water integrity, it is therefore important to take specifics into account. The primary objective of this manual is to support the trainers of the Water Integrity Capacity Building Programme in MENA to deliver the national training workshops of the programme. The manual also provides the trainers with useful links and materials to support them in their role as Water Integrity Trainers. The manual has two functions:

1. Provide theoretical and practical teaching content related to the MENA context, especially in relation to water governance, integrity and anti-corruption. Even though each country in the region has its own challenges, it is possible and useful to identify some commonalities across the region.

2. Provide practical teaching methodologies to support water integrity training.

The manual is divided into three sections.

- The first section gives a general overview of governance and corruption challenges in the region.
- The second section provides helpful integrity related content for training on water integrity.
- Finally, the third section provides suggested learning templates, teaching methods and facilitation guides to help trainers in the MENA region teach on water integrity.

Additional materials can be found on the following websites:

- **UNDP Water Governance Facility at SIWI**
  www.watergovernance.org
- **Integrity Action**
  www.integrityaction.org
- **The Global Water Partnership (GWP)**
  www.gwp.org
- **The Mediterranean Region of GWP**
  www.gwp.org/en/GWP-Mediterranean
- **International Union for Conservation of Nature**
  www.iucn.org
General overview of governance and integrity related challenges in the region

**Purpose:** To assist with considering why it is important to promote water integrity in the region.

**Content:** The MENA region has limited empirical data on corruption. However, it is generally agreed that corruption is widespread and deeply rooted in the political infrastructure of the state (mainly monarchies or authoritarian regimes), the institutional infrastructure of the public sector (very large, overstaffed and with low wages), and the limited opportunities for participation. As a result, most countries in the region perform especially poorly on indicators of transparency, voice and accountability. Development efforts in the region have mainly focussed on enhancing democratic processes and public participation through broader governance initiatives.  

**Underlying causes of governance and anti-corruption**

A variety of factors have been highlighted to explain the “governance gap” and relatively poor governance and anti-corruption performance of MENA countries. These factors are fully developed and documented in the 2003 World Bank report on Better Governance as well as in “Institutionalised Corruption: an instrument of governance in the Middle East and North Africa?”

**Lack of transparency and access to information**

MENA countries are characterised by a general lack of transparency and limited availability of information, even within government institutions (including ministries) themselves. Information can be controlled or censored by government. Some countries like Jordan, Tunisia and Yemen are moving towards greater transparency through freedom of information laws, but most governments in the region restrict access to information, control the media or make no effort to publish it widely. The lack of information about procedures, poor publicly available information and limited recourse mechanisms limit the opportunities to contest dishonest behaviour within a country.

**Poor external accountability mechanisms**

In MENA countries, civil society organisations, the media and professional associations usually exist but their legitimacy and effectiveness are hampered by government controls and restrictions.

**Elitist social structures and pervasive corporatism**

In the region, ruling groups are favoured over the rest of the population and informal patronage infiltrates government structures. The minority elite usually control most of the economic resources as well. Reformist governments may hesitate upsetting their biggest allies by regulating economic activities, leading to widespread corporate misconduct and corruption. The powerful social and cultural norms based on the family nucleus in most Arab societies reinforce this trend and the spread of socially accepted forms of nepotism.

**Excessive regulations and barriers to entry**

The region is also characterised by excessive regulations and tight control of market participation, creating dependency on government for basic services. In many countries, the private sector is also largely dependent on public contracts or cooperation to sustain its activities.

**Impact of corruption**

The impact of corruption on social, human and economic development has been widely documented. Research compiled in the framework of a UNDP programme on governance in Arab countries indicates that the corruption factor is correlated to most development and governance indicators such as economic growth rate, Poverty Index, GDP per Capita, Human Development Index, Foreign Direct Investments or spending on education and health. (Please see "Integrity, Corruption and Development in Arab Countries ".)

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Findings from another study also confirm that control of corruption is a major determinant affecting per capita income. Please see “Corruption in the Middle East: Challenges Posed for the United States”.

High levels of corruption have an impact on slow human development just as levels of human development also affect levels of corruption. The impact of corruption on human development in the region has also been analysed by the Lebanese Transparency Association and the Fares Foundation in a paper published in 2006. This study highlights the effects of corruption on political legitimacy and processes in the Arab world. Please see “The Impact of Corruption on Human Development in the Arab world”.

The challenges of attempting to measure corruption

The last decades have witnessed a rapid expansion of indicators that measure corruption. The most popular ones are Control of Corruption (COC) Index, Corruption Perception Index (CPI) – refer to Box 1; ICRG Risk Scores; Bribe Payers Index; ECA’s African Governance Indicators, Business Environment and Enterprise Performance Survey (BEEPS) and International Crime and Victim Survey (ICVS) and Ibrahim Index of African Governance (IIAG) and Gallup International Voice of the People (GIVP).

The literature has made many attempts to measure corruption differently, but for the most part, all methodologies rely on perception assessments, primarily through expert, firms and household opinion surveys, and each have their own weaknesses. It is evident that perception is highly subjective. For instance, a person belonging to the opposition party of a country may perceive the government in power to be corrupt whereas another person belonging to the ruling party may perceive the government to be less corrupt. Furthermore, the above-mentioned corruption measurements do not take into account the different socio-cultural (including ethnicity) and geopolitical landscapes (including rural vs. urban) of the surveyed countries. In addition, most of the corruption measurements tend to be generic in that they lack sector specificity and are also vague on the dimensions of corruption being assessed. It may thus be inappropriate for any measurement of corruption to rank countries on the basis of perceptions by a narrow group of persons and unrepresentative sample in any given country.

Box 1: The Corruption Perception Index (CPI)

The CPI was first published in 1995 and can be attributed to initiating a serious reflection worldwide on the impact of corruption on economies. Indeed, as from the mid-1990s, the CPI results have been associated with: (a) influencing countries’ political trajectories (e.g. In 1996, Benazir Bhutto of Pakistan was confronted with the country’s poor CPI rankings in Parliament, which resulted in her dismissal from office); (b) triggering outcry over the results & rankings (e.g. in 1998, the Government of Cameroon issued a statement lambasting the CPI) and/or (c) increasing awareness on the seriousness of corruption (e.g. in 1999, the Nigerian government issued a statement indicating that it had no problems with the CPI results since it demonstrated the problems that the government was trying to address).

Since the publication of the CPI, researchers ranging notably in the fields of development economics, statistics, econometrics, public policy and social development have highlighted the strengths & weaknesses of this Index. One unique characteristic of the CPI as a measurement of corruption remains the extensive number of surveys used: the minimum number of surveys used for each country is three, while some countries are evaluated with the use of as many as 14 to 15 surveys. This notwithstanding, one of the critical limitations is that the exact set of sources used for a country’s evaluation and the wording of the questions put to experts vary from year to year: this clearly makes a yearly net change in perception difficult to measure and significantly reduces the credibility of the results.

Although the CPI does continue to remain the most-quoted index by donors, research institutes, governments, business executives, civil society & academics worldwide, it does not deter from the fact that there is need to explore an alternative approach to measuring corruption, which focuses notably on context-specific dimensions of corruption.
### Extent of Corruption in MENA countries

Research is limited on the exact extent and nature of corruption in the MENA region. Experts agree that the region is characterised by the paucity of accessible empirical data on corruption related issues, possibly due to a general lack of will for such scrutiny. Below is an overview of some key sources of information on governance in MENA.

Transparency International’s CPI consistently ranks MENA countries below the world median, with some variations across countries, Jordan, Morocco and Tunisia performing better than their peer countries but Libya and Iraq, remaining at the bottom of the ranking (2014 results). Three out of the bottom 10 countries on Transparency International’s 2014 Corruption Perceptions Index are from the MENA region. Two of these three (Iraq and Libya) are in the midst of gruesome civil wars where people are fleeing their homes to take refuge in other places. The CPI points to political corruption as the main challenge in the region. Ruling elites have concentrated power with small groups blurring the distinction of separation of powers, which spill into decision-making processes that affect millions of citizens. Please see: http://blog.transparency.org/2014/12/03/middle-east-and-north-africa-a-region-in-turmoil

The Arab Human Development Report (AHDR) - latest version 2009 describes the effects of corruption. In 2005 “Freedom Surveys” were carried out in five Arab countries (Jordan, Morocco, Palestine, Algeria and Lebanon). In 2004 90% of the respondents believed that corruption pervaded their society, while 70 % of the respondents of another international survey believed that their country is “run for the benefit of the influential few”. The majority of respondents in all surveyed countries were aware of bribes paid or favours rendered during the year preceding the survey either to access services they were entitled to or to avoid punishment by the authorities. Please see: www.arab-hdr.org/contents

The World Bank’s Governance Indicators for the region provided a more nuanced picture of the situation back in 2003 and analysed the results in a report on “Better Governance for development in the Middle East and North Africa Report”. Although it is difficult to make generalisations and there are wide variations across countries, as well as significant changes since 2003, MENA countries consistently exhibit systematic weaknesses in terms of accountability and access to civil and political rights. Furthermore, although quality of governance tends to increase with incomes as consistent with international trends, MENA countries consistently display lower quality of governance than would be expected for their level of income. This gap is even wider for public accountability related indicators. This “governance gap” has been extensively documented by the above mentioned World Bank report.

### Specifics for water

Research and case studies increasingly show how corrupt practices are detrimental to human development and in particular to sustainable water resource management, use and service provision. Corruption ultimately limits the availability and accessibility of resources necessary for improving livelihoods, health and economic opportunity, as it diminishes a country’s prospects for providing water and sanitation for all and implementing sound water resources management policies and plans. It also erodes trust in water institutions, governments and in society at large. In doing so, it further fuels social and economic inequalities since poor people are denied a vital resource for improving livelihood opportunities as well as access to basic services. This also links to the equity aspects in distribution of water rights and non-discrimination of water resources management and allocation. Water insecurity leaves poor people living in informal urban settlements the most vulnerable alongside those in rural areas whose livelihoods depend on rain-fed agriculture or the availability of grasslands and water for grazing animals.

The Global Corruption Report 2008 by Transparency International points out that the water sector is at high risk for corruption since:

1. Water is multifunctional in society and cuts across many institutions leading to coordination challenges and exploitation of legal loopholes;
2. Water management is largely viewed as a technical area with limited considerations for social and political dimensions, including corruption and its social and economic cost;

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9 Read more at www.transparency.org/cpi2014
UNDP, Regional Bureau for Arab States
3. Water infrastructure development involves large flows of public and private financial resources and projects tend to be complex and opaque, making procurement lucrative and manipulation difficult to detect; and
4. Water is scarce, and becoming more so, leads to higher corruption risks emerging from the control of water resources and their distribution.

As subsequently elaborated in its subsequent 2011 Global Corruption Report, the situation can be amplified in face of climate change by increasing water scarcity and the risk of water-related disasters; indeed climate change adaptation and mitigation policies are fundamentally tied to water and can translate into large-scale water infrastructure investments which must also be pursued within a transparent and accountable framework that increases opportunities for public participation and reduces the risk of corruption.

Ultimately, institutional frameworks are necessary to improve water governance at all levels of government, be it at the regional level, basin level, country level or local level. Public accountability and transparency must be enforced as corruption in the management of water resources can take place at every level and ranges from improper decision-making processes or incompetence based on power politics to petty and grand scale corruption that drains national budgets. It can also take place between many different types of actors, such as public agencies, private companies and water users. Despite efforts to improve water governance, also aid resources provided by multi- and bilateral agencies have not been immune to corruption and misuse. The regulatory and oversight institutions intended to provide checks and balances within the system, if they exist, are also generally under-resourced and lack independence.16

Most countries in the region are already chronically water stressed with population growth and climate change impacts exacerbating the stress. However, it is generally agreed that the water scarcity is not only a result of physical water shortage, but is also linked to lack of good governance structures, high water demand, low levels of trust between different parties sharing the same water resource, and limited institutional mechanisms for applying integrated water resources management principles.16

Governments, bilateral and multilateral organisations have sought to incorporate anti-corruption policies and programmes into their development assistance programs, but with marginal success. In water resource management and services, it is only in recent years that integrity, honesty, transparency and anti-corruption measures has appeared on water reform agendas. However, with the changing tides sweeping the region, this is changing and increased transparency, accountability and anti-corruption measures are now considered to be of central importance for achieving equitable and sustainable development.

The recent and on-going events mobilising civil society activism have also exposed public frustration with the lack of transparency and accountability of decision-makers to public opinion. Participatory processes, however, must be informed and empowered with access to information in order to allow for civil society to contribute constructively to policy debates and hold public officials accountable. Despite some preliminary progress in this area, existing legal provisions on public access to information remain stymied by restrictions and loopholes that prevent transparency and the right of communities to know about issues that affect their daily lives. As of September 2012, in the MENA region only Jordan, Tunisia and Yemen had access to information laws in place, although many others have drafts.17 National integrity systems in the MENA region are generally very weak with a lack of checks and balances on executive power making horizontal and vertical accountability mechanisms ineffective.18

**Different approaches to tackling corruption in MENA region**

Addressing the root causes of corruption in the region poses considerable challenges as it entails a radical reform of the political structures in place, deep economic reforms as well as the introduction of laws and mechanisms of accountability and transparent governance. In addition, fighting corruption or even using the word “corruption” in the region is likely to meet resistance from society as a whole and not just the local privileged elites who benefit from a corrupt system.

The political dimension of anti-corruption reforms is seen as a major challenge and a potential obstacle in the region. The successful introduction of anti-corruption reforms requires genuine political will as well as public support for reforms. Interventions need to be at various different levels to combat the multi-faceted nature of corruption in the region.

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17 For more background on FOI laws in the Arab world, please see: Almadhoun, S. 2010. “Status of Freedom of Information Legislation in the Arab World”
Session 1:
Corruption and anti-corruption concepts and frameworks

Learning objectives
By the end of this session, learners will:
• Be familiar with the functions of corruption, the externalities of corruption
• Be familiar with the development of anti-corruption and integrity activities over time
• Understand the spoilers of reforms, and why reforms fail

Supporting materials
See Presentation
Session 1_Corruption and Anti-Corruption Concepts and Frameworks

See Document

Or See Online Link
http://www.watergovernance.org/sa/node.asp?node=1555

Corruption
Corruption is a meme, and there are various reasons why individuals or institutions engage with corrupt practices. From the perspective of:

The powerful:
• Proposition 1. In a low-governance setting, corruption is the fastest path to wealth and/or power.
• Proposition 2. In a low-governance setting, corruption is the best way to retain wealth/power.
• Proposition 3. Corruption can foster social stability and entrench the status quo.
• Proposition 4. Corruption enables the powerful to set the rules of the game.

The weak:
• Proposition 5. Corruption is a means of engaging with a more powerful adversary.
• Proposition 6. Corruption can give a weaker competitor an advantage.
• Proposition 7. Corruption can be a path to social and economic mobility, especially in highly stratified societies.
• Proposition 8. Corruption can be a means of public resource redistribution.

Justice:
• Proposition 9. Corruption can protect against unjust laws or regulations
• Proposition 10. Corruption makes legal impunity possible.

Business:
• Proposition 11. Corruption makes it easier to win a contract.
• Proposition 12. Corruption creates unfair competitive advantages.
• Proposition 13. Corruption protects incumbents, established and domestic players against newcomers.
• Proposition 14. Corruption makes it possible to jump the queue.
• Proposition 15. Alleged corruption by a competitor is a convenient excuse, for example for losing a contract.

Government:
• Proposition 16. Corruption makes it easy for governments to pay low wages and not to collect (sufficient) taxes

An insider:
• Proposition 17. Corruption has a powerful group-binding function
• Proposition 18. Corruption prevents defection.

An outsider:
• Proposition 19. Corruption is a way to gain access.
• Proposition 20. Corruption buys rapid shifts in allegiances.
• Proposition 21. Corruption reduces the costs of learning about a new context by using the “universal currency” of greed.
**Why do reforms fail?**
- Corruption is a very successful meme.
- Reforms over-simplify functions and externalities.
- The principal-agent problem.
- Size and timing matter.
- Reforms ignore spoilers.

Spoilers are “opponents” who actively harm or hinder the integrity work and other constructive governance reforms. This is sometimes because they have a personal stake in the status quo and sometimes because they were not properly consulted or given their due consideration in the process of change. Context analysis and sensitivity are critical to understanding spoilers and constructive engagement is key to counteracting them.

**What choices do you have when faced with a major ethical dilemma?**

Exit, Voice and Loyalty (Albert Hermann) …. and organise! (Integrity Action).

**The rise of the transparency and accountability movement**

Corruption is commonly defined as the abuse of entrusted power for private gain. It hurts everyone who depends on the integrity of people in a position of authority.

In the early 1990s, corruption was a taboo topic. There was no global convention aimed at curbing corruption, and no way to measure corruption at the global scale. 1994 saw the once taboo topic of corruption emerging on the world agenda with, for example, members of the Organisation for Economic Co-operation and Development (OECD) adopting a recommendation to criminalise foreign bribery. In 1995 the first CPI was launched, ranking 45 countries on their perceived level of public sector corruption.

By 1996 the World Bank picked up on the theme of corruption, called it “the cancer of corruption” and made anti-corruption performance a condition of assistance. In 1997 bribery finally became an international crime with OECD members adopting the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and in 1999 it came into force. In 2000 banks were urged to better ‘know their customers’ (also known as KYCs) and consequently, the Wolfsberg Principles on Money Laundering and Corruption were adopted by major private banks. In 2002 the Council of Europe’s Criminal Law Convention on Corruption came into force and in 2003 the United Nations Convention against Corruption (UNCAC) was adopted. Signed by 140 countries, UNCAC was a landmark global agreement providing a comprehensive blueprint for reform and new mechanisms to combat corruption. The UNCAC entered into force in 2005. Since the financial crisis there has been a shift in focus and much greater emphasis was placed on making integrity and accountability cornerstones of business, government and society. The development of the anti-corruption movement can thus be broken down into four phases.

Four phases in the anti-corruption movement
- **Phase 1** (1986-1995): Breaking the taboo – the case for reform
- **Phase 2** (1996-2003): Setting international standards
- **Phase 3** (1996-to date): Enforcement and implementation
- **Phase 4** (2011-to date): Pro-integrity and citizen led

The key milestones of the anti-corruption movement are listed in more detail in Appendix 1.

**Learning methods**

Group work or Plenary Discussion: Discuss spoilers in the water sector and how to help reforms succeed.

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20 The text of the United Nations Convention against Corruption can be retrieved here: www.unodc.org/unodc/en/treaties/CAC
Session 2:
What is integrity?

Learning objectives
By the end of this session, learners will:
• Understand the basic concepts of integrity – Accountability, Competence, Ethics, Corruption controls
• Understand the linkages to the Human Rights Based Approach to Water
• Be familiar with the National Integrity System and its components
• Know how to apply an ‘Integrity Lens’ – analysing a situation, a process, an organisation, using the elements of integrity
• Know how to apply a ‘Stakeholder Analysis’

Supporting materials
See Presentation
Session 2_Introduction to Integrity

See Document
Session 2_Characteristics of Integrity for Group Work
Appendix 2 Case Studies on Water Integrity

Defining integrity
Integrity Action’s definition of integrity is:
Integrity is the alignment of Accountability, Competence and Ethics, without corruption/with corruption controls

When applied to water and the integrity in water resources management, SIWI defines water integrity (which reinforces Integrity Action’s definition of integrity) as “the adherence of water stakeholders and institutions to governance principles of transparency, accountability, and participation, based on core values of honesty, equity and professionalism. Ultimately, water integrity is one of the most important means to achieve a water wise world, one that is resistant to corruption.”

The formula is:

\[ \text{Integrity} = a \times (\text{Accountability} + \text{Competence} + \text{Ethics}) - c \times \text{Corruption} \]

Accountability
Enabling stakeholders to check that what is done is the same as what is said being done

Ethics
Doing it with honesty and public purpose

Without corruption
Doing it without corruption, and with corruption control mechanisms

In using the integrity formula, it is important not to forget the concept of alignment. Alignment means that Accountability, Competence and Ethics must all be ‘working’ towards achieving the same goal of integrity. When these integrity elements are coordinated in how they are applied, they strengthen one other to result in heightened integrity.

Accountability includes mechanisms that enable various stakeholders, including the public, to monitor activities of those with responsibility for implementing services that affect people and their environments. It means holding people and institutions accountable to do what they say they will do and are supposed to do. There are numerous types of accountability:
• **Horizontal accountability** consists of formal relationships within the state itself, whereby one state actor has the formal authority to demand explanations or impose penalties on another. Its focus is on internal checks and oversight processes. For example, executive agencies must explain their decisions to legislatures, and can in some cases be overruled or sanctioned for procedural violations.
• **Vertical accountability** is when citizens and their associations play direct roles in holding the state or the duty-bearer to account. Elections are the formal institutional channel of vertical accountability. But there are also informal processes through which citizens organise themselves into associations capable of lobbying governments and private service providers, demanding explanations and threatening less formal sanctions like negative publicity.
• **Diagonal accountability** operates in a domain between the vertical and horizontal dimensions. It refers to the phenomenon of direct citizen engagement with horizontal accountability institutions when provoking better oversight of state actions. Citizens bypass cumbersome or compromised formal accountability systems to engage in policy-making, budgeting, expenditure tracking and other similar activities. Diagonal accountability has been the locus of many innovations, especially in the last 20 years.
Being accountable means being liable, or answerable, to stakeholders of various types. It is considered a requirement for public officials, for officers and directors of companies, for managers and employees. For example, public officials, managers and other professionals are accountable to shareholders, clients, customers, patients, the general public, etc.

**Competence** ensures that one is qualified to do what one is responsible for doing, and responsive to the needs of those you do it for. Especially in Public Administration, recruitment processes need to be based on a merit system, rather than nepotism, cronyism or clientelism (i.e., hiring family members, hiring friends, hiring clients/supporters, respectively). A merit-based system ensures that persons are fit for their jobs and can do it in a professional way. When possible, especially when hiring persons in high-level public positions, it is important to have a transparent, open process, to ensure appropriate procedures are maintained and followed.

Competence denotes an organisation’s ability to meet performance objectives and satisfy the reasonable quality expectations of its internal and external stakeholders. This means ensuring its employees effectively deploy the skills and capabilities required to achieve its goals. It conveys a sense of reliability and addresses the "fit" between how the organisation carries on its affairs and what the needs of its stakeholders are. As such, it demonstrates a professional organisation being "fit for purpose" in the environment in which it operates. It requires a balanced mix of managerial and technical skills and attributes.

**Ethics** means doing the work with honour and public purpose. Ethics prescribe specific guidance on behaviours that should or shouldn’t be practised as a matter of personal, professional or organisational obligation. Integrity is not just acting ethically from a personal perspective, but it is also taking into account the benefit to the public. Integrity includes honesty and lawfulness; trustworthiness and fairness; social justice and equity; and recognising/respecting people’s rights. It is not just a personal issue, it is also a societal one.

**‘Without corruption’** or minimising corruption, calls for the implementation of a variety of corruption control mechanisms that make it difficult to act with corruption.

A useful, short definition of integrity is: ‘The Characteristics that together improve Trustworthiness to Stakeholders’ which reinforces the fact that it is not enough to trust, because the system must be worthy of that trust. Organisations with integrity demonstrate trustworthiness to internal and external stakeholders. The desired outcome is stakeholder trust.

Integrity exists and is strong only when all four elements are present: Accountability, Competence, and Ethics, with the absence of corruption or the mechanism for corruption controls.

Integrity is positive and proactive. Its focus is to prevent problems and if problems exist, to solve them.

It is important to note that anti-corruption activities are part of an integrity approach. The compliance elements within the anti-corruption work are an important foundation for any organisation. That means that having a basis of legislation, laws, regulations, rules, policies and procedures is important within any organisation, but it is not enough. To ensure an organisation works with integrity requires integrity activities. Integrity is multidisciplinary, cross-sectoral and interactive. (See more in Session 7 on Compliance and Integrity)

**Linkages to the human rights based approach to water**

Using a Human Rights Based Approach (HRBA) to water is often linked to integrity aspects, and the mutual understanding of the rights as well as obligations of the rights-holders and duty-bearers.

HRBA is custom made to serve to the principles of empowerment, participation, non-discrimination and accountability with priority on vulnerable populations. In a HRBA human rights determine the relationship between stakeholders with valid claims (rights-holders) and State with correlative obligations (duty bearers). When applied to the human right to water this relationship goes beyond the State also to non-State actors which are either formally delegated the responsibility of service provision, or have informal provision where the State has made no intentional decision to involve third party actors. However, the State remains the primary duty bearer, even if the lines of accountability become more complex when a third actor becomes involved.

The HRBA is a conceptual framework for the process of human development that is normatively based on international human rights standards and operationally directed to promoting and protecting human rights. It seeks to analyse inequities which lie at the heart of development problems and redress discriminatory practices and unjust distributions of power that impede development progress.

All people have the right to water, regardless of whether they belong to a vulnerable or marginalised group. Paying attention to the needs of vulnerable and marginalised groups is a means of ensuring water for all. Equity principles usually incorporate the populations most vulnerable, including displaced people, or people living in rural areas depending on subsistence farming. These
groups need to be considered and protected from inequitable allocation of water resources, especially with global trends such as climate change and economic recession that could increase the gaps of inequality even more.

However taking a HRBA to water is difficult due to several challenges that many countries face including: lack of economic policy that encourage equity; lack of effective voice and opportunities for meaningful participation among the poor; widespread clientelism and a commensurate absence of transparency and accountability; lack of resources; inadequate capacity for financial management; poor conditions of public services; government ministries and departments working in silo; a powerful executive unchecked by parliamentary oversight; a hierarchical, centralised government management structure; a legal framework that does not adequately safeguard the interests of the less powerful; and inadequate enforcement of laws and policies on the books. In this sense, the HRBA can function as a diagnostic tool to identify and address such deficiencies.

As such, a HRBA could be one of the frameworks by which water governance can improve, since it can help in the development of practical ways to manage water resources in a more sustainable way, especially in situations of competition and conflict.

National integrity system

The National Integrity System refers to the key ‘pillars’ in a country’s governance system, both in terms of their internal corruption risks and their contribution to fighting corruption in society at large. These pillars typically include:

- Legislative branch of government
- Executive branch of government
- Judiciary
- Public sector
- Law enforcement
- Electoral management body
- Ombudsman
- Audit institution
- Anti-corruption agencies
- Political parties
- Media
- Civil society
- Business

When all the pillars in a National Integrity System are functioning well, corruption remains in check. If some or all of the pillars wobble which often is the case, these weaknesses can allow corruption to thrive and damage a society.

Using an integrity lens

When needing to analyse a situation, process or system, it is helpful to use an ‘Integrity Lens’. This method relies on each of the elements of Integrity: Accountability, Competence, Ethics and Without corruption. A short and simple method of assessment is:

1. Accountability: Looking at the stakeholder relationships, procedures and policies and analysing them with respect to accountability.
2. Competence: Looking at each stakeholder and institution and analysing whether they have the competence to do their job well, or alternatively whether the institution has the ability to meet its performance objectives and satisfy reasonable quality expectations of its internal and external stakeholders.
3. Ethics: Looking at each stakeholder or institution and analysing whether they are behaving ethically or not, or alternatively if the institution is promoting ethical behaviour.
4. Without corruption: Looking at each stakeholder and institution and analysing whether they are behaving without corruption, or alternatively if the institution is discouraging corruption.

These steps can be further detailed by the following ‘Stakeholder Analysis Tool’ (Adapted from: www.odi.org/publications/5530-stakeholder-analysis and the User’s Guide on Assessing Water Governance).

Conducting a stakeholder analysis

Stakeholder analysis determines how to engage in your context. A stakeholder is a person who has something to gain or lose through the outcomes of a planning process. They can have a powerful bearing on the outcomes of political processes. Therefore, it is necessary to identify and analyse the needs and concerns of different stakeholders, particularly when the aim is to influence policy.

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22 Read more at www.transparency.org/whatwedo/nis
**Step 1:** Clarify the objective

**Step 2:** Identify all the stakeholders or interest groups. This can be done through a group discussion with a range of people from within an organisation with knowledge or contact with different stakeholder groups. Table 1 shows examples of stakeholders in water resources management.

**Table 1. Examples of stakeholders in water resources management**

<table>
<thead>
<tr>
<th>Public sector</th>
<th>Private sector</th>
<th>Civil society</th>
<th>External</th>
</tr>
</thead>
</table>
| • Ministries and government agencies (water, health, energy, agriculture, tourism, environment, etc.)
• Transboundary water institutions
• National statistical office
• Observatories
• Ombudsman
• Parliament
• Courts
• Local governments/councils
• Commission(s) (for example, anti-corruption or human rights commission
• Political parties | • Utilities
• Water vendors
• Corporations and businesses
• Business associations (drillers, hand pump mechanics)
• Professional bodies/associations (water operators, cesspool cleaners)
• Financial institutions | • Water users from different sectors (water, health, energy, agriculture, tourism, environment, etc.)
• Water user associations
• Media
• Religious groups
• Research institutions and think tanks
• Universities
• Social movements and advocacy groups
• Trade unions
• National NGOs
• Community-based organisations
• Traditional authorities | • Bilateral donors
• International agencies (such as the United Nations, World Bank)
• International NGOs |

**Step 3:** Organise the stakeholders according to their interest and power. ‘Interest’ measures to what degree they are likely to be affected by the subject in question, and what degree of interest, investment or concern they have in or about it. ‘Power’ measures the influence they have over the project or policy, and to what degree they can help achieve, or block, the desired change.

Stakeholders with high interest but low power need to be kept informed and, if organised, they may form the basis of an interest group or coalition that can lobby for change. Those with high power but low interest should be kept satisfied and ideally brought around as patrons or supporters for the proposed policy change. Figure 1 shows how a stakeholder grid can look like.

Where possible, it is important to fully engage stakeholders with high power and interests aligned with the project. If trying to create policy change, these people are the targets of any campaign. At the very top of the ‘power’ list will be the ‘decision-makers’, usually members of the government, who are influenced by ‘opinion leaders’.

Be sure to pay attention to spoilers as defined in Session 1 Corruption and Anti-Corruption Concepts and Frameworks. Engaging potential spoilers for instance local authorities or contractors early on, including in training sessions and working groups, rather than confronting them is critical to build trust, skills and collective positive action.
Step 4: Develop a strategy for how best to engage different stakeholders in a project, how to ‘frame’ or present the message or information so it is useful to them, and how to maintain a relationship with them. Identify who will make each contact, how they will communicate and how they will follow up. Keep in mind who can be gate-keepers to those who shape policy and practice. For example, it is useful to build a relationship with clerks at ministries as they often have access to information and can influence public officials. (Please see the advocacy tool in the Session 11 Advocacy for Reform)

Learning methods

Group Work:
1. Discuss each concept of integrity, using the list of sub-characteristics. Note that this list does not have all the sub-characteristics possible.
2. Conduct a Stakeholder Analysis for one of the Case Studies on Water Integrity (Appendix 2).
Session 3: Building trust and trustworthiness between public officials and civil society

Learning objectives
By the end of this session, learners will:
• Understand the importance of citizen engagement with public sector officials
• Understand the importance of building trust between the groups that is supported by trustworthiness, as a vital element of integrity
• Recognise the added value each target group has to offer to the other to improve public decision-making
• Have a better understanding of the ways that citizens can be involved in policy processes and public decision-making

Supporting materials
See presentation
Session 3_Building Trust

See document

Or see online link
www.watergovernance.org/sa/node.asp?node=1555 See Case Studies: All case studies are presented in Appendix 2

The following 2 case studies focus on how a former project called ‘Pro Poor Integrity’ (PPI) helped citizens engage with municipalities to improve water services:
www.integrityaction.org/case-study/water-shortages-drastically-reduced-hebron-palestine
www.integrityaction.org/case-study/jericho-palestine-water-campaign-stops-residents-sabotaging-their-neighbours%E2%80%99-water

The following 4 case studies from Palestine and Kyrgyzstan talk about how the PPI project staff worked with the municipality and citizens to encourage citizens to pay their taxes, which led to improved public services.

The citizens saw exactly how their money was being used, and began to develop trust in their local government and vice versa – each side was properly carrying out its responsibility.

www.integrityaction.org/case-study/integrity-drive-kyrgyzstan-leads-cleaner-city
www.ppi.integrityaction.org/content/council-services-improve-thousands-residents-start-paying-taxes

Building trust through the involvement of stakeholders
Integrated Water Resources Management (IWRM) as “a process which promotes the coordinated development and management of water, land and related resources, in order to maximize the resultant economic and social welfare in an equitable manner without compromising the sustainability of vital ecosystems” has been promoted since 2002, following the enactment of the Bruntland Report and Dublin Principles. In the latter set of principles, agreed at the International Conference on Water and the Environment in Dublin, 1992, out of four principles, two discuss the involvement of citizens:

Principle 2: Water development and management should be based on a participatory approach, involving users, planners and policymakers at all levels. The participatory approach involves raising awareness of the importance of water among policy-makers and the general public. It means that decisions are taken at the lowest appropriate level, with full public consultation and involvement of users in the planning and implementation of water projects.

Principle 3: Women play a central part in the provision, management and safeguarding of water. This pivotal role of women as providers and users of water and guardians of the living environment has seldom been reflected in institutional arrangements for the development and management of water resources. Acceptance and implementation of this principle requires positive policies to address women’s specific needs and to equip and empower women to participate at all levels in water resources management, including decision-making and implementation, in ways defined by them.

Once public agencies in water resources management recognise the mutual benefit of public officials and citizens having ongoing communication, cooperation and collaboration, it is important to build trust between the two stakeholder groups on a steady basis. Public officials hold power and authority over citizens, and such officials who control this vital natural resource and life-saving commodity which water is, need to maintain high ethical standards and accountability to the community. In small and large communities, word spreads quickly when even one person is caught due to misconduct, corruption or maladministration. Even a public agency that has held a good reputation and record of integrity can lose the public’s trust by the misdeeds of one public employee.

To build trust, the heads of the public agency should strive for the following:
- Prevent misconduct within their agencies
- Properly address misconduct, should it occur
- Build and maintain community trust and confidence
- Create and maintain an ethical work environment
- Develop and sustain trust between organisations and communities that they serve.

Therefore building and maintaining trust entail a continuous process that must send a clear message to the community that their trust is supported by trustworthiness – which means that if you trust someone, you want that person to deserve your trust by being trustworthy.

If trust is desired, it must be built into the basic organisational platform – whether it is a public agency, NGO or business. Useful practices include incorporating integrity and incentives for integrity into recruitment and hiring; policies and training; rewards and discipline; and transparency of the organisation’s activities.

Strong accountability is an element that can build trust by engaging the stakeholders in a variety of trust-building initiatives, including citizen involvement both by informal mechanisms, as well as formalised ones – some of the latter being mandated in different countries.

Another way for public agencies to build trust is for them to proactively maintain a relationship with citizens and citizen groups, to prevent problems when or if a high-profile misconduct situation occurs. It is also important for the governing bodies of any public agency to be engaged in the entire trust-building process, and to support financially and programmatically, effective trust-building initiatives.

Specific activities to build trust internally include:
- Strengthening the organisational platform with integrity messages (core values, ethical principles, etc) and implement culture-changing policies, programmes and trainings
- Organisational leadership repeating integrity messages and modelling integrity behaviours
- Improving the recruitment policies and procedures for enhanced transparency – sometimes even by adding a few citizens onto the recruitment committee
- Reviewing the integrity and ethical behaviour policies from recruitment through to retirement
- Incorporating integrity incentives into the Human Resources policies – ask one’s employees what would incentivise them to work with integrity; for example, when holding regular employee evaluations, make integrity one of the criteria for public recognition, promotions, salary raises, etc
- Intervening when integrity problems with an employee are minor. Often, a minor problem becomes a bigger one, which is often much more difficult to solve successfully.

Integrity is basically the characteristics that improve trustworthiness to stakeholders.

25 These were adapted from: U.S. Department of Justice, Office of Community Oriented Policing Services. ‘Building Trust Between the Police and the Citizens They Serve’. Retrieved February 25, 2015, from www.theiacp.org/portals/0/pdfs/buildingtrust.pdf
• Training one of the employees and assigning him/her the role of an Integrity Officer, or an Integrity Focal Point who is someone who helps other employees confidentially deal with integrity or ethical challenges faced in the organisation.

Specific activities to build trust externally include:
• Engaging the community in your agency’s activities
• Consulting the community before making decisions that will affect them
• Publicising special programmes and activities about the agency
• Holding periodic community meetings on progress within the agency’s development plan
• Be transparent when misconduct occurs in the agency, how it is handled and what is being done to prevent it from reoccurring.

When many of the above elements are in place, community trust should be strengthened, and collaboration and cooperation that follow can be beneficial to all parties involved.

**Learning Methods**
The above-referenced case studies describe how citizens and local government found ways to work together using integrity building practices. Read the case studies and pull out common themes to building trust.
Session 4:
Competence, capabilities and leadership – Strengthening ethical competence

Learning objectives
By the end of this session, learners will:
• Understand how to identify integrity or ethical challenges
• Analyse the situation using an ‘integrity lens’, covering Accountability, Competence, Ethics and Corruption Controls
• Be aware of new materials in a variety of media that can be effective in developing ethical competence

Supporting materials
See presentation
Session 4_Competence&Capabilities&Leadership

See document

See film
'Just Do Your Job' www.youtube.com/watch?v=aSNJMe46EM8&feature=youtu.be

Recognising when you face an integrity or ethical challenge
Ethical competence entails being able to carry out the following tasks:
• Identify integrity or ethical challenges
• Analyse the situation
• Design a plan for solving the situation
• Implementing the plan

The way to do this is to become familiar with the behaviours that are first of all, considered criminal offences according to the United National Convention against Corruption 2003, which include:
• Bribery of public national officials
• Bribery of foreign public officials and officials of public international organisations
• Embezzlement, misappropriation or other diversion of property by a public official
• Trading in influence
• Abuse of functions
• Illicit enrichment
• Bribery in the private sector
• Laundering of proceeds of crime

It is likewise important to become familiar with integrity or ethical violations, which include activities such as maladministration, misconduct related to illegal activities or violations of organisational rules or procedures, and ethical standards.

Learning methods
Exercise 1
Show the learners the training film Just Do Your Job link: www.youtube.com/watch?v=aSNJMe46EM8&feature=youtu.be prepared by Integrity Action about an event that occurred in a government audit office in Nigeria. Ask them to identify the integrity challenges in the film. The environment will not necessarily be their own, however the integrity challenges raised will undoubtedly be familiar. Often, learners only identify up to 5 challenges, while in the film there are at least 15 challenges. It’s not as easy as it looks. Some areas to consider are: self-interest, intimidation, hiding evidence, bribery, conflict of interest, abuse of power, sharing confidential information.

The film that will be viewed in this session has a water connection – ask the learners to identify it. It is an example of a local risk that if it were transparent, it would need attention from the water sector.

Or
Exercise 2
Review examples from the Training Manual on Water Integrity (2011) that show various cases where integrity measures were used to improve service delivery. These spell everything out for the learners, so you may want to think about how to leave some of the analysis for the learners. See following reference pages from the Training Manual on Water Integrity (2011):

Ethical dilemmas in the above examples
Conflict of Interest – in this case the conflict of interest is created by having the policymaking and regulatory functions as well as the operational (provision) function being handled by the same national government body. However, at the local level, a law was enacted to separate the dual control; by separating them, accountability improves and regulatory oversight is stronger. [p17 - Example South Africa]

Since the problems were identified in the beginning of the example, we suggest giving the learners the example without the lessons learned, and ask the learners to identify the benefits created by organising the work with a multi-stakeholder group. Problems identified through resource: inadequate integrity in the Uganda water sector has resulted in many negative impacts, such as: losses in investment, exploitation of contractors, compromised professionalism, contracts issued for personal gain rather than competence or merit, resources lost on shoddy and incomplete works and political decisions to target services and investments for the most affluent at the expense of the poor. [p47 - Example 2 Uganda]

Secrecy in banking laws – certain countries have laws that prohibit the sharing of information or disclosure of funds deposited in their bank, or the identities of the owners of the accounts. [p59 - Lesotho Highlands Project]

Discrediting the media (by government) – government regimes often challenge the media’s role in accountability, through strong power plays. [p60 – Role of Media]

Bribing of officials to get projects – whether through tender or otherwise;

Cuts made by upper levels of government – cuts in the project by senior government managers, who pocket the remaining funds;

Illicit fees – asking for and receiving extra fees that are not part of the contract or budget; Under-delivery of materials/services – fewer materials were delivered and used, with the responsible employee pocketing the remaining unspent funds;

Embezzlement by staff – money stolen. [p68 – Applying Transparency Principles Through the Project Cycle] - Use the ‘Questions on the Ground’ for this Example.

Lack of due diligence – not following required procedures to check whether all is right with how something is handled; in procurement, often the technical analysis is either not done, or done improperly; Bribes – payments made to responsible manager in order to obtain votes for winning a tender; these could be initiated by the implementing company, or by the government officials;

Favouritism – giving a ‘favourite’ person unfair advantage. This gives good information about why companies might want this type of a ‘self-regulating’ agreement – worth a good discussion. [p69 - Columbian Case - anti-bribery agreement]

Integrity pacts – This is an interesting tool that has had mixed results, but has worked in certain cases (esp. in South America). The elements are good for learning about how to make a process more transparent and fair. [p73 - Integrity Pact]

Collusion – mutual secret or illegal cooperation or collaboration to cheat or deceive others; with E-Procurement, collusion and other types of unethical or illegal
behaviours (bribery, fraud, kickbacks, etc) are made much more difficult, particularly by eliminating the direct contact between bidders and the decision-makers. [p75 - E-Procurement and Quality Assurance - East Java]

**Lack of government accountability (in service delivery)** – a situation where government does not provide good access to information, is not consistent in the way it provides service to different groups in the population, and is not transparent about decisions, plans, budgets, etc.; citizen activism and advocacy can change this, by pressuring leaders to fulfil their responsibilities in delivering public services and implementing decisions fairly, professionally and transparently. [p91 - Case Study 1 - Citizen Action on Water Supply and Sanitation Services]

**Lack of transparency regarding rights of citizens** – providers do not share information about citizens’ rights (and responsibilities); Poor communication from providers to citizens – providers do not provide sufficient information about the services provided (or not provided). [p91 - Case Study 2 - Citizen Participation and Feedback]

**Lack of monitoring and evaluation of public projects** – without oversight on the ground, ethical challenges can be present in every stage of public projects; the public’s participation as monitors, together with the government and project implementer, can reduce these problems significantly. [p99 - Public Participation - Consultative Management in Thailand]
Session 5:
Transparency – Accountability – Access to information

Learning objectives
By the end of this session, learners will:
• Understand why access to information is important
• Know the best uses of transparency and accountability
• Be familiar with different kinds of tools for accessing and collecting data

Supporting materials
See document

Or see online link
www.watergovernance.org/sa/node.asp?node=1555


Background to information laws within programme countries

Jordan, Lebanon, Palestine, Morocco, Tunisia (draft or full right to information laws in place).

Corruption is a huge obstacle to social justice, human rights and development. Corruption by its very nature is often secretive and hidden. One way to overcome this secrecy is to improve transparency and access to information so that stakeholders can be held to account.

What is transparency?
Transparency is a tool that helps us be accountable. Making information transparent – exposing data and reports to the public – does not in itself increase accountability. Some governments publish versions of the national budget on their website. It sounds good, but often the information is simply massive, making it difficult to find or distinguish critical information. The information may be written in professional language that is not easily understood by regular citizens.

Recommendations for publishing clear, ‘plain language’ versions of public documents are growing, and more governments are doing so.

Access to Information is another tool similar to transparency that makes being accountable possible. Without being able to acquire the information necessary to understand policy processes and other decision-making, citizens would be unable to engage in public discussions or influence the decision-making process.

Who needs access to information? Everyone does: The general public, NGOs/CSOs, Officials in the Public Sector – at all levels, as well as Businesses.

At this time, most countries have Access to Information laws, but this does not mean that information is readily accessible. There are several reasons for this among which are often a lack of political will to actually release the information; employees are not always trained in how to respond to access to information requests; and the poor management of information.

Access to information is a human right and therefore whether a law is in place within a country or not, citizens have the right to request information.

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The importance of freedom of information as a fundamental right is beyond question. In its very first session in 1946, the UN General Assembly adopted Resolution 59(I), stating, “Freedom of information is a fundamental human right and ... the touchstone of all the freedoms to which the United Nations is consecrated.” Abid Hussain, the UN Special Rapporteur on Freedom of Opinion and Expression, elaborated on this in his 1995 Report to the UN Commission on Human Rights, stating: Freedom will be bereft of all effectiveness if the people have no access to information. Access to information is basic to the democratic way of life. The tendency to withhold information from the people at large is therefore to be strongly checked.

Therefore in order to obtain access to information, we encourage citizens to use the following two options:
1. Request information needed
2. Create information needed

[If information is not readily available, citizens have the option of collating the information themselves from other sources or repeatedly asking the information holder until the information is disclosed]

Guidelines for how to access Information
– Guidelines for making information requests

How to make a request?
• Be clear and very specific about the information or documents that one is looking for.
• Keep the first request relatively simple. That way one has a better chance of getting a quick answer, and one can always make follow-up requests if necessary.
• One does not have to mention the right to information act or freedom of information law, but this can be useful because it shows that one knows ones legal rights.
• State politely which format is preferred. If one wants information electronically, an e-mail address must be provided. The advantage of electronic information is that it usually saves one from paying photocopying and postage fees.
• Use language and etiquette that is appropriate for any other professional communication or correspondence in the specific country.
• Provide contact information including name, address, email address and phone number.
• File the request in written form (by email, post, fax, in person) or make an oral request (by telephone, in person). However, written requests are useful if one needs to make an appeal in cases where no response was received - just remember to make a copy of the original request.
• Remember: One does not have to explain why the information is requested nor what it will be used for.

TIP: If one lives near where the information is held (for example, if one lives in the capital city where the documents are kept), one can also ask to inspect original documents. This can be helpful when researching information that might be held in a large number of documents, and one would like to have a look through them.

Example Information Request Letter:

February 1, 2015
Dear Sir/Madam,

I am writing to request the following information under the Right to Information Act, 2007:
• The total amount of money spent during each of 2006, 2007, and 2008 on vaccinations for children under the age of 10 years old. I would like this information broken down by year, and if possible, by month.
• The total number of children vaccinated in each of 2006, 2007, and 2008 under the government’s new “Vaccines for All” programme.

I would prefer to have this information sent to me electronically to the e-mail address that is provided below.

If you have any questions or need further clarification about this request, please do not hesitate to contact me.

Sincerely,

Sa’ela Almostafsera
Al Manara Street, Capital City
E-mail: S.Almostafsera@emailme.com
Tel: 123-456-7890

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Does one have to pay a fee to ask for information?

- Filing a request for information is usually free of charge. In a few countries, this is not the case and there is a small fee.
- One can ask the public agency to send the information either to a postal address or an email address. If one asks for paper copies sent by post, then there may be charges for photocopying and the postage costs. Electronic delivery should be free.
- In some cases one will be asked to pay a fee for receiving information in other formats (for example, photocopies, CDs, DVDs, etc.) but in most cases the public agency is not allowed to charge more than the actual cost of copying the information onto any given format.
- The fees charged for photocopying, postage, or for materials such as a CD or DVD should be according to already published rates. If one suspects being charged too much, a concern should be raised with the public body and/or with the ombudsman or information commissioner.

When and how the information will be received?

- Format varies depending on the request and availability: inspection of originals, photocopies, e-mails, files attached to e-mails, DVDs, CDs, etc.
- Countries have different time frames for answering requests or providing information, as well as for notifications of extensions or issuing refusals.
- Most countries permit public agencies to extend the timeframes for a few days or up to a month if the information request is particularly complex. In all cases, the requestor should be notified of the delay and the reasons for the delay should be explained.

For some examples of successful information requests, see Freedom Forum’s website: www.freedomforum.org/

What happens when one does not get the information asked for?

If one does not get the information asked for, one have the right to appeal. There are normally at least two stages of appeal:

**Stage 1:** Appeal to the public agency that refused to give the information or that failed to answer. Normally the appeal letter should be sent to the head of the public agency; however, one should check what the national right to information law says in one’s country. In countries that have good right to information laws, there will be a simple and clear system for filing appeals.

**Stage 2:** Appeal to the courts or, if the country has one, the information commission. One can also appeal to information rights advocates in the country or international organisations, including Integrity Action and Access Info, who can help follow up on the requests.

**TIP:** If one is not sure what to do for the first stage of appeal, contact the office of information commission/commissioner for help. If one is still having problems, then contact Access Info (helpdesk@access-info.org) and let them know about it. They will try to help, for example, by giving advice on how to appeal or by finding an access to information expert or lawyer in that specific country.

Donor countries with access to information laws

In donor countries with access to information laws, these laws cover all central government ministries, including aid agencies. Information requests can be made to the local office of the donor’s aid agency in any country, or by email or letter to the head office of the agency in the donor country.

**Learning methods**

Group Work by Sector: Look up the websites of the water governance and management departments, ministries and offices. Summarise the types of tools making information available to the public, the degree to which the information available is relevant to people who want to understand the water management issues, comprehensive and understandable by a lay person. For inspiration check out the Water Management Transparency Index in Spain.

**Plenary discussion**

Groups report back to the plenary: whether the tools for transparency and accountability in the sector meet the needs of the people. Are these tools helping to build integrity? What are the reasons that information is not shared?
Session 6:
Creating a culture of openness – Transparency and accountability in budgeting, planning, contracting and procurement

Learning objectives
By the end of this session, learners will:
• Understand what tools can strengthen integrity in:
  – budgeting,
  – procurement
  – contracting
• Be familiar with ways to incorporate integrity tools into these processes.

Supporting materials
Presentations
Session 6_Transparency and Accountability

See Document
Integrity Pacts in the Water Sector Transparency International (www.transparency.org/whatwedo/tools/resources_about_integrity_pacts/4/)\(^3\)

See Document
Malaysian Newsletter Certified Integrity Officers and Integrity Pact March 2013

See Toolkit\(^2\)

Open government: needs a threefold perspective
• Transparency, in other words being exposed to public scrutiny;
• Accessibility to anyone, anytime, anywhere; and
• Responsiveness to new ideas and demands.

A demand for change
• The Global economic crisis acted as catalyst for demands for a new social contract between governments and citizens based on improved transparency and accountability.
• Austerity measures including cuts in public spending and a renewed emphasis on ‘Value for Money’

Open government: new initiatives
• Growth in social movements e.g. Occupy movement, Arab Spring, Spanish Indignant and Tea Party making demands of government
• Growth in global initiatives that to some extent respond to that demand e.g. Open Government Partnership, Global Initiative for Fiscal Transparency, Open Contracting Partnership, EITI, CoST, MeTA

Today, open government is about how government can work with society and individuals to co-create public value.

Specifics for water
The management of public expenditure is a crucial aspect in the global good governance agenda, including global water governance. Within the water sector, integrity is compromised in various management and governance processes especially in the relationship between the different stakeholder groups. See Figure 2 for a short summary of integrity risks in the interface between the public agencies and other stakeholders.

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Figure 2. Selected integrity risks in the relationship between public agencies and other actors in the water value chain framework

<table>
<thead>
<tr>
<th>Process</th>
<th>Public-Public</th>
<th>Public-Private</th>
<th>Public-Consumer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning &amp; budget</td>
<td>• Distortions in decision on locations, priorities</td>
<td>• Bribe to influence fund allocation</td>
<td>• Denied access to project plan, budget amount</td>
</tr>
<tr>
<td></td>
<td>• Diversions of funds</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Faslification of budget</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tendering &amp; procurement</td>
<td>• Cover up, collusion, favoritism in procurement process</td>
<td>• Kickbacks to influence or secure contacts</td>
<td>• Distorted information shared about bidding process</td>
</tr>
<tr>
<td>Construction phase</td>
<td>• Approve poor quality construction</td>
<td>• Not building to specifications</td>
<td>• Corruption in community based construction projects</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• False invoicing</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Underpayment of labour</td>
<td></td>
</tr>
</tbody>
</table>

Source: Global Corruption Report 2008

In public contracting activities where integrity is compromised include: Procurement, privatisation, licensing, concessions and other forms of contracts. These public contracts play two roles:

• Contracts are vehicles in which large sums of public money are spent
• Contract are vehicles for implementation of policy and hence have high impact on their outcome.

The contracting process, by which decisions about water resource management are taken and implemented, needs to ensure that they are attending the public good. There are different ways of protecting the public expenditures of which some initiatives are described below:

**Budgeting:**
Open budgeting and public consultations have made a difference in building integrity. The aim is to advocate for governments to give the public access to budget information and opportunities to participate in the budget process at a national, regional and local level.

**Procurement:**
Currently a considerable re-assessment by large International Financing Institutions and others, such as the World Bank, and the OECD of the way procurement is done with an emerging discourse surrounding the need to build a culture of integrity and allow discretion within procurement to deliver better outcomes and value for money.

**Contracting:**
The Open Contracting Partnership works on principles whereby there is an inherent belief that increased disclosure and participation in public contracting will make contracting more competitive and fair, improving performance and securing development outcomes.

**Other tools that help achieve greater openness:**
Integrity Pacts
Participatory budgeting (PB)
Transparent water budget processes, including information about water infrastructure investment planning and implementation (financial, technical, and socioeconomic impacts)
Civil Society Procurement Monitoring (CSPM)
Citizen Report Cards

**Learning methods**
Group Work and Plenary Discussion: Conduct group work on how the presented tools can be applied in water resources management, and assist the learners in preparing recommendations for greater openness of information between the government and the public.

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Session 7:
Compliance and integrity approaches

Learning objectives
By the end of this session, learners will:
• Understand the main elements of the compliance and integrity approaches.
• Distinguish between the compliance and integrity approaches and understand the added value of the integrity approach.
• Be able to identify what types of decisions and activities belong to each of the four quadrants: Reactive Compliance, Proactive Compliance, Reactive Integrity, Proactive Integrity

Supporting materials
See presentation
Session 7_Integrity And Compliance Steps & Differences

See documents
For descriptions of the activities mentioned in Figure 3 below, please see Appendix 3: Integrity Action Glossary of Terms on Integrity and Public Administration at the end of this guide.
See also Appendix 4 Compliance and integrity ethical challenges

Integrity is more
Much of the anti-corruption work is based on compliance with laws, regulations, policies, procedures and systems. These are all critically important in setting the foundation within an organisation of which behaviours are acceptable, which are not, and what the rules are. But integrity work is broader than anti-corruption.

Integrity is proactive, making one go beyond just following the rules. It makes one do more.

Figure 3 on the following page illustrates what distinguishes a proactive approach based on integrity from approaches that are compliance driven or more reactive. Most organisations currently invest in a mix of reactive compliance approaches and reactive integrity approaches. Some also invest in proactive compliance approaches, but proactive integrity approaches remain a poorly articulated aspiration for most companies and organisations. Figure 3 also suggests that there are different levels of risk and return for each of these approaches. While reactive strategies are generally low risk they also produce low returns. The proactive strategies for compliance are medium risk and generate medium returns. The proactive integrity strategy is high risk – at least in the beginning - but it also produces the highest return. Ultimately, the biggest return would come from a comprehensive “Integrity and Compliance” strategy of an organisation, including business or government agency, which implements action plans in all four categories. Although it may seem counterintuitive, evidence suggests that the fastest route to a comprehensive strategy might be to start in the upper right-hand quadrant, with a proactive integrity approach and work backwards to incorporate the other three.
Compliance focuses on ‘following the rules’, ‘identifying the problems’ of corruption/maladministration, and prosecuting the violators. Integrity, on the other hand, focuses on finding solutions, recognising that giving perpetrators an opportunity to change their behaviours and act with integrity, is a productive long-term solution. When positive incentives are offered to those who act with integrity – i.e., that within organisations, integrity behaviour is valued and rewarded (e.g., recognition within the organisation, in promotion opportunities, in being an acceptable bidder in tenders, etc) – the organisational framework becomes one that values and encourages integrity, rather than corruption.

When litigation and prosecution of violators is the main outcome of identifying corruption, then everyone involved loses. If the government is implementing a project, and the implementer is found to have acted with corruption or maladministration, if they are only prosecuted and jailed, then the government must find new funds to pay for the project, the beneficiaries have delays in benefiting from the project (whether a service or an infrastructure project), and the perpetrator is not given the opportunity to correct its wrongdoing and begin to work with integrity.

Integrity is not just the absence of corruption, it is proactively promoting integrity. It is similar to the change that was made in the public health field, when it used to be that people only went to their doctors when they were sick, but the focus was changed to emphasise promoting better health and preventing disease. The same with integrity and corruption: it is better to promote stronger integrity and prevent corruption and maladministration. The tools, therefore, have to be the right ones to accomplish this.

A strong system has a foundation of compliance within an overall integrity approach, the latter employing incentives for integrity and all its elements (accountability, competence, ethics, corruption controls), multi-stakeholder initiatives, and public participation and engagement.

**Learning methods**

Divide learners into groups to review a set of scenarios in compliance and integrity, as described in Appendix 4, to practice decision-making and finding solutions to problems, and to categorise each decision or solution according to whether it is a reactive compliance, proactive compliance, reactive integrity, or proactive integrity based decision/solution.
Session 8:
Integrity risk assessment

**Learning objectives**
By the end of this session, learners will:

- Know how to use an 'integrity lens' for analysis.
- Be familiar with some methodologies for assessing water integrity risks
- Apply their newly gained integrity knowledge and tools to identify integrity risks within an organisation, and formulate integrity solutions to mitigate those risks

**Supporting materials**

*See document*

*See document*

*Or see online link*
www.watergovernance.org/sa/node.asp?node=1555

**Assessing risks**
A risk is a future event that may have an impact on a project or an organisation. It may happen or it may not. One can plan for a risk based on its probability and impact on deliverables – risks can be avoided completely, or can be minimised, or can be transferred to other party, or one can try and deal with the risk directly by implementing some mitigation strategies.

The importance of specifically identifying risks and being skilled in formulating solutions to mitigate these risks cannot be overstated. Institutions rise and fall on how they handle risk. If one is not aware of dangers lurking around the corner, then one won’t be ready for them when they appear at one's door. Therefore it is critical to set a schedule for when to assess and then reassess risk in one’s organisation and in its systems and procedures.

**Applying an integrity lens**
One way to assess integrity risks is to apply the Integrity Lens to a specific project, programme, organisation, governance framework etc. This method relies on each of the elements of Integrity: Accountability, Competence, Ethics and no corruption as described in Session 2.

**Assessing transparency, accountability and participation in water**
More detailed guidance on how to assess levels of transparency, accountability and participation in relation to water can be found in chapter 5 in the User’s Guide on Assessing Water Governance.

**Corruption risk mapping**
Although no single agreed upon methodology for corruption risk assessment in the water sector exists some useful frameworks have been developed in recent years such as the Water Sector Value Chain and the Corruption Interaction Framework, the Annotated Water Integrity Scan and more. This is described in detail in the Training Manual on Water Integrity (2011) Module 3.

Contracting and procurement are two of the main processes in which corruption is often found in relation to water. For examples of corruption risks in the Contracting Process see Training Manual on Water Integrity (2011) Module 5, pages 71-72.

**Learning methods**
Group Work: Learners should review issues and risks within their areas of influence making use of the supporting material and attempt to match risks with appropriate mitigation strategies and tools presented in the previous sessions.
Session 9:
Developing deeper knowledge of relevant integrity concepts

**Learning objectives**
By the end of this session, learners will:
- Understand more deeply relevant integrity concepts
- Develop a set of useful terms for review and discussion among their staffs and colleagues
- Be able to apply terms usefully in an effort to strengthen integrity within their organisation

**Supporting materials**
See document
Appendix 3: Integrity Action’s Glossary of Integrity and Public Administration terms.

**Learning methods**
Individual Work: Each learner will look through the glossary and identify 10 unfamiliar terms to discuss them with a colleague.
Session 10: Monitoring and evaluation

**Learning objectives**

By the end of this session, learners will:

- Understand the importance of measuring change within the water sector
- Identify appropriate tools to monitor and evaluate change for each target group
- Understand the difference between input, output, outcomes and impact
- Be able to develop basic indicators

**Supporting materials**

*See presentation*  
Session 10_Monitoring & Evaluation

Improving integrity through monitoring and evaluation

When thinking about monitoring and evaluation in the water resources management it is important to ask:

- Is integrity in water management procedures and practices regularly reviewed?
- If so, by whom?
- Are the results made public?

**Why use log frames for M&E?**

A log frame is a tool for improving the planning, implementation, management, monitoring and evaluation of projects. The log frame is a way of structuring the main elements in a project and highlighting the logical linkages between them. Sample log frames are showcases in presentation 19 (see above).

**M&E and the role of public servants**

As a public servant, officials should be proud of the work that they do, and have a good relationship with the people they serve. If they do their work with integrity, then they are accountable to the people (besides being accountable to their superiors and others), competent in their jobs, working ethically with concern for the public good, and they do it without corruption.

But being proud and thinking that one is doing a good work is not enough. To really understand how well the job is done, there should be self-monitoring of the work. This means to gather information from the ‘clients’ regarding the degree of satisfaction with the level and quality of service delivery. This will help to understand how well the work is done – according to the users – and hopefully contribute to understand how the service delivery can improve. This can be done with various methods of data collection:

- Designing Questionnaires for Interviews, Surveys and Group Discussions

**Step 1:** Always clarify the purpose and scope of the survey, interview or group discussion.

**Step 2:** Draw on external skills and expertise if necessary. Using surveys, interviewing people and facilitating group discussions requires some special skills. One does not have to be an expert, but it will be necessary to draw on people with experience in statistical research along the way.

**Step 3:** Identify who one will gather evidence from. The evidence one gather with a survey will only be seen as representative of a wider population if the sample has been chosen very carefully. One may want to get help from a statistics expert with experience in constructing reliable samples. If one is planning to track public expenditure with the survey, then it is necessary to make a list of the officials, front-end service providers and others to interview. If one is planning a group discussion it must be ensured to do some stakeholder analysis first to engage the right people.

**Step 4:** Design a questionnaire. The way one formulate the questions for the survey will determine what kind of evidence to gather. It is also useful to think about the order of the questions. The answer to one question could have a bearing on the way to ask the next one. Remember that completing a survey can be time-consuming; so keep it as short as possible. Have a look at some surveys that have been used by other CSOs to monitor policies and if possible talk to them about what they have learnt.

**Step 5:** Coding Responses. To record evidence in a quantitative way, it needs to be counted or coded in numbers. This can be built into the design of the questions and answers (which is called pre-coding).

When information is coded, it means that number values have been assigned to different categories of data. For example, wherever people have chosen the same answer to a closed question in a survey, their responses are given the same number value. In principle, one can assign number values to any evidence that have been gathered, even from focus group dis-
Discussions or other less structured methods (though this may call for assistance from someone with expertise in data analysis).

Closed questions tend to be pre-coded. For example, in relation to a policy on security, one may ask the following question:

What do you think about the provision of water services in this city?

Very good  1  
Good   2  
Fair   3  
Poor   4  
Very poor  5  

Pre-coding is also possible when one is using observation to gather evidence. For example, in order to track a water distribution policy, active citizens could be trained and asked to survey community members to gather information. They could then use the following system to encode the data they gather in a community where water is distributed periodically, i.e., not constantly through a national water distribution system:

How often was water delivered:  
1. To homes in neighbourhood XX  
2. To homes in neighbourhood YY  
3. To hospitals  
4. To schools  
5. To farmers  
6. To factories

Open questions are answered in respondents’ own words. These answers can be coded afterwards (which is called post-coding). This involves assigning number values to different responses or themes so that they can be counted and compared.

In the example on water distribution policy above one could give a certain numerical value to each response.

**Step 6:** Get feedback and/or test the questionnaire. Ask different stakeholders to have a look at the draft questionnaire and have it checked by someone experienced in drafting surveys. Pre-test the questionnaire with a few people from the target sample to make sure all the questions are understood and flow well in order. Check that the survey makes adequate provision for recording answers and other information.

**Step 7:** Choose & train interviewers. Depending on the scale of the survey, one may need to identify and train people to help conduct the survey, interview or lead group discussion. If the survey is part of development monitoring project then monitors could conduct the surveys. One will need to ensure they have skills in communication, interviewing and recording information. They should understand how essential it is to ensure accurate and reliable data and know how to act ethically in interview situations. It may be necessary to provide training in these areas.

**Step 8:** Carry out the activity. This part of the survey process usually involves sending monitors or interviewers out into the field to gather information from the targeted respondents – individually or in focus groups. The monitors follow the question schedule on the questionnaire and record the responses.

**Step 9:** Compile, analyse and validate the data. Once the surveys, interviews or group discussions have been conducted, the responses have to be tabulated. This means recording all the responses in tables, so that one can group them together in a way that will help to analyse them later. This is ideally done with the aid of a computer, but it can also be managed on paper. Either way, it is essential for the data to be recorded accurately and this can be a meticulous, painstaking task. It is best tackled by people within or outside the network who have some experience in working with large sets of data.

The analysis and validation of the data needs to be accurate so as to avoid incorrect findings. When evidence is expressed in the form of numbers, (i.e. it has been coded) it makes it easier to work with large volumes of information. It also allows to use the data in useful ways:

- Summarise and present the information in several ways. Coding responses in numbers helps to count up and portray the findings in a concise and straightforward way.
- Highlight some of the features of a particular category of information. For example, one can calculate the average across a range of responses, (the median), or the most popular responses (the mode).
- Compare the relationship between different sets of information. For instance, the coding of the information can help to work out if there are any overlaps between people’s responses to two (or more) questions.

**Step 10:** Reporting and Communication. After validating the field data, one need to determine what questions are the most important to answer in order to improve the integrity of development projects, and what can be done to make policies more appropriate? What are the facts? What do the facts tell us? And what actions and changes are needed as a result of those facts? Does the data tell us that something should be done to improve the planned and current development
projects, programmes and services and which are the policies that need to change?

When analysing data one may find that changes need to be made to a development project, programme or services, and the need to communicate this to the appropriate audiences. One should identify those audiences with whom it is needed to communicate to achieve the objectives. It is useful to start by asking the following questions:

- How can one communicate this data, so it is used to inform future policy and practice?
- Who are the appropriate target audiences?

There is no single, best, generic solution to these questions. The best answers will vary by the project, programme or service being monitored and from situation to situation.

Look at the tools on developing an advocacy strategy and conducting a stakeholder analysis to help. Following are examples of types of questions for a survey of satisfaction of beneficiaries with water services provided.

<table>
<thead>
<tr>
<th>Type of question</th>
<th>Example questions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Open questions:</strong></td>
<td>What do you think about the water services being provided to your neighbourhood?</td>
</tr>
<tr>
<td>- Allow the respondent to answer in his or her own words.</td>
<td></td>
</tr>
<tr>
<td>- (He/She is not prompted to answer in any particular format.)</td>
<td></td>
</tr>
<tr>
<td><strong>Closed questions</strong></td>
<td>Do you think the water services provided are:</td>
</tr>
<tr>
<td>Provide the respondent with a limited range of responses to choose from. This is often called a multiple-choice question.</td>
<td>a) Very good</td>
</tr>
<tr>
<td></td>
<td>b) Good</td>
</tr>
<tr>
<td></td>
<td>c) Fair</td>
</tr>
<tr>
<td></td>
<td>d) Poor</td>
</tr>
<tr>
<td></td>
<td>e) Very poor</td>
</tr>
<tr>
<td><strong>50/50 questions</strong></td>
<td>The water services you received today were delivered in a friendly, professional manner. True or False?</td>
</tr>
<tr>
<td>The respondent is given a statement or range of statements and is asked to decide whether s/he agrees or disagrees with each, or whether each is true or false. There are only two possible responses to each question.</td>
<td>Water provided is:</td>
</tr>
<tr>
<td></td>
<td>a) Delivered on schedule</td>
</tr>
<tr>
<td></td>
<td>b) Delivered without a schedule</td>
</tr>
<tr>
<td></td>
<td>c) Expensive</td>
</tr>
<tr>
<td></td>
<td>d) Correctly priced</td>
</tr>
<tr>
<td></td>
<td>e) Too low</td>
</tr>
<tr>
<td></td>
<td>f) Of low quality</td>
</tr>
<tr>
<td></td>
<td>g) Of high quality</td>
</tr>
<tr>
<td><strong>Tick all that apply</strong></td>
<td>Water provided is:</td>
</tr>
<tr>
<td>This closed question format asks the respondent to choose more than one response from a range of possibilities. Unlike the multiple-choice example above, the respondent is invited to mark all the responses that are true of his or her situation.</td>
<td>a) Delivered without a schedule</td>
</tr>
<tr>
<td></td>
<td>b) Delivered without a schedule</td>
</tr>
<tr>
<td></td>
<td>c) Expensive</td>
</tr>
<tr>
<td></td>
<td>d) Correctly priced</td>
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<tr>
<td></td>
<td>e) Too low</td>
</tr>
<tr>
<td></td>
<td>f) Of low quality</td>
</tr>
<tr>
<td></td>
<td>g) Of high quality</td>
</tr>
<tr>
<td><strong>Ranking and scoring</strong></td>
<td>Please give each reason a score between 1 and 10 (with 1 being not at all important and 10 being extremely important), that reflects how important it is as an obstacle. I am unable to produce enough to make a living because:</td>
</tr>
<tr>
<td>Questions could ask respondents to rank their responses or give them a score. These types of questions are useful for learning more about the relatively importance people attach to different things. They can also reveal respondents' preferences and how they make choices. Scoring provides slightly more information than ranking, because it asks the respondent to give a precise weighting to each factor.</td>
<td>a) Water is provided without a schedule and my plants die</td>
</tr>
<tr>
<td></td>
<td>b) Water is too expensive, and I can’t afford enough</td>
</tr>
<tr>
<td></td>
<td>c) Water is of low quality and it negatively affects my crops</td>
</tr>
</tbody>
</table>
Developing indicators to measure impact

Your indicators of impact need to be SMART. That is, each indicator should be:

- **S** Specific
- **M** Measurable
- **A** Achievable
- **R** Relevant
- **T** Time bound

Measuring impact according to pre-selected indicators is an important step in any monitoring and evaluation plan.

**Specific:** An indicator should set out very clearly and specifically what outcome and ultimate impact is desired (what, who, how, when).

**Measurable:** Each indicator should have a clear item to measure (e.g., number of beneficiaries receiving improved services).

**Achievable:** There is no point in choosing an indicator for which it is highly unlikely to be achieved, so be realistic, and if you ‘over-achieve’, all the better.

**Relevant:** Indicators should be relevant to your objectives and to the outcomes you desire.

**Time bound:** The time period in which you will measure an outcome should be clear and precise.

**Learning method**

Split the participants into small groups and ask them to try and identify relevant monitoring and evaluation tools for different water stakeholder groups.
Session 11: Advocacy for reform

Learning objectives
By the end of this session, learners will:
• Understand how to set up an advocacy strategy with
  the elements: objectives, audience, message, message
  delivery, media and schedule/action plan
• Recognise and select objectives that are SMART
  (specific, measurable, achievable, relevant, time-bound)

Supporting materials
See Presentation: Session 11_Advocacy for reform

In all the material about good governance, the High-Level
and National-level public officials figure prominently
in whether governance at all levels is based on integrity
or not. It is important that these officials understand the
role they need to play in leading a culture of integrity
within their jurisdictions.

How to develop an advocacy strategy

The five components of an advocacy strategy are:

1. Objectives
2. Audiences
3. Message
4. Message Delivery
5. Schedule/Action Plan

Objectives
• An advocacy objective should set out very clearly
  and specifically what civil society wants government
to do, how it should be done, where, and when.
• The more information and evidence that one have
  about the issue, the environment/context, opportu-
nities, and the actors/decision-makers involved, the
clearer the objective is likely to be.
• Similar to setting indicators, the advocacy objectives
  should be SMART. That is, each objective should be:
  Specific, Measurable, Achievable, Relevant, Time
  bound

Specific
• Specify an action that one want government to take.
• Be as clear and specific as possible. For example, it is
too general to set as a goal: “to provide safe drinking
water for all.” Rather, set a specific goal to prioritise
the provision of safe drinking water to those who
currently have no access to safe drinking water.
• Don’t just state what the problem is (e.g. many pe-
  ople do not have access to safe drinking water). For
the objective to be specific, one must state the so-
lution that one would like to see and the specific
ministry, department, or agency within govern-
ment that needs to implement the solution. One also
need to be specific about which beneficiaries should
be targeted. For example, a more specific objective
would be: “The Department of Water Supply and Sa-
nitation must provide access to safe drinking water
to those who do not have a safe water source within
2 km of their homes.”

Measurable
• Be as exact as possible: “If you can’t measure it, you
can’t manage it!”
• Provide the numbers so that one can evaluate the
achievements at the end of the campaign.

It is not sufficient to state that the “government must
increase in the number of safe drinking water sources,”
because the increase could be very small and not what
is advocated for. The government could provide 10 ad-
ditional safe drinking water sources and still meet such
an objective.

Keep in mind that not all problems, such as discrimina-
tion against vulnerable groups, can be solved simply by
increasing service delivery.

Achievable, relevant, and time-bound
• Making the advocacy objective achievable, relevant,
  and time bound means linking it directly to the sta-
ges in the government’s planning, budgeting, and
service delivery cycles:

Consider what is possible in the current context and
what can be realistically achieved in the time.

Always set a timeframe for the objective, e.g. this finan-
cial year, over the next three years, by 2015.

Adapted from Water Integrity Network, (2009), Advocacy Guide: A Toolbox for Water Integrity Action. Retrieved February 26, 2015 from
https://waterintegritynet.files.wordpress.com/2014/10/advocacy_guide_20101.pdf
State how the government can achieve the increases or improvements in service delivery that is proposed.

- Keep in mind that not everything can be changed immediately. Existing programmes and budgets are often rigid due to political compromises and legal obligations.
- For big and long-term goals, think in terms of progressive realisation. Progressive means that if the government cannot immediately attain what one is asking for, it should at least have a medium to long-term plan for attaining it. This makes it possible to hold the government to account for following a plan on a nearby-year basis.
- For example, if the advocacy objective is - “The DWSS must construct 10,000 new taps that provide safe drinking water to those who do not have a safe water source within 2 km of their homes by 2015” - think about how this could be done over the period 2013-2015. (3,300 new taps by the end of 2013; 6,600 new taps by the end of 2014; and 10,000 new taps by the end of 2015.)
- Partners in a coalition will probably not commit to objectives that are too far out of reach.

Audience
There are two kinds of audiences: primary and secondary.

The primary audience is essentially an individual or institution that can give what is wanted in the objective, i.e., the decision maker. This is the person or institution that has the power to make the change that needs to happen.

The secondary audiences are individuals, institutions, and/or other organisations that are able to put pressure on and influence the primary audience.

Message
An effective advocacy message does the following:
- Presents a possible solution and action;
- Draws on evidence;
- Uses facts and numbers accessibly and creatively;
- Takes its secondary audiences into account;
- Knows the political environment and opportunities;
- Is simple and brief;
- Uses real life stories and quotes;
- Adapts the message to the medium; and
- Encourages the audience to take action.

Message delivery/messenger
- The messenger should be familiar with the advocacy objectives and the message.
- Even when there are different messengers, there should always be one unified message.
- Groups conducting advocacy have used legal, economic, and media experts as messengers in their campaigns. In many countries, economists carry weight on the issue of the public budget, and some groups have used them as messengers for their campaigns.
- The campaign can create and build the messengers; the more public exposure they receive, the more they will be recognised as experts and public figures.

The medium/ media
- Conducting advocacy demands reaching a diverse audience. This requires strategic thinking about how the message will be delivered. Some ways to reach a wide range of people include: print, electronic, and social media; grassroots media, such as community theatre, puppetry, visual arts, and songs; public meetings; workshops; public hearings; rallies; protests; boycotts; strikes; etc.
- The choice of media should take into consideration the experience of staff members within the organisation, the audience, the political environment, and the opportunities presented.
- Organisations conducting advocacy also need to think about public messaging versus private messaging, i.e., what to state publicly and the way that it is stated may differ from what to state privately to the advocacy target. Both public and private messaging can be done at the same time and with success. For example, a civil society organisation may criticise a development partner harshly in public and to the media, while at the same time they are holding more specific, constructive meetings in private with the donor to address the issue.

Schedule/action plan
- Advocacy action plans must not only include the communications strategy for delivering the advocacy message, but also the research & analysis and review of research that produces the evidence that supports the advocacy message. Monitoring and evaluation should also be incorporated into schedules and action plans.
- Convincing government officials and development partners of the seriousness of the work demands that research and information are produced in a credible, accessible, and timely manner.
- Use every opportunity to highlight the advocacy objective - this means the evidence must be credible, the message must be clear, and one must be ready to jump at opportunities!

Learning method
Group work – split into sector groups, pick an integrity issue that as a group you want to advocate for reform. In each group, design an advocacy campaign representing civil society and present back to the plenary how you would advocate for reform.
Session 12:
Human resource management

Learning objectives
By the end of this session, learners will:
• Understand the key elements of a strong human resource framework

Supporting materials
See presentation: Session 12_Human Resource Best Practice

In a good governance environment, it is important to incorporate integrity incentives into Human Resources policies – ask the employees what would incentivise them to work with integrity; for example, when holding regular employee evaluations, make integrity one of the criteria for public recognition, promotions, salary raises, etc.

Best practice within Human Resources includes the following:
• Job descriptions
• Clear tasks, roles and responsibilities
• Proper qualifications
• Clear performance indicators
• In interviews: adequate tests and structured interviews

In most countries this requires amending legislation.

Learning method
Group work – split into groups, and discuss ways of improving the Human Resource environment in your organisation and present back to the group how you might approach improving standards and policies.
TEACHING INTEGRITY
“How To” Guide
Effective teaching/learning methods for teaching integrity

**Rationale**
The purpose of this “how to” guide is to provide suggested learning templates, teaching methods and facilitation guides to help Water Integrity Trainers (WIT) in the region teach on water integrity.

**Learning objectives**
To assist trainers in teaching the content of this manual, to provide a holistic teaching method, and guide the learning process. This section will support the WIT to:
- Be familiar with the six teaching/training methods that are particularly effective with teaching integrity.
- Be capable of training with all six methods, with attention to thinking (cognitive), feeling (affective) and doing (behavioural) learning impact.

**Supporting materials**
**See presentation**
Pedagogical Methods & Learning Outcomes

**See presentation**
Teaching & Analysing Case Studies

For guidance on effective facilitations skills, sample exercises, how to deliver short courses and useful resources please refer to:

**See document**

**Six pedagogical methods for teaching integrity education**

**Normative:** basic concepts and information for knowledge acquisition related to rules, the laws, and standards, national, institutional, and international; e.g., what is corruption, integrity, conflict of interest, etc; what are the major laws and institutions governing these questions, etc.

**Moral:** draws on ethical and religious perspectives for developing ethical competence, but also on literature in economics and political science that focuses on the costs of corruption; e.g., why does corruption matter; why does integrity matter; who does corruption harm, etc.

**Case study:** scenarios, teaching case studies whether real or simulated, for developing analytical skills; there are 6 main types of case studies (a 2x3 matrix of cases that originate from oneself or others, that have either been solved, unsolved or failed) e.g., studying cases of successful reforms; unresolved cases; or reform failures

**Critical analysis:** questioning common assumptions for developing the ability to objectively critique taboo and accepted topics.

**Problem centred:** sharing and analysing personal or experienced problems; e.g., students and participants capturing evidence of problems in their communities or sharing unresolved problems from their personal or professional lives and then working on these in class.

**Action learning:** engaging students and teachers in experiencing corruption and integrity from assignments outside the classroom and in the community to experience integrity building; e.g. groups of students engaged in social accountability, community integrity building (CIB), trying to redress and “fix” specific problems using integrity building methods. (for example, see www.youtube.com/watch?v=YleZvel-XoA)

**Three Types of Learning: Thinking (Cognitive), Feeling (Affective) and Doing (Behavioural)**

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For more information on these three types of learning, see: www.nwlink.com/~donclark/hrd/bloom.html

Integrity Action is taking a stand that integrity education should always include learning objectives that involve ‘thinking’, ‘feeling’ and ‘doing’. This is because the impact of integrity is reaped mainly through action. Indeed, within a university it is easiest to teach on the cognitive or ‘thinking’ level, more difficult to impart learning that touches affect or ‘feeling’, and even more complex to arrange for campus- or community-based experiences with behavioural learning objectives or ‘doing’.

These three domains or levels are extremely important for educational activities and learning and are summarised related to Integrity Education as follows:

- Thinking (cognitive) domain: involves knowledge and the development of intellectual skills (Bloom, 1956). This includes the relevant laws, concepts, regulations, international and national conventions and charters, other types of factual learning by rote, direct information and knowledge acquisition, etc.
- Feeling (affective) domain: includes reactions that are emotional, such as feelings, values, appreciation, enthusiasms, motivations, and attitudes.
- Doing (behavioural) domain: includes physical movement, coordination, and use of the motor-skill areas; relates to various types of action, including the application of knowledge, implementation of skills, and types of behaviours. In some countries, the term ‘psychomotor’ domain is also used, since the mind applies what it knows to one’s motor skills, thus creating behaviour.

**Learning methods**

Review of the training methods and Group Work: Before each training workshop discuss the different perspectives of the four target groups, and determine what training methods might work best for each group to fully understand and internalise the learning about corruption and integrity. Fill out Table 2 below.

### Table 2. Training Methods Matrix

**PLANNING TRAINING AGENDAS ACCORDING TO TRAINING METHODS & LEARNING DOMAINS**

<table>
<thead>
<tr>
<th>Workshop Title:</th>
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<tr>
<th>Training Institute/Organisation</th>
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<tr>
<th>Trainer’s Name</th>
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<tr>
<th>Teaching/Training Methods</th>
<th>Thinking (Cognitive Learning)</th>
<th>Feeling (Affective Learning)</th>
<th>Doing (Behavioural/Psychomotor Learning)</th>
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<tr>
<td>Normative, Conceptual</td>
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<tr>
<td>Moral/Ethical Foundation; Social Costs of Corruption</td>
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<tr>
<td>Case Studies</td>
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<td>Critical Insights</td>
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<td>Problem-Centred</td>
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<tr>
<td>Action Learning</td>
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</table>
**Rationale:** As we have seen, corruption is a huge obstacle to social justice, human rights and development. All stakeholders must get involved and work together if we want to overcome the negative impact of corruption in societies all over the world. It means that groups that are not necessarily accustomed to working together must learn how to do so. The goal of any training workshop should be to facilitate a non-confrontation environment where learning and collaboration is encouraged.

One way of facilitating working together is to use role-play as a learning technique. That way topics or issues that lead to or prevent good governance can be presented with humour, fact and without assigning blame. The aim should always be to work with the learners to embark upon a process that will strengthen integrity and good governance in water resources management.

**Role play principles**

Plan role plays ahead of time to make the situations as realistic and relevant as possible.

Start with situations that will be relatively easy for role players to handle in order to build group confidence. Be sure, however, that before the role playing is over to have tried the most difficult situations people will be facing. After all, the point of the exercise is to make people feel ready to handle those situations.

Give each person a copy of the guidelines and review the guidelines with the group.

Decide how to use the most experienced people. If these are used in the first role play, they can provide a model for others. However, watching them first can intimidate less experienced people, who may feel, ‘You can do it because you’re experienced, but we won’t be able to measure up.’ Another strategy is to mix the veterans with less experienced people so they can help keep the role play moving successfully.

Yet another approach is to use them last to provide a positive conclusion to the session.

**Role play guidelines**

The purpose of the role play is to practice skills, not to judge the ‘performance’ of the role players.

Each person has a job to do during the role play. While some participants play the roles, the others watch and take notes. Then everyone will take part in a discussion of what was effective or what was not.

Observers should watch for and note ‘turning points’ or ‘key moments’ when the role players made choices, whether on purpose or not, that made them more effective or less effective.

Role players should stay in character throughout the role play. It’s natural to want to make comments, jokes or other asides to others in the room, but the result is to make the role play less effective. Role players should not be talking about the process by saying things like ‘Next I would say...’ or ‘I didn’t have time to make notes on this part but...’ but should just play the role the best they can as though the real event is taking place.

Observers should not interrupt the role play, but make notes of comments, and give them during the discussion period.

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36 (www.theworksite.org/index.php/training-techniques)
37 (www.theworksite.org/index.php/training-techniques)
Rationale: During national training workshops, learners will be encouraged to develop action plans that can be implemented within 12 months and bring some tangible integrity improvement to the water resources management within their country. To assist learners after the workshop, trainers will provide mentoring.

Learning objectives
The objective of this session is to help WIT to:
- To help learners develop action plans
- Help learners to ask questions of the water stakeholders to encourage them to think for themselves, analyse situations, formulate plans, etc.
- Assist learners to develop action plans that are implementable with existing resources
- Create a supportive environment, prepare for meetings, seek additional resources and further build trust between stakeholder groups
- Be empowered to work with each of the target groups

Supporting material
See presentation
Mentoring

See presentation
Developing Action Plans

See link
The following is cited and wording slightly adapted from: www.faculty.londondeanery.ac.uk/e-learning/appraisal/skilful-questioning-and-active-listening

Mentor-mentee discussion
Skilful questioning and active listening is the key to successful mentor-mentee discussions. Figure 4 gives a useful visual reference for thinking about questioning skills, usually referred to as the funnel technique starting the discussion with an open question and ending with a check that both mentor and mentee have the same understanding of what was discussed.

Mouth of the funnel
The ‘Open’ question is intended to give the mentee the widest possible scope for responding. Sometimes it may be necessary to repeat or rephrase this question to give the mentee more thinking time and further opportunities to raise information.

Narrowing body of the funnel
For narrowing the discussion the mentor can use either ‘Probing’ questions or ‘Closed’ questions or a combination of both:
1. Probing questions: aim to draw out further specific information and help complete the picture.
2. Closed questions: aim to draw out, check or confirm specific pieces of information, or to get the mentee to commit on a point more precisely.

Bottom of the funnel
By the end of the discussion it is important to do the Clarifying and Checking. These include a short summary about what both learned from the discussion, aiming to check that both have the same understanding of the main points.

The question sequence might go something like this:
- ‘Tell me how you went about…? ’ (open)
- ‘How did you prepare?’ (open – secondary)
- ‘What was your starting point?’ (probe)
- ‘So, what happened next?’ (probe)
- ‘Who else was involved?’ (probe)
- ‘And how did they respond?’ (probe)
- ‘What were your thoughts at that stage?’ (probe)
- ‘What were the main outcomes?’ (probe)
- ‘So, that took a total of six weeks?’ (closed – clarifying)

36 Mutiprofessional Faculty Development, Skilful questioning and active listening. Retrieved February 26, 2015 from www.faculty.londondeanery.ac.uk/e-learning/appraisal/skilful-questioning-and-active-listening
Figure 5. How to think about listening to stay focussed in a discussion

Listening requires effort combined with a real and honest desire to understand.

**Mentoring in management**

Increasingly organisations need to be able to continuously reinvent themselves so as to stay aligned with and responsive to their clients and other stakeholders. Creating the necessary changes can involve a wide range of programmes and initiatives such as culture change, process re-engineering, benchmarking, total quality management, values alignment, and so forth. What all these have in common is that, to be successful, they have to be accompanied by behavioural change by the organisation’s stakeholders and, in particular, by the organisation’s senior executives. Executive mentoring is an intervention designed to support such senior executives and other key staff in making the necessary behaviour changes.

This form of mentoring has as its goal increasing the ability of senior executives to achieve goals by using external mentors. The context is therefore different from counselling, where the individual’s personal needs are central, and from much internal mentoring, where the primary goal is the passing on of values, knowledge, styles and skills. Internal mentoring is well suited to developing people within the existing culture and according to existing norms. External mentoring of the kind described here is more suited to supporting the change to a new culture, helping the organisation deliver its vision, and developing levels of performance and behaviour beyond existing norms.

At the individual level, the benefits of executive mentoring vary widely depending on the particular needs, aspirations and situation of the mentee and may include the confidence not just to run with the change programme but to lead it and to champion the new culture. These benefits include:

- improved people management skills through using mentoring skills and techniques
- improved listening, challenging, and empathising skills
- the confidence to set and achieve stretching performance goals
- having someone to talk openly to
- being more ordered and reflective rather than rushing into things
- having a wider perspective on the impact of one’s management style
- being less ruled by feelings and more able to cope with difficult situations
- having the courage to be more radical and to sell one’s ideas more strongly
- opening up additional ways of thinking
- being more mindful of the need to mentor staff, understand their needs, and deal with the underlying problems, not just the symptoms.

**Learning methods**

Integrity Action will provide mentoring to the WIT through ongoing direct contact via various media (email, Skype, telephone, materials sharing, etc) with each of the 25 trainers. The WIT will in turn provide mentoring to all learners to support them in the implementation of their action plans to promote integrity.
At the organisational level, an executive mentoring programme can:

- support and accelerate personal and organisational change
- make change work by sustaining commitment to the organisation's vision in a critical mass of senior managers
- help manage the downside risk of change management and maintain performance during periods of rapid change
- improve performance by creating personal stretch goals in line with the organisation's objectives
- remove obstacles to successful change management by predicting and managing personal and organisational regression
- increase organisational awareness through providing a flow of valid operational data for senior managers
- promote balance and provide a stable base during periods of major organisational and career change.

One of the frameworks used for executive mentoring consists of four elements:

**Individuating:** This means developing autonomy, responsibility, and the ability to choose freely unconstrained by personal history. When working in this phase, the mentor's stance is nurturing and supportive and aims to help the mentee develop a strong positive self-image. The basic question which the mentee seeks to answer in this phase is “Who am I?”

**Envisioning:** This means connecting with a sense of purpose, identifying and choosing values, creating a compelling and stretching vision which is aligned to and supports the corporate vision, and committing to realising it. A key skill at this stage is the ability to create and hold a tension between the current reality and the vision. Without the ability to hold this tension, the vision merges with the current reality and merely reinforces the status quo. The mentor's role is to inspire the mentee and to help them answer the question “Where am I going?”

**Implementing:** This means identifying the goals which will lead towards the vision, deciding on the strategies and actions to achieve these goals, and then taking action. The mentor's role here is to coach and to help the mentee answer the question “How will I achieve my vision?” This may include helping the mentee improve specific management skills in areas such as communication, team leading and time management.

**Integrating:** This means getting feedback from the environment about what is being achieved and the extent to which the vision is being realised. When the mentee is able to see clearly what they are creating and to take responsibility for both their successes and failures, then there is the opportunity to learn from experience and gain insight into the changes necessary to deliver and expand the achievement of their vision. The role of the mentor is to challenge the mentee to see clearly the impact of what they are doing and to help them answer the question “Am I creating my vision?”

Underpinning the whole mentoring process are two key skills - the ability to be self-aware and the ability to exercise will. The development of these two skills provides the underlying context for the mentoring process and the degree to which the mentee enhances these two skills is one of the best indicators of the extent to which the mentoring process has created lasting changes in the mentee's effectiveness. Experience has shown that executives can readily understand this framework, that it provides a meaningful way to think of their own change process, and that it reflects their experience of the mentoring process.

Also refer to the SMART indicators and objectives, presented, respectively, in the Supporting Materials of Session 10: Monitoring and Evaluation, and Session 11: Advocacy for Reform.

**Mentoring guidance**

See document

www.faculty.londondeanery.ac.uk/e-learning/feedback/files/Mentoring_Theory_and_Practice.pdf


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Appendix 1:
Key milestones of the anti-corruption movement

1970s
• 1977 International Chamber of Commerce Recommendations to Combat Extortion and Bribery passed

1990s
• 1993 Transparency International established in Berlin
• 1995 World Bank Procurement Guidelines revised and expanded (further revisions in 1996, 1997, etc.)
• 1995 Treaty on the Protection of EU Financial Interests
• 1995 Policy Statement by International Federation of Consultant Engineers
• 1995 inaugural Corruption Perceptions Index (CPI) launched. It ranked 45 countries on their perceived level of public sector corruption.
• 1996 Rules of Conduct to Combat Extortion and Bribery adopted by International Chamber of Commerce
• 1996 Inter-American Convention Against Corruption approved by Organization of American States
• 1996 UN General Assembly Declaration Against Corruption in International Commercial Transactions
• 1997 Organization of American States Convention Against Corruption comes into effect
• 1997 EU Convention on the Fight Against Corruption Involving Officials of the European Communities
• 1997 UN General Assembly Resolution urges members to ratify international instruments against corruption
• 1997 Revised IMF guidelines adopted
• 1997 20 Guiding Principles for Fight Against Corruption adopted by Council of Europe Committee of Ministers
• 1997 OECD Anti-Bribery Convention signed
• 1997 Certification requirement introduced by North American Development Bank
• 1998 Revised Procurement Policies and Anti-Corruption Policies adopted by regional development banks (Inter-American, European, Asian, African)
• 1999 Criminal Law & Civil Law Conventions passed by the Council of Europe
• 1999 Group of States Against Corruption (GRECO) of European Council comes into effect
• 1999 OECD Convention comes into effect

2000
• 2000 Nyanga Declaration calling on Organization of African States to work on repatriation of stolen assets
• 2000 Wolfsberg Principles on Money Laundering and Corruption adopted by major private banks
• 2002 Introduction of TI Business Integrity Principles introduced and adopted by major companies
• 2002 Sarbanes Oxley
• 2003 Introduction of Judicial Integrity Standard by group of Chief Justices, endorsed by World Court
• 2003 UN Anti-Corruption Convention (signed in December 2003)
Appendix 2:
Case studies

PROGRAMME CASE STUDIES

CASE STUDY 1:
Lack of participation during dam construction

In one of the countries in the region a dam intended to function as a storage reservoir of 15 MCM water was constructed some years ago. The purpose of the dam was to store the winter rainfall to be used to extend the irrigated agriculture around the dam.

However, studies had shown that this particular area was not suitable for building the dam due to different reasons; there is saline flow existing within this area and it is also located downstream of the agriculture area. After several years from its establishment the amount of the water stored still does not exceed 15% of its capacity and the water that is stored has high salinity with negative impacts in terms of increasing the salinity of the surrounding agricultural lands. This caused the farmers to lose their lands and led them to submit a complaint against the Ministry of Water to the Ministry of Agriculture through the local municipality as the official representatives of the farmers and local community in the area.

The process of the establishment of this dam was led by the head of the Ministry of Water without any consultation with the relevant stakeholders who might be affected or impacted by this project. Furthermore, the dam was built without having an approved Environmental Impact Assessment, which is mandatory under the law by the Ministry of Environment.

According to a mid-level manager in the public sector, the Ministry of Water requested cutting down trees in order to create a path for the dam’s construction. Despite the fact that the cutting of trees would negatively impact the environment, the manager was pressured by high level politicians to approve the tree-cutting. Overall, insufficient information was shared about the project and there is still an extensive debate ongoing in this country about the project and who was responsible for its “failure”. It is unclear how decisions were taken to proceed with the project, who should be held accountable, and who the liable parties are.

Due to its high costs, more than 40,000,000 USD, the project also initiated a conflict between the Ministry of Agriculture, the Ministry of Water, the Ministry of Finance and the local municipality. The conflict was occurred due to the lack of communication and cooperation between the ministries in the planning and budgeting process.

Lesson learned
This example shows how lack of consultation, participation and lack of access to information in combination with political pressure can lead to low levels of accountability, discretion in decision making and poorly executed projects.

CASE STUDY 2:
Illegal wells threaten water resources

In a country in the MENA region, illegal wells are one of the largest sources of waste, misuse and mismanagement of water resources. When illegal wells are identified, the Ministry of Water is responsible for filing a complaint to the Ministry of Interior, after which the police is tasked with stopping its operation. The major problem lies at this stage where the police, in most cases, gets bribed or threatened. This ability to freely threaten the police stems from the strong political and/or social connections on part of the perpetrator.

The law regulating wells is very old and dates back to 1930 under the Ottoman Empire. In order to obtain a permit, there are several requirements that need to be fulfilled and cleared by the Ministry of Water. A geological study needs to be done by an expert, and the location of the well should be far from any public water source to avoid negatively influencing that source, as water is considered to be a public right. The person applying for the permit further has to prove that the government is unable to provide him/her with the required amount of water. Permits are given on condition of drilling to a maximum depths of 150 meters below ground level. However, this condition is often not respected in the area, mostly since the geology does not allow extracting enough water from the wells at the permitted depth. The wells therefore (both existing and new ones) often reach down to 300 meters and beyond, thereby breaking this regulation.
Another practice developed by citizens for bypassing the bureaucratic system is by bribing the higher level managers to directly provide them with a permit for a private well. Moreover, illegal wells are not closed down because the government knows that it cannot provide the public with enough water and has no alternative to offer them. Due to water shortage, many municipalities dig public wells in order to supply their communities with water, mostly for irrigation use. The condition of having the well far from a public source is also disregarded. In one particular case a private company was granted a permit to dig a well, but dug it right next to a public source, and due to over-pumping the neighbouring town’s water source dried out which consequently subjected the town to water shortage.

The problem also lies with the monitoring of existing wells. In one case the Ministry of Water had decided to close down one of the farmers’ well in an area, and required him to send them a picture of the closed well. Instead, a fake picture was sent to the Ministry, and the well kept on operating without further monitoring by the Ministry.

Yet another problem has to do with water quality. A recently growing prosperous business is the water tanker trucks which line up in front of private wells to pump water to deliver it to residents. This has led the Ministry of Health to conduct regular tests to monitor these tankers. Few if any of these private tankers care about the water quality licensing or even test their water.

**Lesson learned**
The case of illegal wells clearly shows the problem of political pressure, lack of monitoring and enforcement facilitated by bribery in water resources management, which leads to water shortages due to over-abstraction, depletion of groundwater resources, as well as poor water quality.

**CASE STUDY 3:**
**Corruption in public contracting**

In one of the MENA countries, the construction of a large multi-purpose water storage reservoir was initiated in 2003. However, due to irregularities during the contracting process the project was put on hold leaving the local farmers and communities with severe water shortages.

After a long planning and procurement process, the contract to construct the reservoir was awarded to a local contractor, known to have strong connections to senior officials at the Ministry of Agriculture, the contracting agency. An investigation, prompted by a complaint filed by one of the unsuccessful bidders revealed several weaknesses in the procurement process: the technical specifications in the terms of reference appears to have been designed to favour the winning bidder in question undermining real competition. The terms of reference had been drafted by a consultant with a dubious track record which should have been a warning sign. The investigation also showed that the favoured bidder received confidential information by someone at the Ministry of Agriculture before the bid submission which gave him an undue advantage over the other bidders.

How this breach of regulations could go unnoticed may be explained by the lack of competence of the members of the bid evaluation committee, several of whom had been appointed without having the necessary technical competence for the tasks.

Lessons learned: This case shows how lack of technical competence by staff, due to weaknesses in the recruitments processes can be exploited by corrupted interests during public contracting with severe negative impacts on water infrastructure projects as a result.

**CASE STUDY 4:**
**Access to information at risk**

In a country in the MENA region, the Municipal Water Board recently implemented a new scheme to provide water to the refugees of a poor area called Al-Mokhayam. However, upon commissioning, the new water system did not deliver as promised. Service was intermittent and some of the pipes were leaking.

The camp residents suspected that the contractor had used inferior materials. They therefore complained to the Board and refused to pay water fees as long as the system is not repaired. The Water Board however claimed that it was the refugees who had vandalized the system themselves and refused to repair it until they start paying the water fees. To get help, the refugees contacted a local and well respected NGO called “Water for All” supporting the right to water and sanitation for the urban poor to speak on their behalf.

Since the Water Board is a government body, and thus governed by the national Freedom of Information Law the NGO approached the Information Officer at the Board and requested copies of the project and performance contract documents and a record of the complaints submitted to the Water Board to find out if there was any truth to the claims that the reason why the water system was not functioning was that the contractor had used inferior material. However, to date the NGO has failed to get the required documents. Rumours say that this is because the Information Officer felt pressured...
not to give out the requested information, since the contractor is a wealthy friend of the Chief Engineer who is counting on him to help him get new contracts. The fact that the Information Officer depends on the Chief Engineer to keep his job, would then explain why the Information Officer has come up with excuses to why there would be an exception to the Freedom of Information law in this case.

Lesson learned
This example shows the importance of access to information and how corruption, in this case prompted by a conflict of interest situation can undermine the rule of law.

INTEGRITY ACTION CASE STUDIES

CASE STUDY 5:
Water shortages drastically reduced in Hebron, Palestine

“When we started the Hebron Municipality thought we were working against them but we told them that we have no agenda, and that we are actually working with them, towards the same goals. We just want our daily cup of water.”

Abed Almajeed Alkateebe, member of Hebron Integrity Committee for Better Services

When father-of-six Hashim Alaza talks about the water problems in the city of Hebron, Palestine, it’s easy to see why Integrity Action focused on solving problems with local services. “We’ve been suffering for years,” says Hashim. “When we have no water, we either have to borrow water from our neighbours, or we borrow money and buy bottles of water.”

Speaking about the water shortages a year ago, when Hebronites didn’t have water for 70% of the time, he said: “We used bottled water for everything: for drinking, for showering, for washing. Sometimes we couldn’t cook because there was no water. We didn’t wash our clothes for 7-10 days. Sometimes we would stop the children from drinking water.” In February 2013, residents reported that water availability was much better and that they had enough water for 80% of winter 2012. Herading these year-on-year improvements as a major step forward, the civil society activists highlighted the achievement in drawing together a Joint Working Group – called the ‘Hebron Integrity Committee for Better Services’ – so that local residents, government officials and elected members had a forum for discussing issues and working together to find solutions.

Integrity Committee member Fares Shawer, Internal Auditing Director at Hebron Municipality, says, “After Integrity Action, it became a priority for us to focus on the community’s needs regarding water, waste collection and sanitation. “We established committees and the mayor asked heads of department to be available for training workshops run by [Integrity Action partner] Aman. “Now, the water service is our top priority, and we are doing our best to deliver water, despite issues caused by the (Israeli) occupation.” Mr Shawer also referred to the committee’s work with Integrity Action partner Applied Research Institute Jerusalem (ARIJ) in organising a public meeting in November 2012 where residents could quiz the Palestinian Authority on the lack of water. “When there are public meetings, we try to attend and tell people what we are doing,” said Hebron mayor, Professor Dr Daoud Zatari. “We are under severe pressure to deliver on this.”

However, the true test of the water improvements will come in summer 2013, when temperatures soar. “When we are working, we need to take a shower, but sometimes we can be a week without a shower,” said Hashim. “There are many people here without jobs and they can’t buy in water. What will they do?” Prof Dr Zatari said that the Water Authority had agreed to deliver 50 per cent more cubic metres each day by May, with promises to fully meet the needs of the city by 2014. “But whatever I say to people, they won’t trust us until they have water,” he concluded.

CASE STUDY 6:
Jericho, Palestine, water campaign stops residents from sabotaging their neighbours’ water supply

“Before Integrity Action, residents were complaining individually about the lack of water. But now there are a lot of us who are speaking collectively to the Municipality about the same thing, so we get our voices heard.”

Hisham Balou, member of Integrity Committee for Better Services (Jericho)

When tensions reached boiling point about problems with the summer water supply in Jericho, residents took matters in their own hands. According to civil society activists, residents regularly sabotaged their neighbour’s water supply because it was the only way to get enough water pressure to fill their tanks.

Hisham Balou, a civil society monitor with Integrity Action, said that Jericho residents – who are predominantly farmers – felt the council was ignoring their
needs. The local people were accusing the Municipality of wrongly prioritising water supply to the tourist hotels, the security forces training centres and wealthy people from other cities in the West Bank with second homes in Jericho who needed to fill their pools.

But Hisham said water supply had improved by around 25% in 2012, compared to 2011 – so there was now only inadequate water supply for just over 50% of the time. And he attributed this to the concerted efforts of the monitors, council employees and elected members who had come together as part of Integrity Action’s initiative to form a joint working group.

In 2011 and 2012, the joint working group – which is called the Integrity Committee for Better Services (Je-

richo) – held around 50 public meetings, and arranged five face-to-face meetings with the mayor. The Integrity Committee also held a public demonstration that was attended by around 150 residents.

Hisham says, ‘[Using public meetings] is a slower way to get things done, but it’s a better way. If I cut the water off by using magnets or by running my own pipes in front of my neighbour’s, I am doing an injustice to my neighbour, and it’s illegal. ‘Things are a lot better since we have brought the residents together. We can see that it’s better for us, as a group, to channel our concerns to the right people.’

Fellow Integrity Community volunteer, Nidal Hassan Jalayta, agreed, saying, ‘We built citizenship around people’s rights and responsibilities. No-one would dare to cut their neighbour’s water supply now. And because these acts of sabotage have stopped, it means that more people are now getting the water they need.’ Last summer the Municipality announced its water schedules for the first time ever, so different neighbourhoods knew whether they would get water from 6am to midnight, or midnight to 6pm or 6pm to midnight. The civil society monitors ensured that the Municipality stuck to these shifts – and that certain neighbourhoods weren’t able to lobby the council for the water to move across to their area before the allotted time. Monitors say that they will continue to work with the Municipality to make sure water supply improves further, and that action is taken to improve water quality as well.

**CASE STUDY 7:**

**Tax collection campaign leads to 50% more street cleaners in Nablus, Palestine**

“In the past we (municipality employees) weren’t open to the community. Now, we listen to the people. Local monitors told us that rubbish collection was the biggest problem in Nablus. We did not have the resources to improve the service. Together we ran a campaign to improve the collection of local taxes, and now we have more money to improve the rubbish collection.”

Sameh H. Assali, Director of the One Stop Shop, Nablus Municipality

Residents and traders have praised Nablus Municipality for making the city a better place to live and work in. Local people say the city centre and outlying residential areas are now much cleaner than they were in 2011 and before. City centre trader Alhaj Salim Abu Zaint said, “(Currently) the workers are doing a really good job. It’s a big improvement on previous years.” Mother-of-four Fadwa Maymash said there had been noticeable changes in her hillside neighbourhood of Middle Blay-
bous. “The streets are much cleaner than a year ago. The rubbish container is emptied regularly.”

Civil society activists attribute the improvements to a successful partnership that they have forged with council officers and elected members. Through Integrity Action, a joint working group of civil society representatives and Municipality employees was created in Nab-
lus in 2009. As its first activity, the monitoring group, known as the Integrity Committee for Better Services, completed their first citizen report card by going out to residents and asking them to score their local services. Rubbish collection was highlighted as the worst service. But the council told monitors that their hands were tied, because 20% of the population weren’t paying their taxes. So, in early 2011, the Joint Working Group agreed to run a tax collection campaign to try to solve the funding shortfall.

Integrity Committee member, Bilal Salameh, said, ‘We raised awareness among people that they needed to support the Municipality in order for the Municipality to be able to support them. People have rights, but they also have responsibilities.’ Billboards, radio adverts and flyers were used to explain why all residents needed to pay for their rubbish collection. As a result, the income from taxes tripled to 6 million shekels – as 100% of residents now pay what they owe.

The Municipality has used the extra funds to increase the number of street cleaners from 110 to 170. It’s purchased smaller rubbish trucks to access the steep hillside communities. And cleaners have received more training. “Before, we would assume what people wanted. Now, we know better, and we ask people to tell us what they want. “If you walk around, you can see the difference everywhere” said Bilal.

This project was part of Integrity Action’s Pro-Poor Integrity (PPI) Program, which was funded by UKaid from the Department for International Development.
CASE STUDY 8: Improved waste management in Naryn, Kyrgyzstan

“We can see the benefit of working together. Sometimes no resources are needed, just joint planning”.

Nurbek Moldokadyrov, Vice Mayor of Naryn

Waste management services in Naryn, Kyrgyzstan have vastly improved thanks to the work of Integrity Action’s partner Mountain Societies Development Support Programme (MSDSP). Since 2009 MSDSP has been working effectively with the local municipality and others in Naryn, to radically improve waste collection in the city. With support Integrity Action, MSDSP used citizen report cards to conduct a review of municipal services in Naryn. They discovered considerable public dissatisfaction with the services provided by Clean Naryn, the municipal body responsible for waste disposal.

Garbage trucks had been using outdated maps, which did not include several areas of the city, and were also following an irregular schedule. As a result, rubbish was often left in the streets for days before it was disposed of properly by the municipality, whilst some places had no designated areas for gathering waste at all.

Through the Naryn Coordination Council (a Joint Working Group established by MSDSP in 2010), local government officials, elected members, residents and local organisations got together to address the waste management issues.

In 2011, the Mayor’s Office, city council, the architectural office and the community monitors created a rubbish collection schedule and a new map for the garbage trucks, which included the previously neglected areas. The Joint Working Group also developed a media and billboard campaign to raise awareness about the need to pay rates, which led to a massive increase in billing. The additional income has been used to pay for much-needed bins and trucks.

Results have been extremely impressive. Tax collection rates for the municipality increased from 118,000 Kyrgyzstani Som in 2008 (£1,600) to 1.9 million Som today (£26,000), due to the campaign. Garbage trucks used to gather waste from 126 collection points, now they collect rubbish from 278 points around the city on the same two days each week. There are also twice as many garbage trucks as before. Residents can access this information through large maps that are displayed in the supplier’s offices.

“The community is now a lot cleaner, and that is all down to the improvement in rate paying which only came about because of the Joint Working Group” says Bilimbek Jakiev, director of Clean Naryn.

Ongoing interaction between residents and local councillors is continuing through the use of community radio. Radio station ‘Almaz’ has agreed to host a weekly 15-minute phone-in programme where residents can put their questions about local services – and highlight any issues they are experiencing – to representatives from the Mayor’s Office, local government, community monitoring CBOs, and service providers.

CASE STUDY 9: Integrity drive in Kyrgyzstan leads to cleaner city

“Since we started working under with Integrity Action, we have achieved results. I can’t say that I have eliminated all the corruption, but I have reduced it by 80 per cent.”

Olzhoev Zilalidin, Director of Rubbish Collection, Batken Municipal Services

When Integrity Action began work in Kyrgyzstan in 2009, the rubbish collection service in the city of Batken was dismally poor. Council officials blamed a lack of investment on high unemployment rates, saying that money generated through local taxes was almost non-existent. But the problems went much deeper. Residents who could afford to pay rates were refusing to pay because they were suspicious that their taxes would never get beyond the pockets of the directors. And with good reason.

With assistance from Integrity Action, the Insan Leilek Public Foundation recruited 15 volunteers to become community monitors. They learnt how to gather evidence of sub-standard service delivery, and how to speak out and hold their local government to account. Insan Leilek also established a Joint Working Group to enable local government officers, elected members, residents, monitors and CBOs to meet regularly to discuss issues and identify appropriate solutions.

In April 2012, community monitors conducted a social audit relating to 30 indicators around standards of service provision, transparency, accountability, local participation and ethics. They then presented their findings at a Joint Working Group meeting – highlighting that the town was full of rubbish, there was uncontrolled fly-tipping taking place, people were burning rubbish, and there was entrenched institutional corruption within the service provider.

The city council agreed to appoint a new director of the rubbish collection service. The current director was sacked – for corruption, and also for failing to do his job. His successor, Olzhoev Zilalidin, says, ‘Since I was ap-
pointed as director last April, many things have changed. I can’t say that I have eliminated all the corruption, but I have reduced it by 80 per cent. ‘There was no money in the service, or machinery or garbage collectors. We had three garbage trucks, but only one was in operation because the fuel to run the other two trucks was being sold off. Only nine people were employed as rubbish collectors. Now, we have a staff of 22.’

Since the Joint Working Group’s demands for more transparency and accountability in the rubbish collection service, a schedule has been published to show on which two days each district and downtown area will have rubbish collected. Contracts have also been put in place so residents know that the tariff for rubbish collection. The aim is to improve rate collection beyond the current 40 per cent rate achieved.

Olzhoev continues, ‘For future improvements, we plan to put big rubbish containers in the streets so people develop the habit of taking their rubbish away from their homes. We also want to increase the rubbish collections to three times per week. We plan to do this by June 2013.’

CASE STUDY 10: Council services improve as thousands of residents start paying taxes

“We have been true to our word and we have provided the lighting that we promised. We have stood shoulder to shoulder with our community and we are now building success for the future. I hope the trust will be more and more in the future.”

Muhammed Shaheen, executive director of Al-Ram municipality

New street lighting has been installed on one of Palestine’s accident hotspots after a civil society campaign encouraged 20% more residents to pay their taxes.

As part of the five-year Pro-Poor Integrity (PPI) programme between 2008 and 2013, Integrity Action partner Applied Research Institute Jerusalem (ARIJ) supported the establishment of a joint working group in Al-Ram – made up of local council elected members and employees and civil society activists.

Time and again, the civil society volunteers within the group would lobby for better local services – but the Municipality would explain that they weren’t receiving enough local rates to fund improvements.

The joint working group agreed to run a six-week rate collection campaign to tackle the lack of revenue.

For three months leading up to the campaign in 2011, the group met to plan the strategy, and agree the messages and slogans that would be used on billboards, flyers, and in radio broadcasts. The campaign also included a series of public meetings, and the Municipality wrote to invite everyone in the community to take active part in the process.

Before the campaign, only 18% of residents were paying their taxes for rubbish collection. Afterwards, that increased to 22% of residents – swelling the Municipality coffers by 200,000 shekels (£34,000 approx).

The Municipality’s executive director Muhammed Shaheen said that the audited accounts for 2012 would be displayed publicly within the council offices, showing that the additional income had been allocated to the long-awaited street lighting programme.

“We made a promise 10 years ago that we would install street lighting on the main road in Al-Ram. At night, the road was very dangerous. People couldn’t see anything, and, in winter, there were lots of accidents,” he said.

“Now, residents have street lights, and the area has been paved. And we can prove that this came about because of the tax collection campaign. In the past, we didn’t tell people our budget, but now, they can see how we spend every penny.”

When Muhammed Shaheen joined the Municipality seven years ago, local government was carried out behind closed doors.

But, since the PPI programme mobilised ARIJ to set up the joint working group, the residents of Al-Ram are much closer to local government affairs.

“We were far away from the community,” adds Muhammed. “We thought that citizens shouldn’t be involved. Now, through public meetings and going out onto the streets, we are building trust.”

Reflecting on how the Municipality is well positioned for further collaboration with local residents and civil society activists, Muhammed mused: “We have been true to our word and we have provided the lighting that we promised. We have stood shoulder to shoulder with our community and we are now building success for the future. I hope the trust will be more and more in the future.

Newly-elected mayor Ali Maslamany built on this, saying: “The principles of transparency and accountability are very important. This is the right time for us to cooperate with the social society and the citizens. We need to raise awareness. We need to change the reality in Al-Ram.”
The Applied Research Institute Jerusalem (ARIJ) is part of the Integrity Action Pro-Poor-Integrity Programme (PPI), which is funded by UKaid from the Department for International Development. PPI aims to increase capability, responsiveness and accountability of local civil society and key local state institutions-responsible for health, sanitation and social protection in Palestine.

Integrity Action, a UK registered international NGO, is one of the leaders in the field of promoting transparency, accountability, and integrity building in developing and transition countries. It works in partnership with local civil society organisations www.integrityaction.org
### Appendix 3:
Glossary of terms in relation to integrity and public administration

<table>
<thead>
<tr>
<th>TERM</th>
<th>DEFINITION</th>
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<tbody>
<tr>
<td>Abuse (v)</td>
<td>To put to a use other than the one intended</td>
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<tr>
<td>Abuse (n)</td>
<td>Improper use or treatment of an entity or person, often to unfairly or improperly gain benefit</td>
</tr>
<tr>
<td>Abuse of function</td>
<td>Failure to perform or a performance of a function by an agent (public officer, private agent) often aimed at receiving an undue advantage</td>
</tr>
<tr>
<td>Abuse of power (n)</td>
<td>The commission of an unlawful act, done in an official capacity, which affects the proper performance of official duties</td>
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<tr>
<td>Access to Information</td>
<td>The ability of citizens easily and legitimately to get access to information stored by others (especially government), when there is no specific prohibition in law preventing such access.</td>
</tr>
<tr>
<td>Access to information law (or freedom of information law)</td>
<td>Laws, increasingly passed in countries of the world (over 150 to date), which allow a citizen of that country to obtain information held by government bodies (and sometimes by private bodies - e.g., privatised government bodies) and provide the structures and systems by which this can happen as well as providing the exceptions to this law (e.g. information on national defence, or commercial transactions). Access to information laws (also called in some countries, Freedom of Information Laws) are increasingly recognised as a pre-requisite for transparency and accountability of governments and as a safeguard for citizens against mismanagement and corruption of governments.</td>
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**TERM**

**Accountability**

One of the main elements of Integrity: Enabling stakeholders to check that you do what you say you do or are supposed to do.

The state of being accountable, liable, or answerable; considered a requirement for public officials, for officers and directors of companies, for managers and employees. For example, public officials, managers and other professionals are accountable to shareholders, clients, customers, patients, the general public, etc.

We can distinguish between Horizontal, Vertical and Diagonal accountability

- **Horizontal accountability** consists of formal relationships within the state itself, whereby one state actor has the formal authority to demand explanations or impose penalties on another. Its focus is on internal checks and oversight processes. For example, executive agencies must explain their decisions to legislatures, and can in some cases be overruled or sanctioned for procedural violations.

- **Vertical** forms of accountability are those in which citizens and their associations play direct roles in holding the powerful to account. Elections are the formal institutional channel of vertical accountability. But there are also informal processes through which citizens organise themselves into associations capable of lobbying governments and private service providers, demanding explanations and threatening less formal sanctions like negative publicity.

- **Diagonal accountability** operates in a domain between the vertical and horizontal dimensions. It refers to the phenomenon of direct citizen engagement with horizontal accountability institutions when provoking better oversight of state actions. Citizens bypass cumbersome or compromised formal accountability systems to engage in policy-making, budgeting, expenditure tracking and other similar activities. Diagonal accountability (also see social accountability) has been the locus of many innovations, especially in the last 20 years.

All three kinds of accountability are essential to making a National Integrity System function properly – at least in an open democratic society. In fact, the test of the openness of a society is partly how well these three forms of accountability operate.

**Action learning**

Action learning is an educational process whereby people work and learn together by tackling real issues and reflecting on their actions. Learners acquire knowledge through actual actions and practice rather than through traditional instruction.

Action learning goes beyond the problem centred learning approach. It involves testing first principles in real-life situations outside the classroom to see whether they deliver satisfactory results, and re-assessing the principles in the light of the results. Action learning often requires the use of tools and approaches that close the loop.
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<th>TERM</th>
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<tr>
<td>Activist</td>
<td>Someone who is seriously and passionately involved in and/or advocating for a particular cause (often social or political) by mobilising support for issues, participating in campaigns, running for public office, etc.</td>
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<tr>
<td>Administrative accountability</td>
<td>(UNDP) That aspect of administrative responsibility by which officials are held answerable for general notions of democracy and morality as well as for specific legal mandates</td>
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<tr>
<td>Administrative corruption</td>
<td>(World Bank): The intentional imposition of distortions in the implementation of existing laws, rules and regulations to provide advantages to either state or non-state actors as a result of illegal transfers or redirection of private funds to public officials</td>
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<tr>
<td>Administrative due process</td>
<td>(UNDP) Term encompassing a number of points in administrative law that require that the administrative procedures of government agencies and regulatory commissions, as they affect private parties be based upon written guidelines that safeguard individual rights and protect against the arbitrary or inequitable exercise of government authority</td>
</tr>
<tr>
<td>Affective learning</td>
<td>Where the learner interacts with someone who has directly suffered from corruption or maladministration and understands with feeling and/or emotion what that has meant in their lives, or learns something from a story, situation or material (in any media) that generates an emotional response.</td>
</tr>
<tr>
<td>Alignment</td>
<td>Alignment denotes consistency between what an organisation intends and/or says it is going to do and what it actually does. It also denotes consistency between the behaviours that an organisation considers to be important and the way it actually behaves. It can be described as “organisational wholeness&quot;, in the sense of an organisation’s collective focus on a common purpose: the constituent parts of your organisation “line up” as a whole, focused on its goals. Management and staff demonstrate behaviour that encourages the organisation to flourish. It therefore also denotes the extent to which your organisation synchronises its activities, so that its various constituent elements present a common, seamless front to others and work together to implement its strategy and achieve its purpose.</td>
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<tr>
<td>Anti-corruption agency</td>
<td>A special agency (usually governmental) that focuses on fighting corruption – often part of the police or law enforcement bodies in general, but can be independent.</td>
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<tr>
<td>Apolitical</td>
<td>(UNDP) 1. Outside of politics; not concerned with political dominance; apathetic toward voting or politics; 2. Non-partisan; not affiliated with a political party</td>
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<tr>
<td>Best practice</td>
<td>A technique or methodology that, through experience, research and reflection, has reliably led to a desired or optimum result.</td>
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<tr>
<td>Black list (n)</td>
<td>A list of organisations (often suppliers of goods and services) that have been noted as having behaved without integrity in the past, and thus should not be allowed to provide goods and services in the future. (to blacklist (v) – to put organisations on such a list). See also White List.</td>
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<tr>
<td>Bottom-up approach</td>
<td>The engagement of people in a society to lead reform and change, often – but not always – in collaboration with government. A leadership style of an organisation where employees are motivated to participate in the process of decision making and organisational life in general.</td>
</tr>
<tr>
<td>Bribery</td>
<td>The act of offering, agreeing to, giving or receiving an undue advantage - tangible (e.g., money) and/or intangible (e.g., service) - in exchange for performing or abstaining to perform an official action or with an intention to influence a person of authority in the discharge of his/her functions.</td>
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<tr>
<td>Case story</td>
<td>A story – demonstrating a success or failure - illustrating a topic that concerns a student or learner, which describes what took place, and allows students to reflect and analyse the different steps taken, and the different results obtained. Typically students are asked to relive the story presented, stop it at different points, and are asked to reflect and answer questions.</td>
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<tr>
<td>Case study</td>
<td>A case study for teaching relays a real or fictitious story about an organisation or person, the study of which provides various opportunities for developing analytical skills and learning. The story often leads up to a decision-point or crisis situation that requires the students to formulate a decision, solution or plan of action.</td>
</tr>
<tr>
<td>Checks and balances</td>
<td>Rules and processes that enable an appropriate system and environment so that no one person or unit is solely in charge of any business unit, and that each person or unit has someone else to check on each facet for accuracy, legality etc.</td>
</tr>
<tr>
<td>Citizen monitoring with an</td>
<td>Operations whereby citizens are identified through participatory processes to engage communities and collect data on the accountability, transparency, and effectiveness of development projects in their communities. See Integrity Approach, and see Compliance Approach.</td>
</tr>
<tr>
<td>integrity approach</td>
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<tr>
<td>Citizen participation</td>
<td>(UNDP) The involvement of citizens in a wide range of administrative policy-making activities, including the determination of levels of service, budget priorities, and the acceptability of physical construction projects, in order to orient government programs towards community needs, build public support and encourage a sense of cohesiveness within neighbourhoods and societies.</td>
</tr>
<tr>
<td>Clientelism</td>
<td>Distribution of selected goods and services in exchange for political loyalty and support from constituents or clients.</td>
</tr>
<tr>
<td>Closing the loop</td>
<td>The last stage in Community Integrity Building, after the advocacy is undertaken and problems are fixed or not, whereby feedback is reported to stakeholders, triggering learning and impact assessment, and further plans are developed to resolve the problem as needed.</td>
</tr>
<tr>
<td>Code of conduct</td>
<td>A set of rules outlining the responsibilities of or proper practices for an individual, party or organisation.</td>
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<tr>
<td><strong>TERM</strong></td>
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<tr>
<td><strong>Code of ethics</strong></td>
<td>A central guide and reference for staff to support day-to-day decision-making based on ethical principles. It is meant to clarify your organisation’s vision, mission, values and principles, linking them to standards of professional conduct. It should provide clear guidance on norms of expected individual behaviour and how your organisation operates.</td>
</tr>
<tr>
<td><strong>Cognitive learning</strong></td>
<td>Learning that is based on information and knowledge acquisition and thinking; related to corruption and integrity it often includes learning about international and local laws and regulations, history, social attitudes and culture.</td>
</tr>
<tr>
<td><strong>Collective action</strong></td>
<td>A common initiative of different sectors or multiple actors from the same sector, that aims to unite efforts in advocating for laws, policies, etc. or to agree on procedures (see Integrity Pact)</td>
</tr>
<tr>
<td><strong>Community integrity building</strong></td>
<td>A process by which communities, often led by CSOs, that have issues or problems with local government and/or its delivery of services, work to get them fixed, preferably, but not always, in a collaborative process with local government. The Community Integrity Building (CIB) process starts with scoping the environment, then conducts joint learning between local government and citizens to function as monitors, gathers evidence, engages citizens and implementers – business or service deliverers - and closes the loop by providing feedback to stakeholders. The processes, tools and mechanisms of CIB are a sub-set of social accountability (see Social Accountability), but emphasise the resolution of problems and “closing the loop” to the satisfaction of stakeholders. (see Fix-Rate and Integrity Approach)</td>
</tr>
<tr>
<td><strong>Competence</strong></td>
<td>One of the main elements of Integrity: Competence denotes an organisation’s ability to meet performance objectives and satisfy the reasonable quality expectations of its internal and external stakeholders. This means having its employees effectively deploying the skills and capabilities required to achieve its goals. It conveys a sense of reliability and addresses the “fit” between how your organisation carries on its affairs and what the needs of its stakeholders are. As such, it demonstrates your organisation being “fit for purpose” in the environment in which it operates. It requires a balanced mix of managerial and technical skills and attributes.</td>
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<tr>
<td><strong>Competitive differentiator</strong></td>
<td>An organisation which tries to position itself competitively by setting its products, services and brands apart from those of its competitors.</td>
</tr>
<tr>
<td><strong>Compliance</strong></td>
<td>Meeting laws, regulations, recommendations, internal policies, procedures and contracts</td>
</tr>
</tbody>
</table>
| **Compliance approach**  |  • A Compliance Approach to reducing corruption and/or solving integrity or ethical challenges is characterised by being:  
  • Rules-based  
  • Focused mainly on the application and enforcement of rules and procedures  
  • Adversarial: naming, shaming, litigation  
  • Problem-focused  
  
  A compliance approach can be led either top-down or bottom-up.                                                                                                                |
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<tr>
<td>Conflict of interest</td>
<td>A conflict between the private interests and the official responsibility of a person in a position of trust. If a person in a position of power in an organisation uses that power to promote a relative or friend so that they gain some advantage, this illustrates conflict of interest. If the same person simply puts the person’s name forward to be handled through existing and legal processes, it is not conflict of interest.</td>
</tr>
<tr>
<td>Constituency</td>
<td>(UNDP) A group of organisations or persons interested in the work and actions of a given official, agency or organisation, and a potential source of support for it</td>
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<tr>
<td>Constructive engagement</td>
<td>A stage in the process of Community Integrity Building characterised by sharing findings, identifying solutions and advocating for change</td>
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<tr>
<td>Context sensitivity</td>
<td>The first stage in the process of Community Integrity Building characterised by learning about the context and the stakeholders. This involves stakeholder analysis, community participation and establishing a baseline of information.</td>
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<tr>
<td>Corporate social responsi -</td>
<td>A company’s obligation to be accountable to all of its stakeholders in all its operation and activities, with the aim of achieving sustainable development not only in the economic, but also in the social and environmental dimensions</td>
</tr>
<tr>
<td>Corruption</td>
<td>The abuse of entrusted or public power for private or personal gains</td>
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<td></td>
<td>A situation where a monopoly exists, where the principal has high discretion and behaves without accountability.</td>
</tr>
<tr>
<td></td>
<td>An act done with the intent to give an advantage inconsistent with official duty and the rights of others. It includes bribery, coercion and extortion, among other acts.</td>
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<tr>
<td>Corruption controls</td>
<td>The enforced laws, regulations, mechanisms and procedures that make corruption difficult within an organisation.</td>
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<tr>
<td>Corruption perception index</td>
<td>An index of scores of (currently) 177 countries, which measure the perceived levels of public sector corruption. It is carried out by Transparency International (TI), published every year, and is based on perceptions of informed people and other indices identified by TI</td>
</tr>
<tr>
<td>Critical insights</td>
<td>Critical insights question some of the widely accepted principles and assumptions in any given field based on empirical evidence. Can corruption be eliminated? What does a zero tolerance policy mean in practice? Why is corruption so difficult to curb? What are its functions? Are there positive aspects of corruption? Why do so many reforms fail? Why do some countries seem to be able to combine high rates of growth with corruption?</td>
</tr>
<tr>
<td>Cronyism</td>
<td>Giving an unfair advantage to long-standing friends, especially by appointing them to positions of authority, regardless of their qualifications. Hence, cronyism is contrary in practice and principle to meritocracy.</td>
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<td>TERM</td>
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<tr>
<td><strong>Decentralisation</strong></td>
<td>(World Bank) The transfer of authority and responsibility for public functions from the central government to subordinate government or quasi-independent government organisations or the private sector. This covers a broad range of concepts relating to the type of decentralisation – political, administrative, fiscal or market</td>
</tr>
<tr>
<td><strong>Decision tree</strong></td>
<td>(UNDP) An analytical technique that identifies various possible outcomes, alongside the risks associated with each</td>
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<tr>
<td><strong>Delegation</strong></td>
<td>(UNDP) Assigning tasks to others</td>
</tr>
<tr>
<td><strong>Democracy</strong></td>
<td>(UNDP) A political system in which decision-making power is widely shared among members of the society</td>
</tr>
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</table>
| **Democratic elections**  | A process whereby those who have registered as electors in a country are given the opportunity to vote for people of their choice to represent them in the Parliament of their country at regular intervals, as set in law. There are many ways in which elections are subverted, but they become democratic when the following aspects are observed:  
  • Acceptance of the Outcome by the winners and losers  
  • Impartiality and fairness in the process of holding the elections  
  • The elections are Non-violent and free from threats  
  • Participation by a majority of the citizens of the country  
  • Professionalism by those who manage the elections in setting up election booths, collecting votes cast, etc.  
  • Openness in the declaration of the results of the voting  
  • Regularity in keeping to the legal intervals for holding the elections  
  • Rule of law is followed in the nominations of candidates, the limits to expenditure on elections, etc.  
  • Timeliness in holding the elections at the legal intervals  
  • Transparency in clearly counting votes, declaring results, and publicising those results |
<p>| <strong>Devolution</strong>            | (World Bank) The transfer of authority for decision making, finance, and management to local government. Devolution usually transfers responsibilities for services to municipalities that elect their own mayors and councils, raise their own revenues, and have independent authority to make investment decisions. In a devolved system, local governments have clear and legally recognised geographical boundaries over which they exercise authority, and within which they perform public functions. It is this type of administrative decentralisation that underlies most political decentralisation |
| <strong>Diagonal accountability</strong>| A mechanism or approach from society that triggers a horizontal accountability mechanism (see Accountability)                                    |
| <strong>Disclosure</strong>            | The release of relevant information; the act or instance of disclosing to a third party or the public                                           |
| <strong>Double dipping</strong>        | A phrase referring to the practice of receiving two sources of funds where one is redundant for the specific activity or use, or two grants for the same activity in a project |</p>
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<tr>
<th>TERM</th>
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<tbody>
<tr>
<td>Due diligence</td>
<td>Full compliance with rules and procedures that a person exercises in carrying out a process.</td>
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<td></td>
<td>An investigation, research, or analysis of an organisation or individual prior to entering into a contract, transaction or business activity with another party</td>
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<tr>
<td>Duty</td>
<td>An obligation assumed by contract, or imposed by law or based on ethical standards to conduct oneself in conformance with a certain standard or to act in a certain way</td>
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<tr>
<td>E-government</td>
<td>E-government (short for electronic government, also known as e-gov, Internet government, digital government, online government, or connected government) consists of government communications being handled digitally i.e. digital interactions between a government and citizens, government and employees, and also between government and governments/agencies</td>
</tr>
<tr>
<td>Embezzlement</td>
<td>The wrongful diversion of goods to one’s own use, or fraudulent appropriation of property</td>
</tr>
<tr>
<td>Equality</td>
<td>The state of being equal, especially in status, rights, or opportunities</td>
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<tr>
<td>Ethical behaviour</td>
<td>Ethical behaviour denotes an organisation’s conformity with the set or system of principles and commitments that are established to inform its decision-making and behaviour. Such behaviour is based on a consciousness of what is legally, morally – and professionally - important, obligatory or permissible. If an organisation behaves ethically, it does not abuse its position and behaves fairly and equitably towards others. Its decisions are implemented with care, reflection and consistency.</td>
</tr>
<tr>
<td>Ethical competence</td>
<td>The glue that holds an ethics regime together. It is composed of 3 things: (a) The ability to identify and name integrity or (public sector) ethics problems; (b) knowledge of the legislation, code and standards to which these breaches apply; (c) ability to propose solutions and a way of redressing these problems.</td>
</tr>
<tr>
<td>Ethical competence</td>
<td>Ethical competence can be tested. It is far more difficult to test whether a person is ethical.</td>
</tr>
<tr>
<td>Ethics</td>
<td>One of the main elements of Integrity: Acting with honour and public purpose.</td>
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<tr>
<td>Ethics regime</td>
<td>Ethics prescribe specific guidance on behaviours that should or shouldn’t be practised as a matter of personal, professional or organisational obligation.</td>
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<tr>
<td>Evaluation</td>
<td>Composed of 3 things (a) a clear statement of an organisation’s mission, code of conduct and values, (b) leadership that ‘walks the walk’ and ‘talks the talk’, meaning that the leader behaves according to the ethics messages he/she disseminates, and (c) a credible grievance mechanism to deal with complaints</td>
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<tr>
<td>Evaluation</td>
<td>Evaluations are thorough investigations into the difference between planned and actual results and the reasons for these differences</td>
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<tr>
<td>Evidence base</td>
<td>The third stage in the process of Community Integrity Building, characterised by data collection, analysis and verification</td>
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<tr>
<td>Executive order</td>
<td>(UNDP) A presidential mandate directed to and governing, with the effect of law, the actions of government officials and agencies</td>
</tr>
<tr>
<td>Extortion</td>
<td>Officials unlawfully taking money or things of value from other persons, or extracting something by force</td>
</tr>
<tr>
<td>Externalities</td>
<td>The costs and benefits which are not included in the pricing mechanism. The negative externalities are the reason that we are concerned with corruption, while the positive externalities may benefit certain people, but usually not in an egalitarian way.</td>
</tr>
<tr>
<td>Facilitation payments/grease payments</td>
<td>A payment made to a government official or other person of authority to speed up the performance of his/her routine functions to the payer’s advantage</td>
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<tr>
<td>Favouritism</td>
<td>An act of showing or giving an unfair preference of favour</td>
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<tr>
<td>Fiduciary responsibility</td>
<td>A fiduciary has an obligation to act primarily for the client’s benefit in matters connected with the undertaking, and not for the fiduciary’s own personal interest. The fiduciary duty of directors includes, amongst other items, the duty of care, the duty of loyalty, the duty of candour and good faith</td>
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<tr>
<td>Fix</td>
<td>The resolution of a problem to the satisfaction of the main stakeholders. In the integrity field we are primarily interested in problems that are resolved through the use of transparency, accountability, integrity, etc. The focus is on Outcomes and Impact of better services and quality of life, rather than outputs.</td>
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<tr>
<td>Fix-rate</td>
<td>Within the Community Integrity Building cycle, the fix-rate is the percentage of the problems identified that is resolved.</td>
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<tr>
<td>Franchising</td>
<td>(World Bank) A form of contracting out whereby government confers the right or privilege to a private concern to conduct a business or sell a product or service in a specific geographic area according to prescribed terms and conditions</td>
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<tr>
<td>Fraud</td>
<td>Criminal deception, false representation or omission of information to obtain an unfair advantage</td>
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<tr>
<td>Free riders</td>
<td>Individuals in a group who let others do the work while they themselves also reap the benefits</td>
</tr>
<tr>
<td>Functional analysis</td>
<td>Functions connect the causes and the consequences of corruption. They are not a moral judgment on the costs and benefits of corruption but they help to explain (a) partly why corruption endures and (b) they shed light on the extent to which reforms provide viable alternatives. To be successful, reforms must provide viable alternatives to at least some of the most important functions of corruption.</td>
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<tr>
<td>Gender equality</td>
<td>Gender equality, also known as sex equality, sexual equality or equality of the genders, refers to the view that men and women should receive equal treatment, and should not be discriminated against based on gender, unless there is a sound biological reason for different treatment</td>
</tr>
<tr>
<td>Ghost worker</td>
<td>A person on an organisation’s payroll who doesn’t actually work in the organisation.</td>
</tr>
<tr>
<td>Governance</td>
<td>Governance denotes the collective means by which direction, oversight and control are exercised over an organisation’s activities and conduct. This includes the mechanisms and processes by which decisions about the allocation, use and disposition of assets are made, executed and accounted for.</td>
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<tr>
<td>Graft</td>
<td>The term means making illegal profit, or denotes the dishonest funds themselves.</td>
</tr>
<tr>
<td>Hierarchy</td>
<td>(UNDP) A characteristic of the structure of formal bureaucratic organisations (such as government or other bureaucracies); a clear vertical “chain of command” in which each unit is subordinate to the one above it and superior to the one below it</td>
</tr>
<tr>
<td>Human rights</td>
<td>Human rights are moral principles that set out certain standards of human behaviour, and are regularly protected as legal rights in national and international law. The entitlement to human rights is fundamental to all human beings, both as universal (applicable everywhere) and egalitarian (the same for everyone).</td>
</tr>
<tr>
<td>Independent regulator</td>
<td>Semi-autonomous agencies usually established by law with a well-defined, separate, legislative base that outlines its objectives and functions, meant to be free of external political or other types of pressure.</td>
</tr>
<tr>
<td>Information asymmetry</td>
<td>A situation in which one party has more or superior information to another. Many corruption opportunities are created by information asymmetries. The ‘principal-agent problem’ partly requires that we redress the information asymmetries between principals and agents in order to level the field.</td>
</tr>
<tr>
<td>Intangible assets</td>
<td>Defined as identifiable, non-monetary assets that cannot be seen, touched or physically measured, which are created through time and/or effort and that are identifiable as a separate asset</td>
</tr>
<tr>
<td>Integrity</td>
<td>Integrity is the Alignment of Accountability, Competence and Ethics, without Corruption (i.e., with Corruption Controls); the main characteristic is trustworthiness for stakeholders; it is not enough to trust, because the person must be worthy of that trust. Integrity exists and is strong only when all elements are present.</td>
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<tr>
<td>Integrity action</td>
<td>Integrity Action is an international non-governmental organisation promoting an integrity approach to reduce corruption in government, business and civil society, based on an education and community integrity building. Practical skills and behaviours are learned and practiced through the alignment of accountability, competence, ethics and corruption controls.</td>
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<tr>
<td>Integrity advice centre</td>
<td>A unit in an organisation that provides advice to employees in solving integrity or ethical challenges on the job.</td>
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<tr>
<td>Term</td>
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<tr>
<td><strong>Integrity approach</strong></td>
<td>The Integrity Approach to reducing corruption and/or solving integrity or ethical challenges is characterised by being: 1. Values-based 2. Aware of discrepancies between policies, rules and laws, and actual implementation 3. Collaboration focused to get violators to fix the problems by working with integrity, using conflict resolution methods, especially alternative dispute resolution methods 4. Solution-focused An integrity approach can be led from the top-down and/or bottom-up.</td>
</tr>
<tr>
<td><strong>Integrity education</strong></td>
<td>Teaching and training that promote integrity and anti-corruption through a values-based, collaborative, solution-focused process that can be top-down and bottom-up. Integrity education aims to prepare people of different ages and qualifications to become better at demanding integrity from others and practicing it themselves in their personal and work environments and professions.</td>
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<tr>
<td><strong>Integrity gap</strong></td>
<td>An integrity gap describes the gap between expected and actual standards of performance. Integrity gaps arise where an organisation fails to demonstrate the trustworthiness required to inspire stakeholder trust.</td>
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<tr>
<td><strong>Integrity leader</strong></td>
<td>An integrity leader is the individual responsible for championing the process to strengthen integrity within an organisation</td>
</tr>
<tr>
<td><strong>Integrity lens</strong></td>
<td>An Integrity Lens is an analytical tool to determine whether any given situation, action, decision or stakeholder demonstrates the key elements of integrity, namely Accountability, Competence and Ethics, without Corruption</td>
</tr>
<tr>
<td><strong>Integrity officer</strong></td>
<td>An employee in an organisation who is trained and responsible for assisting other employees in solving integrity or ethical challenges they face at work confidentially. As different from a compliance officer, the integrity officer’s main focus is to help the employee solve the problem rather than focus on litigation or reporting. Of course, when necessary, serious issues are reported.</td>
</tr>
<tr>
<td><strong>Integrity pact</strong></td>
<td>The Integrity Pact – developed by Transparency International – is a tool for preventing corruption in public contracting. It is essentially an agreement between the government agency offering a contract and the companies bidding for it – best if digitally managing this process - that they will abstain from bribery, collusion and other corrupt practices for the extent of the contract. To ensure accountability, Integrity Pacts also include a monitoring system typically led by civil society or other external groups.</td>
</tr>
<tr>
<td><strong>Integrity testing</strong></td>
<td>Measures taken either pre-employment or on the job, to assess a person’s propensity or characteristics towards dishonest or counterproductive behaviour.</td>
</tr>
<tr>
<td><strong>Integrity working group</strong></td>
<td>A cross functional group of people within an organisation that supports the integrity leader in championing the process to strengthen integrity within the organisation</td>
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<tr>
<td>Interest group</td>
<td>(UNDP) A private organisation representing a portion (usually small) of the general adult population; it exists in order to pursue particular policy objectives and seeks to influence government activity so as to achieve its particular objectives</td>
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<tr>
<td>Joint learning</td>
<td>The second stage in the process of Community Integrity Building characterised by identifying and training community monitors on data gathering, forming joint working groups and selecting development projects to monitor</td>
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<tr>
<td>'Jumping the queue'</td>
<td>Related to integrity, or lack thereof, 'jumping the queue' is when someone pays a facilitation fee to a service provider in return for giving the person priority in the receipt of services (see Facilitation Payments)</td>
</tr>
<tr>
<td>Kickback</td>
<td>An act done with the intent to give an advantage inconsistent with official duty and the rights of others. It includes bribery, coercion and extortion, among other acts.</td>
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</tbody>
</table>
| Leadership         | 1. A term that refers to a set of personality characteristics and behaviour of persons who lead others using formal and informal authority or personal influence.  
                        2. A group of people who lead an organisation |
<p>| Legal or social clinic | Legal or social clinics are facilities set up by a CSO/NGO or university to provide free advice to local citizens on legal or social topics that are important to them, or to advise them where they can get the legal or social advice they need. |
| Licencing          | A variation of contracting out in which government grants a license to a private concern to sell a product of service that would not otherwise be allowed outside the public domain |
| Licence to operate | Granting of permission to function as conduct a trade or business activity, which often denotes the adherence to a set of standards |
| Lobbying           | Attempts to influence a decision maker, usually a government official or legislator |
| Logical framework analysis (Logframe) | A logframe is a particular analytical tool often required by donor agencies to show how a project or program idea has been analysed, structured and systematised |
| Management by objectives (MBO) | (UNDP) A management technique designed to facilitate goal and priority setting, development of plans, resource allocation, monitoring progress towards goals, evaluating results, and generating and implementing improvements in performance |
| Meme               | Memes are social phenomena that evolve over time, much like genes do, through a process of natural selection. Corruption is a very successful meme. |
| Merit pay          | (UNDP) Increases in salary and wages that are tied to actual quality of work performed |</p>
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<tr>
<td><strong>Merit principle</strong></td>
<td>(UNDP) A concept that selection of government employees should be based on merit or competence rather than personal or political favouritism</td>
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<tr>
<td><strong>Mission</strong></td>
<td>A mission is a description of what an organisation does and why it currently exists. A mission statement should describe organisational purpose, using language that signifies intention</td>
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<tr>
<td><strong>Monitoring</strong></td>
<td>Monitoring is the process by which implementation is assessed in order to ensure that it has been done in accordance with the plan. It is common to compare planned and actual results at the level of activities and outputs. It means double-checking that activities and outputs have actually occurred as planned and also that they have achieved the desired results.</td>
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<tr>
<td><strong>Monopoly</strong></td>
<td>A monopoly exists when a specific person or enterprise is the only supplier of a particular commodity or service. Monopolies are thus characterised by a lack of economic competition to produce the good or service and a lack of viable substitute goods.</td>
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<tr>
<td><strong>Morals</strong></td>
<td>Morals are societal norms of expected behaviour. They tend to relate to what society sees as good or bad and right or wrong.</td>
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<tr>
<td><strong>Multi-stakeholder initiatives</strong></td>
<td>These are initiatives in which government, business, civil society and other stakeholder groups join together to provide oversight on public projects or service delivery, in an effort to ensure proper use of funds according to the contract and other project documents.</td>
</tr>
<tr>
<td><strong>National integrity system</strong></td>
<td>The National Integrity System is the institutional framework and mechanisms of the state and society that combine to promote sustainable development, the rule of law and the quality of life through integrity.</td>
</tr>
<tr>
<td><strong>Nepotism</strong></td>
<td>Showing favour to friends and relatives in appointments, promotions, services, etc</td>
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<tr>
<td><strong>Non-profit organisations</strong></td>
<td>(UNDP) Organisations prohibited by law from distributing surplus revenues to individuals; they often have social goals, working for the benefit of the public.</td>
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<tr>
<td><strong>Normative teaching</strong></td>
<td>Review of national and international legislation and institutional mechanisms (including by state, civil society, business), as well as key concepts and predominant approaches</td>
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<tr>
<td><strong>Objectives tree</strong></td>
<td>A hierarchic flowchart of objectives, supported by activities, outputs and outcomes within the Logframe approach. (See also Problem Tree)</td>
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<tr>
<td><strong>Ombudsman</strong></td>
<td>(UNDP) Permanent office – usually within a government - that receives complaints and acts on behalf of citizens to secure information, request services, or pursue grievances; often has a significant role in diagonal accountability within the National Integrity System</td>
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<tr>
<td><strong>Open contracting</strong></td>
<td>Refers to norms and practices for increased disclosure and participation in public contracting including tendering, performance and completion. It includes the variety of contract types, from more basic contracts for the procurement of goods, to complex contracts, joint venture agreements, licenses and production sharing agreements. Open contracting encompasses all public contracting, including contracts funded by combinations of public, private and donor sources.</td>
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<tr>
<td><strong>Open data</strong></td>
<td>The idea that certain data should be freely available to everyone to use and republish as they wish, without restrictions from copyright, patents or other mechanisms of control. The goals of the open data movement are similar to those of other “Open” movements such as open source, open hardware, open content and open access.</td>
</tr>
<tr>
<td><strong>Open government</strong></td>
<td>The governing doctrine which holds that citizens have the right to access the documents and proceedings of the government to allow for effective public oversight. In its broadest construction it opposes ‘reason of state’ and other considerations, which have tended to legitimise extensive state secrecy.</td>
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<tr>
<td><strong>Organisational change</strong></td>
<td>(UNDP) A theory of organisations that concentrates on increasing the ability of an organisation to solve internal problems of organisational behaviour as one of its routine functions; concerned primarily with identification and analysis of such problems.</td>
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<tr>
<td><strong>Organisational culture</strong></td>
<td>(UNDP) Basic patterns of attitudes, beliefs and values that underlie an organisation’s operation.</td>
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<tr>
<td><strong>Organisational ethics</strong></td>
<td>Provides specific guidance on behaviours in a professional and/or organisational context and notably how the organisation relates to its stakeholders. They essentially prescribe behaviours that should or shouldn’t be practised as a matter of obligation.</td>
</tr>
<tr>
<td><strong>Outcomes</strong></td>
<td>The state or situation that results from what you actually do.</td>
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<tr>
<td><strong>Output</strong></td>
<td>What you actually do.</td>
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<tr>
<td><strong>Participatory democracy</strong></td>
<td>(UNDP) A political and philosophical belief in direct involvement by affected citizens in the process of governmental decision making; believed by some to be essential to the existence of democratic government; related term is citizen participation.</td>
</tr>
<tr>
<td><strong>Patronage</strong></td>
<td>Patronage is the support, encouragement, privilege, or financial aid that an organisation or individual bestows to another. It often is used to describe political patronage, which is the use of state resources to reward individuals for their electoral support. As well, the term may refer to a type of corruption or favouritism in which a party in power rewards groups, families, ethnicities, etc. for their electoral support using illegal gifts or fraudulently awarded appointments or government contracts.</td>
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<td>Pedagogical methods – especially suited for Integrity</td>
<td>There are six main pedagogical methods for teaching integrity and anti-corruption: 1) normative and conceptual, 2) ethical and moral, 3) case study (in all its formats), 4) critical insights, 5) problem-centred and 6) action-learning. A variety of methods deepens and enhances learning, especially since people learn in different ways.</td>
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<tr>
<td>Performance appraisal</td>
<td>(UNDP) Specific evaluation with respect to an individual’s progress in completing specified tasks</td>
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<td>Performance indicators</td>
<td>These are measures or states used to evaluate performance to expected standards, based on data that an organisation itself can collect</td>
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<tr>
<td>Performance management</td>
<td>(World Bank) Generally understood to be the management of the performance of government organisations as a whole, their chief executives and their staff</td>
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<tr>
<td>Pluralism</td>
<td>A social and political concept stressing the appropriateness of group organisation that includes diversity of groups and their activities, as a means of protecting broad group interests in society; assumes that groups are good and that diversity among them will benefit the public interest.</td>
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</table>
| Policy | (World Bank) The set of laws, regulations or other government enforced rules or funding arrangements that:  
• Require, restrain or pay for actions from individuals, enterprises or government officials  
• Together contribute to the achievement of specific government objectives  
• Are recognised as interlinked |
<p>| Performance standards | A standard that represent a benchmark of required performance to apply in different areas of management and operating activity |
| Political decentralisation | (World Bank) Political decentralisation aims to give citizens and their elected representatives more power in local public decision making. It is often associated with pluralistic politics and representative government, and it can also support decentralisation by giving citizens or their representatives more influence in formulating and implementing policies. |
| Principal-agent-client problem | Fundamentally it concerns the difficulties of motivating one party to act on interests other than its own; often based on information asymmetries |
| Professionalism | The standards of education and training that prepare members of the profession with the particular knowledge and skills necessary to perform the role of that profession. In addition, most professionals are subject to strict codes of conduct enshrining rigorous ethical and moral obligations. Professional standards of practice and ethics for a particular field are typically agreed upon and maintained through widely recognized professional associations. |
| Private, not for profit agency | (World Bank) A formal agency volunteer programme, or a private non-profit service organisation in which volunteers provide all or part of a service either independently or under government direction. |
| Privatisation | (World Bank) Shifting functions, in whole or in part, from government to the private sector, where there is no continuing public policy reason to retain responsibility within government, or when that responsibility can be discharged through regulation |</p>
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<tr>
<td>Problems</td>
<td>For Community Integrity Building monitoring work, problems are instances of corruption or maladministration issues that need to be fixed. Choosing which problems to fix should be done as objectively as possible, as a significant discrepancy, e.g. between (a) a contract and its actual execution (b) a policy and its implementation, and (c) an entitlement and access.</td>
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<tr>
<td>Problem-centred teaching</td>
<td>Working on live, unresolved cases, preferably from the workplace (or personal life) of the individuals concerned. The problems should be used as an opportunity to test learning and concepts as well as to train on the ability to propose viable solutions.</td>
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<tr>
<td>Problem tree</td>
<td>A problem tree systematises the problems identified during a brainstorming process into relations of cause and effect of a particular problem area of interest to an organisation or community.</td>
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<tr>
<td>Behavioural learning <em>(also known as psycho-motor Learning)</em></td>
<td>Helping students acquire new skills – both analytical and practical – which they can physically and in actuality apply to cope with integrity challenges.</td>
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<tr>
<td>Public hearing</td>
<td>Public Hearings are meetings between citizens and local government (or representatives of national government) at which an issue important to local citizens is brought up for discussion. It is usually requested by the local community, and they may be encouraged to call for it by a local CSO who is working with them.</td>
</tr>
<tr>
<td>Public servants</td>
<td><em>(World Bank)</em> A wider group of employees than civil servants (who are employees of the government), public servants are employees of budget-funded organisations.</td>
</tr>
<tr>
<td>Public/private partnership</td>
<td><em>(World Bank)</em> A cooperative or joint venture between two or more parties in the public and private sectors, built on the strength and expertise of each partner.</td>
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<tr>
<td>Procurement</td>
<td>A process of acquiring goods and services in a structured way by (usually) large organisations (e.g., government institutions, large businesses and factories, etc).</td>
</tr>
<tr>
<td>Red tape</td>
<td>A term used to describe excessive paperwork needed to conform to the formal requirements to obtain an approval or achieve a goal. Usually used in reference to bureaucratic formalities and procedures of government institutions.</td>
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<tr>
<td>Responsibility</td>
<td>A form of trustworthiness; the trait of being answerable to someone for something or being liable for one's conduct.</td>
</tr>
<tr>
<td>Responsiveness</td>
<td>Responding with empathy, courtesy and timeliness to people and their needs.</td>
</tr>
<tr>
<td>Service charters</td>
<td>A document that lays out what standards of service stakeholders can expect from an organisation, sometimes negotiated jointly between government and beneficiaries. <em>(World Bank)</em> Statements of service targets published by service providing agencies that set standards for the agency and can define compensation to the public if they are not achieved. They are known by such names as “Citizens’ Charters” (UK) or “Public Service Charters” (Korea).</td>
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<tr>
<td><strong>TERM</strong></td>
<td><strong>DEFINITION</strong></td>
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<tr>
<td>Social capital</td>
<td>The intangible value of an organisation that includes social and interpersonal skills of officers and employees. A term referred to networks, connections, and affiliations of an individual that allows him/her to receive benefits and opportunities. Broadly a term referring to interrelations and networks formed by social actors in the society.</td>
</tr>
<tr>
<td>Social justice</td>
<td>Social justice is the reality for people to be treated equitably and realise their potential in the society where they live. The goal of social justice is generally the same as human development, and the relevant institutions are usually taken to include education, health care, social security, labour rights, as well as a broader system of public services, progressive taxation and regulation of markets, to ensure fair distribution of wealth, equality of opportunity, and no gross inequality of outcome.</td>
</tr>
<tr>
<td>Social responsibility</td>
<td>Social responsibility is an ethical theory that an entity, be it an organisation or individual, has an obligation to act to benefit society at large. Social responsibility is a duty every individual has to perform so as to maintain a balance between the economy and the ecosystems. It pertains not only to business organisations but also to everyone whose action impacts on the environment. This responsibility can be passive, by avoiding engaging in socially harmful acts, or active, by performing activities that directly advance social goals.</td>
</tr>
<tr>
<td>Spoilers</td>
<td>Individuals and groups that actively work to undermine reforms or proper compliance with norms and regulations.</td>
</tr>
<tr>
<td>Stakeholder</td>
<td>Stakeholders are the people and entities that are directly and/or indirectly affected by the decisions an organisation makes and the courses of action it pursues. A person, group or institution that is affected by or has an effect on the company with or without direct legal (corporate) rights. Primary stakeholders are those whose continued participation is considered absolutely necessary for the survival of an organisation. They either directly benefit from the products and/or services that an organisation provides, or are directly involved in processes to deliver them. Secondary stakeholders are not considered absolutely necessary for an organisation’s survival. They can nonetheless have a significant influence on its effectiveness and efficiency. Even remote secondary stakeholders can exert pressure, by calling into question an organisation’s legitimacy and right to exist.</td>
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<tr>
<td>Stakeholder mapping</td>
<td>This is a process to identify and prioritise key stakeholders based on their importance to your organisation and your organisation’s importance to them.</td>
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<tr>
<td>State capture</td>
<td>(World Bank) The actions of individuals, groups or firms, both in the public and private sectors, to influence the formation of laws, regulations, decrees or other government policies to their own advantage as a result of the illegal transfer or concentration of private benefits to public officials.</td>
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<tr>
<td>Strategic planning</td>
<td>(UNDP) Matching organisational objectives and capabilities to the anticipated demands of the environment to produce a plan of action that will ensure achievement of objectives</td>
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<td>Social accountability</td>
<td>Refers to a process of strengthening the ability of citizens, CSOs and other non-state actors to work with governments to hold them accountable and responsible for implementing the laws and regulations that have been passed or agreed by different legitimate bodies, but have often not been executed properly. It is also about encouraging government to be fully transparent, and responsive to citizens’ needs.</td>
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<tr>
<td>Social audit</td>
<td>A Social Audit is a particular form of data gathering of public information which is conducted in relation to a particular project or programme that has been carried out by a government body. It may be something that is part of the ongoing procedures of any local government project – or it may be something requested or carried out by the community. It usually takes place at the completion of a particular project, and is often reported in a public hearing.</td>
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<tr>
<td>Sustainability</td>
<td>The integration of economic progress, social development and environmental concerns with the objective of ensuring a consistent or better quality of life for future generations.</td>
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<td>Tangible assets</td>
<td>Tangible assets can be seen, touched, or physically measured (e.g. property, equipment, cash and other financial instruments)</td>
</tr>
<tr>
<td>Transparency</td>
<td>The practice of governments, companies and organisations communicating openly and in a straight-forward manner to provide important information to investors, shareholders and other stakeholders</td>
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<td>Trust</td>
<td>Trust is the willingness of one person (e.g., a stakeholder) to put him/her-self in a position of vulnerability to another (e.g., your organisation), in the expectation that his/her interests will not be abused. Trust is built on an expectation that the recipient of such trust (i.e., your organisation) can do what it claims. Trust is given voluntarily – it cannot be demanded; trust should not be given unless one is certain the subject is trustworthy</td>
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<tr>
<td>Trustworthiness</td>
<td>To be worthy of trust.</td>
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<tr>
<td></td>
<td>The extent to which measures are in place to build others’ confidence, based upon performance and behaviour</td>
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<tr>
<td>Value proposition</td>
<td>A value proposition is a tool for expressing why your organisation’s claim on the resources of its stakeholders is more valid than that of other, competing organisations. It should comprise a clear statement of the tangible and intangible results that the stakeholder can expect and the factors that set your organisation apart from others as a more attractive recipient of resources.</td>
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<tr>
<td>Values</td>
<td>Values represent the positive, motivating drive for organisational activities and the guidance for determining its priorities of action. They should inspire and guide individual behaviour within the organisation. They should underpin the intent and direction of your organisation’s strategy.</td>
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<td><strong>Vision</strong></td>
<td>A vision statement describes what an organisation aspires to be and give shape and direction to its future. In this way a vision is expressed as a desired future state.</td>
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<tr>
<td><strong>Whistleblower</strong></td>
<td>Employee or other contracted party who reports illegal activities going on inside the organisation</td>
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<tr>
<td><strong>Whistleblower hotline</strong></td>
<td>A telephone line dedicated to receiving information, often from an employee in an organisation, related to corrupt behaviour. It is often a means of maintaining confidentiality and anonymity.</td>
</tr>
<tr>
<td><strong>Whistleblower protection</strong></td>
<td>Rules and actions taken to protect a whistleblower from retaliation or harm carried out by the subject of the whistleblower’s disclosure of wrongdoing.</td>
</tr>
<tr>
<td><strong>White list</strong></td>
<td>A list of organisations (often suppliers of goods and services) that have been noted as having behaved with integrity in the past, and thus should be allowed and encouraged to provide goods and services in the future. (See also Black List).</td>
</tr>
<tr>
<td><strong>Zero tolerance</strong></td>
<td>A zero tolerance policy imposes automatic punishment for infractions of a stated rule, with the intention of eliminating undesirable conduct. Zero-tolerance policies forbid persons in positions of authority from exercising discretion or changing punishments to fit the circumstances subjectively; they are required to impose a pre-determined punishment regardless of individual culpability, extenuating circumstances, or history. This pre-determined punishment need not be severe, but it is always meted out.</td>
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INTEGRITY BUILDING: LEADERSHIP INSIGHTS

An integral component of corporate integrity building is the role model of top management in setting the direction and signalling of a preferred ethical culture. Integrity building goes beyond actions to reduce corruption. It includes management and staff reducing inappropriate behaviour, increasing the trust in individuals to act in a reasonable manner, acting with transparency and accountability, and seeking to mediate rather than litigate resolutions.

This section presents a series of insights, setting out the leadership response to specific incidents which collectively led to corporate integrity building. The response to specific incidents directly contributed to setting the tone of what was acceptable and appropriate ethical behaviour in the Group. The incidents, on which the snapshots have been based, have been presented in broad chronological order. This helps to illustrate how over time and with heightened integrity, the staff felt confident to “whistle-blow” knowing that appropriate action would be taken and that their own position would be protected, i.e., there was a heightened level of trust. For each vignette, the situation is outlined, for which a response was made by the CEO. Each response can be categorised according to the “Integrity versus Compliance” framework as proactive or reactive integrity building decisions, as outlined in the introductory section:

- Reactive Compliance
- Reactive Integrity
- Proactive Compliance
- Proactive Integrity

Questions

Situation: In the first week of the new CEO being in office, his secretary (who had been PA to the previous CEO for some 15 years) asked the CEO to sign off the expenses of the cost of a sandwich lunch. Response: The CEO told her this was not his role and that she should sort it out with the Interim Finance Director as to what her level of financial authority should be - and just do it. This sent a low key but effective message throughout the business that a secretary could be expected to act in a reasonable manner and had the authority to do so.

Situation: Within two months of joining, the CEO took the executive team for dinner after a late working session. One of the executives offered to pay on his company credit card. Response: The CEO stated that he would pay and that the senior person present should always pay, not his/her junior. This reinforced a basic tenet of management whereby responsibility and accountability are co-joined.

Situation: Within two months of joining, the CEO was informed that the Group had entered an agreement with an Indian party for it to purchase the IPR (Intellectual Property Rights) of a vintage product in return for a royalty payment. However, the Indian government had not approved payment of the royalty. But there was a circuitous route whereby payment could be made. Response: The CEO cancelled the agreement. At best, the circuitous route was hardly ethical in that it was avoiding a government ruling; at worse, it could be a corrupt practice in evading a legal requirement.

Situation: Within three months of joining, the CEO was requested to authorise a payment to an Indian supplier to a bank account in Germany which did not have the Indian company’s name. Response: The CEO refused to authorise the payment, but added that if the bank account in Germany was in the supplier’s company name, then payment would be authorised. The view here was that the Group would only act in a transparent manner at an arm’s length with the supplier, and make payments only to the supplier’s bank account and not to a third party bank account in a third party country.

Situation: Within six months of joining, the CEO was informed by an executive that it might be useful for him to meet the CEO of a competitor firm for lunch in order to exchange views on market prospects and pricing. Response: The CEO did not arrange a meeting, and let it be known in a low key manner. Such a meeting could be open to interpretation as collusive behaviour in price fixing and hence would be in practice corrupt as it was breaking the law. Integrity building approach:

Situation: An executive returned from a business trip to China where a major supplier had presented him with a gift of a very expensive carpet. He asked the CEO...
A long serving and very experienced manager had informed all the team that they had a personal responsibility to ensure that the China country office was highly profitable because of the trust that had been placed in them by the Group in depositing such a large amount of money locally under the control of the country management. Consequently, increasing trust in local management led directly to local ownership of the drive to deliver improved business performance.

**Situation:** At the beginning of year two, it was evident that the South African operation was loss-making with no prospects of a turnaround to profitability. It was decided to close it down, with 13 staff being made redundant. Response: The CEO with the HR executive director visited the South African office for a week. They arranged for the office to be made available for all the redundant staff until the lease expired (some six months' away). A core team was offered an agency agreement with the Group. The oldest member of staff, in his 70s, and a pregnant administrative officer were retained to sell off the stock of spares on a bonus basis. The CEO felt it was important for him to not only be seen to be taking hard business decisions but also to be seen to be delivering them personally and in a reasonable manner.

**Situation:** The Group had a UK-based Quality Assurance (QA) Department, which consisted of one manager and two support staff. Its main activities were largely the production of very large QA manuals and then inspection on whether the processes in the QA manual were being followed, which in turn was followed up with comprehensive and detailed "Non-compliance" reports. At the beginning of year two, the executive director responsible for it suggested that the system was "not working" and he asked what he should do. Response: He was asked by the CEO to come up with his own recommendation. His recommendations were adopted. The department was closed. It was replaced by all departments being responsible for their own QA and that non-compliance work was referred back to the originator department for correction. The level of non-compliance was tracked and reported monthly. QA also became an integral part of all Business Improvement Workshops and initiatives.

**Situation:** For the China country operation to be 100% foreign-owned and to be able to import, trade locally and export, the Group was required to deposit in a local bank account a full year's operating costs. The signatories to the bank account were the local country manager and deputy. They had been promoted after the lack of success with a succession of two expatriate country managers. Response: In the course of a normal country office visit by the CEO and over an informal dinner with all local staff, he was informed in halting English by a junior staff member that the country manager had informed all the team that they had a personal responsibility to ensure that the China country office...
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Situation: At a UK company workshop on the Internet-based data bank holding some 80% of all Group information, the CEO was asked whether the people in the China operation could be trusted with access to so much proprietary data. Response: The response from the CEO was to ask how did we know who we could trust? If it proved to be the case that an individual could not be trusted, then there was no future for that person with the Group - irrespective of the country they came from. Again, this was in accordance with the Group’s values: treat colleagues how you want to be treated.

Situation: The CEO was made aware that an executive had authorised payment for two managers and their families to go on holiday. Response: The CEO traced the documentation and subsequently asked the executive why these managers merited such exceptional treatment. He also reminded the executive that the managers would need to declare these benefits on their own tax return. The executive asked who would pay the tax as it was unfair to expect the managers to pay it. The CEO’s response was that the person who authorised the expenditure should pay the tax (i.e., the executive). This incident illustrates how inappropriate behaviour can be “converted” into appropriate behaviour through a mediated rather than a litigated resolution. And, the identity of the “whistle-blower” was protected.

Situation: A very successful manager told his executive director that he would be in court for accidentally visiting child pornography sites on his PC, but his wife and daughter were standing by him. Following discrete enquiries, it was learned that the case was a very serious one. The manager subsequently served his prison sentence. On release from prison, he asked to rejoin the Group. He was asked about the severity of his case. He re-confirmed that it was a minor case and that he had been given a prison sentence due to poor advice from his solicitor and bad luck. Response: He was refused a position with the Group, as continuing to lie was not acceptable behaviour.

Situation: A major Japanese customer had integrated into its equipment the product of a Japanese competitor, which looked in parts very similar to the Group’s product. On examining the website and technical journals of the competitor, it was clear that the Japanese competitor had infringed the Group’s patented IPR (Intellectual Property Rights). Response: An executive went to visit the Japanese customer. He explained that it was very embarrassing for him to report that they were purchasing and using a counterfeit product that infringed the Group’s patented IPR. And, if the Japanese customer’s product failed at its customer’s installation, then they would not have insurance cover due to this infringement. The Japanese customer returned to buying the product from the Group and not the Japanese competitor. This demonstrates the benefit of seeking a mediated response to an issue rather than litigate for a result (which would have cost more and led the Group to having a dissatisfied customer).

Situation: A member of staff informally briefed the executive responsible for that area of the Group’s business that a senior, long serving and very successful manager was sending a series of insulting and very crude emails to fellow staff about the executive. The executive sought guidance from the HR executive director, who recommended that the CEO should be informed. Through examining the Group’s email server, copies of the emails were obtained. This confirmed there was a serious issue to be investigated and also the identity of the whistle-blower was protected. Response: It was agreed that the HR executive director would meet the senior manager and get his view. His response was that the emails were meant as “a joke”. The executive was prepared to give the senior manager a second chance if he were to be re-located to a different part of the Group. However, it was decided that due to the nature of the emails and the senior manager’s continuing attitude that it was no more than a joke, the individual needed to leave due to not recognising that he was behaving in an inappropriate manner. He was offered and accepted early retirement without any compensatory payments.

Situation: A long serving country manager suggested that he take a less onerous position and that a younger person should be promoted internally to take on the role. This was agreed and put in place. Several months later, a long standing member of staff brought to the
attention of the new country manager that the former country manager had some considerable time ago purchased a car, had kept it for his own purpose, and it was no longer shown as a company asset. The new country manager informed the executive responsible for the country. Response: The executive responsible for the country met the former country manager and offered him the alternative of resigning with grace or being dismissed with immediate effect. He resigned with no compensatory payments.

On reflection, the leadership style of responding to incidents could be seen to incrementally build up heightened integrity. Staff at all levels had increasing confidence of “how things are done around here” and the new culture had clear behavioural guidelines.

Over time, the pragmatic guiding principles adopted for whether a decision being taken was with integrity were: whether it would pass the “sniff test” (if there was an element of a distasteful smell, then the decision needed to be re-visited); and, whether it would be possible to explain the decision to a third party in a short simple sentence (If not, then the decision should be re-visited). This was clearly apparent in the feedback from Staff Satisfaction Surveys and the range and searching tone of questions at staff briefings. In categorising the above decisions as “compliance” or “integrity” with each being either “reactive” or “proactive”, this assists in demonstrating how leadership not only has the responsibility of setting the moral compass of a business, but also has to be seen to be behaving in the appropriate manner and be taking appropriate decisions. An integrity building approach does not consist of a single set of actions or decisions, but it must consist of activities and decisions across all four quadrants of the “Integrity versus Compliance” framework. There are different tools for different incidents.

Questions and answers

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Situation: An executive returned from a business trip to China where a major supplier had presented him with a gift of a very expensive carpet. He asked the CEO what he should do about it. Response: He was told to send a “note to file” to the CEO with a copy to the Finance Director. The CEO would then “sign off” the note with authorisation for the executive to keep the carpet. This reinforced the requirement for and benefit of top management acting with transparency. Integrity building approach: a proactive integrity decision.

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with no prospects of a turnaround to profitability. It was decided to close it down, with 13 staff being made redundant. Response: The CEO with the HR executive director visited the South African office for a week. They arranged for the office to be made available for all the redundant staff until the lease expired (some six months’ away). A core team was offered an agency agreement with the Group. The oldest member of staff, in his 70s, and a pregnant administrative officer were retained to sell off the stock of spares on a bonus basis. The CEO felt it was important for him to not only be seen to be taking hard business decisions but also to be seen to be delivering them personally and in a reasonable manner. Integrity building approach: a proactive integrity decision.

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**Situation:** A long serving and very experienced manager went outside his delegated authority in submitting a quotation which he had classified as both high technical and high financial risk. His executive director asked the CEO what he should do about it. Response: The CEO asked the manager to see him and asked him what he thinks would happen if he did it again. The reply from the manager was: “You’ll probably sack me”. The CEO also asked the manager what he felt the CEO was going to do immediately. The manager answered “nothing”. The CEO told the manager that he was correct on both accounts and that was the end of the meeting. (The manager continued to have a very successful career with the Group). Both parties recognised what was appropriate behaviour in resolving an incident that could have led to dismissal of a member of staff as he had put the Group at a multi-million pound risk through breaching, in a substantive and high risk manner, the Scheme of Delegated Authority (counter to a major Group value). Integrity building approach: a proactive compliance decision.

**Situation:** At a UK factory workshop, a sometimes troublesome trade union shop steward was noted as having “fallen asleep” in the session. His manager instigated a disciplinary process on the grounds that falling asleep was a “health and safety” issue. The HR executive director advised the manager that this was inappropriate. The manager’s response was that he was following the policies in the Group’s “Staff Handbook” and if he withdrew the case then his authority would be undermined. Response: The HR executive director informed the manager that there would be a recommendation to cancel the process. The manager responded that according to the “Staff Handbook” that such course of action was subject to appeal and that this should be heard with the attendance of another executive director. The executive team agreed to cancel the disciplinary process and informed the manager accordingly. He shortly left the Group. It was evident that the manager could not be trusted to act in a reasonable manner, so the decision was taken away from him. He also realised that he did not fit the Group’s ethics. Integrity building approach: a reactive integrity decision.

**Situation:** It was decided to change the UK company’s pension scheme from a final salary defined benefit one (where the risk of meeting the pension payments lay with the company pension scheme) to a money purchase scheme (where the risk of level of pension payment was with the individual). A series of staff briefings was organised as the change would not be welcomed by staff. After the end of one of the briefings to staff from the factory, the HR executive director told the CEO that he had made a mistake in his briefing. Response: The CEO went down to the factory floor, called staff together and apologised, and set out what was the
correct position. This action was in accordance with the Group’s values: if a mistake is made, then acknowledge it and rectify it as soon as possible. Integrity building approach: a proactive compliance decision.

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**Situation:** At a UK company workshop on the internet base data bank holding some 80% of all Group information, the CEO was asked whether the people in the China operation could be trusted with access to so much proprietary data. Response: The response from the CEO was to ask how did we know who we could trust? If it proved to be the case that an individual could not be trusted, then there was no future for that person with the Group - irrespective of the country they came from. Again, this was in accordance with the Group’s values: treat colleagues how you want to be treated. Integrity building approach: a reactive integrity decision. Situation: The CEO was made aware that an executive had authorised payment for two managers and their families to go on holiday. Response: The CEO traced the documentation and subsequently asked the executive why these managers merited such exceptional treatment. He also reminded the executive that the managers would need to declare these benefits on their own tax return. The executive asked who would pay the tax as it was unfair to expect the managers to pay it. The CEO’s response was that the person who authorised the expenditure should pay the tax (i.e., the executive). This incident illustrates how inappropriate behaviour can be “converted” into appropriate behaviour through a mediated rather than a litigated resolution. And, the identity of the “whistle-blower” was protected. Integrity building approach: a reactive compliance decision.

**Situation:** A very successful manager told his executive director that he would be in court for accidentally visiting child pornography sites on his PC, but his wife and daughter were standing by him. Following discrete enquiries, it was learned that the case was a very serious one. The manager subsequently served his prison sentence. On release from prison, he asked to rejoin the Group. He was asked about the severity of his case. He re-confirmed that it was a minor case and that he had been given a prison sentence due to poor advice from his solicitor and bad luck. Response: He was refused a position with the Group, as continuing to lie was not acceptable behaviour. Integrity building approach: a proactive compliance decision.

**Situation:** A member of staff informally briefed the executive responsible for that area of the Group’s business that a senior, long serving and very successful manager was sending a series of insulting and very crude emails to fellow staff about the executive. The executive sought guidance from the HR executive director, who recommended that the CEO should be informed. Through examining the Group’s email server, copies of the emails were obtained. This confirmed there was a serious issue to be investigated and also the identity of the whistle-blower was protected. Response: It was agreed that the HR executive director would meet the senior manager and get his view. His response was that the emails were meant as “a joke”. The executive was prepared to give the senior manager a second chance if he were to be re-located to a different part of the Group. However, it was decided that due to the nature of the emails and the senior manager’s continuing attitude that it was no more than a joke, the individual needed to leave due to not recognising that he was behaving in an inappropriate manner. He was offered and accepted early retirement without any compensatory payments. Integrity building approach: a proactive compliance decision.

**Situation:** A long serving country manager suggested that he take a less onerous position and that a younger person should be promoted internally to take on the role. This was agreed and put in place. Several months
later, a long standing member of staff brought to the attention of the new country manager that the former country manager had some considerable time ago purchased a car, had kept it for his own purpose, and it was no longer shown as a company asset. The new country manager informed the executive responsible for the country. Response: The executive responsible for the country met the former country manager and offered him the alternative of resigning with grace or being dismissed with immediate effect. He resigned with no compensatory payments. Integrity building approach: a reactive compliance decision.

On reflection, the leadership style of responding to incidents could be seen to incrementally build up heightened integrity. Staff at all levels had increasing confidence of “how things are done around here” and the new culture had clear behavioural guidelines.

Over time, the pragmatic guiding principles adopted for whether a decision being taken was with integrity were: whether it would pass the “sniff test” (if there was an element of a distasteful smell, then the decision needed to be re-visited); and, whether it would be possible to explain the decision to a third party in a short simple sentence (If not, then the decision should be re-visited). This was clearly apparent in the feedback from Staff Satisfaction Surveys and the range and searching tone of questions at staff briefings. In categorising the above decisions as “compliance” or “integrity” with each being either “reactive” or “proactive”, this assists in demonstrating how leadership not only has the responsibility of setting the moral compass of a business, but also has to be seen to be behaving in the appropriate manner and be taking appropriate decisions. An integrity building approach does not consist of a single set of actions or decisions, but it must consist of activities and decisions across all four quadrants of the “Integrity versus Compliance” framework. There are different tools for different incidents.