





Module 13
Public Integrity and Ethics

UNITED NATIONS OFFICE ON DRUGS AND CRIME Vienna

Knowledge tools for academics and professionals

UNODC Module Series on Integrity and Ethics

MODULE 13 PUBLIC INTEGRITY AND ETHICS



Background information

The UNODC Module Series on Integrity and Ethics offers 14 Modules focusing on a range of core issues within these two areas. This includes universal values; ethics and society; the importance of ethics in the public and private sectors; diversity and pluralism, behavioural ethics; and ethics and gender mainstreaming. The Modules also illustrate how integrity and ethics relate to critical areas such as the media, business, law, public service, and various professions.

The Modules are designed for use by both academic institutions and professional academies across the world. They are built to help lecturers and trainers deliver ethics education, including those who are not dedicated ethics lecturers and trainers but would like to incorporate these components into their courses. Lecturers are encouraged to customize the Modules before integrating them into their classes and courses. The Modules include discussions of relevant issues, suggestions for class activities and exercises, recommended class structures, student assessments, reading lists (with an emphasis on open access materials), PowerPoint slides, video materials and other teaching tools. Each Module provides an outline for a three-hour class, as well as includes guidelines on how to develop it into a full course.

The Modules focus on universal values and problems and can easily be adapted to different local and cultural contexts, including a variety of degree programmes as they are multi-disciplinary. The Modules seek to enhance trainees and students' ethical awareness and commitment to acting with integrity and equip them with the necessary skills to apply and spread these norms in life, work and society. To increase their effectiveness, the Modules cover both theoretical and practical perspectives, and use interactive teaching methods such as experiential learning and group-based work. These methods keep students and trainees engaged and help them develop critical thinking, problem solving, and communication skills, all of which are important for ethics education.

The topics of the Modules were chosen following consultations with academic experts who participated in a meeting of experts convened by UNODC, both at a global level in Vienna in March 2017, and in three regional workshops held in different parts of the world in April 2017. The experts emphasized the need for increased integrity and ethics education globally and advised on core areas to be addressed through the Modules. They considered it paramount that the Modules prepare university students and trainees for value driven effective action, keep students engaged, lend themselves to adaptation to different regional and disciplinary contexts, and allow lecturers to incorporate them as ethics components within non-ethics courses.

To achieve these objectives, the experts recommended that the Modules have a range of characteristics, ultimately being able to:

- » Connect theory to practice
- » Emphasize the importance of integrity and ethics to everyday life
- » Encourage critical thinking
- » Stress not only the importance of making ethical decisions but also demonstrate how to implement the decisions
- » Use innovative interactive teaching methods
- » Balance general ethics with applied ethics

- » Draw on good practices from practitioners
- » Link integrity and ethics to other global issues and the SDGs
- » Adopt a multi-disciplinary and multi-level approach
- » Focus on global ethics and universal values while leaving room for diverse regional and cultural perspectives
- » Employ non-technical and clear terminology
- » Be user-friendly

Drawing on these recommendations, UNODC worked for over a year with more than 70+ academic experts from over 30 countries to develop the 14 University Modules on Integrity and Ethics. Each Module was drafted by a core team of academics and UNODC experts, and then peer-reviewed by a larger group of academics from different disciplines and regions to ensure a multi-disciplinary and universal coverage. The Modules passed through a meticulous clearance process at the UNODC headquarters before finally being edited and published on its website as open-source materials. In addition, it was agreed that the content of the Modules would be regularly updated to ensure that they are in line with contemporary studies and correspond to current needs of educators.

The present knowledge tool has been developed by the UNODC Corruption and Economic Crime Branch (CEB), as part of the Education for Justice initiative under the Global Programme for the Implementation of the Doha Declaration.

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Introduction

This Module examines methods and approaches to strengthening integrity in the public sector. It is designed to be used by lecturers who wish to introduce students to the importance of public service integrity and the ways in which public organizations can promote ethical working environments. The Module explores the concept of integrity management in the public sector. It also discusses other ethical frameworks that apply to public organizations, such as codes of ethics and codes of conduct. After highlighting the importance of integrity in the public sector – or public integrity – the Module focuses on two main ideas. The first idea is that ethical behaviour is driven by both external and internal incentives. Therefore, establishing ethical public organizations requires processes that reach stakeholders' minds and hearts. The second idea examined in the Module is that strengthening the integrity of public organizations requires working in parallel on personal ethics, organizational culture, and management systems. The discussions build on the concepts elaborated in E4J Integrity and Ethics Module 1 (Introduction and Conceptual Frameworks) and Module 14 (Professional Ethics). Going beyond theoretical and conceptual explanations, the Module includes interactive exercises that help students reach a deeper understanding of the issues.



Learning outcomes

- Understand the key instruments for strengthening public integrity and ethics and the processes of integrity management in public organizations
- · Appreciate the challenges involved in strengthening integrity and ethics in the public service
- Analyse codes of ethics as specific sets of public values and action principles, and understand the interdependence of the values
- Evaluate and analyse public service scenarios and understand how to identify and manage the risk of integrity breaches

Key issues

Integrity of the public sector – or public integrity – refers to the use of powers and resources entrusted to the public sector effectively, honestly and for public purposes. Additional related ethical standards that the public sector is expected to uphold include transparency, accountability, efficiency and competence. Staff members of the United Nations, for example, are required to "uphold the highest standards of efficiency, competence and integrity", and integrity is defined by the United Nations Staff Regulations as including but not limited to "probity, impartiality, fairness, honesty and truthfulness in all matters affecting their work and status" (UN Staff Regulations 1.2(b). The concept of public integrity has also been defined in broader terms as "the consistent alignment of, and adherence to, shared ethical values, principles and norms for upholding and prioritising the public interest over private interests in the public sector" (OECD, 2017, p. 7).

Public integrity is essential for advancing the public good and ensuring the legitimacy of public organizations. It is also considered an antithesis to corruption, as recognized by articles 7 and 8 of the United Nations Convention against Corruption (UNCAC)¹. However, strengthening integrity in the public service is a complex challenge that involves more than merely requiring staff members to uphold personal and professional ethical standards. Without an ethical culture and an appropriate integrity management system at the organizational level, civil servants may confront obstacles which will prevent them from acting with integrity on the individual level despite their best efforts.

Integrity and Ethics Module 1 (Introduction and Conceptual Framework) and Module 14 (Professional Ethics) explore in detail the issues of personal and professional standards of integrity and ethics, which apply at the individual level. The present Module, by contrast, focuses on the approaches through which integrity and ethics can be strengthened in the public sector at the organization level. Such an organizational perspective is not entirely divorced from the individual level standards, but it amounts to a systemic approach that combines measures for promoting ethics at the individual level (e.g. training, leading by example) with organizational measures such as audits, complaint mechanisms, hotlines, disciplinary bodies and proceedings, rules and procedures aimed to reduce opportunities for unethical behaviour, and incentives for encouraging individuals to speak up against unethical behaviour (such as those discussed in Integrity and Ethics Module 7 (Strategies for Ethical Action)).

Against this backdrop, the Module discusses public integrity from an organizational perspective. In this context, it examines the concept of 'integrity management', as well as the use of codes of conduct and other measures for promoting ethics within public organizations. Its key message is that to ensure integrity and ethics in public organizations, there is a need for a systemic approach which combines compliance-based (or rule-based) and value-based elements (Huberts, 2014, p. 179). To situate the discussion within the broader context of public service, the Module begins with an overview of public service goals, values and obligations. It subsequently discusses public integrity management and some of the key instruments for strengthening public integrity.

¹ Available from the website of UNODC (<u>www.unodc.org</u>)

Public service goals, values and obligations

The public service in any country consists of public organizations and the individuals working within them. Public organizations are specifically established by the State to fulfil public purposes and remain directly accountable to the state. Such organizations include ministries, public hospitals, public schools, the military, police, and so on. The purpose of public organizations is to serve the public interest, i.e. the interest of the whole community. This contrasts with private organizations, such as companies, that often only serve private interests of the owners or shareholders.

Another key difference between public and private organizations is that the former are funded largely by obligatory contributions from citizens, namely, taxes and fees. This means that individuals have no choice but to finance the services, as opposed to the free choice at the basis of consumer decisions in the private sector. The legitimacy of the public service, therefore, depends on citizens' trust. To win this trust, public service needs to be just, fair, transparent, responsive to citizens' needs, and compliant with the relevant laws, regulations and quality standards. In addition, results must be achieved through an impartial, lawful and accountable process. These are key public service values, which underpin the effective operation of the governance system. When citizens regard public service delivery as a legitimate process, they are likely to comply with the relevant rules and norms. This, in turn, will lead to a more efficient governance system which can focus on delivering services and promoting public interests rather than coercing compliance.

State-owned enterprises are sometimes viewed as a bridge between the two sectors, because they are owned by the State and usually support a key socio-economic objective (e.g. electricity or telecommunications), but they operate on commercial principles. However, since they are State-owned and State-funded they should adhere to ethical standards of public organizations. There can of course be private organizations that provide services with social characteristics, such as private hospitals. But they are not State-owned or State-funded and therefore not considered public organizations. It is noted that irrespective of the differences between the private and public sectors, all organizations must comply with the laws and regulations specific to their area of work, such as those related to health and safety standards, data protection rules, and environmental regulations. In addition, professional employees, where in public or private organizations, must uphold professional ethical standards.

The employees of public organizations are often called public servants or public officials. The latter term is defined broadly by the UNCAC as:

(i) any person holding a legislative, executive, administrative or judicial office of a State Party, whether appointed or elected, whether permanent or temporary, whether paid or unpaid, irrespective of that person's seniority; (ii) any other person who performs a public function, including for a public agency or public enterprise, or provides a public service, as defined in the domestic law of the State Party and as applied in the pertinent area of law of that State Party; (iii) any other person defined as a "public official" in the domestic law of a State Party.

For present purposes, the terms public servant and public official are understood according to the broad UNCAC definition.

Public servants are expected to make decisions with high levels of professionalism and commitment to the public good, and in a transparent and accountable manner. The three most essential obligations of public servants, which underpin their public decision-making, are to follow the law, use public resources in an effective manner, and act ethically. The importance of the obligation to act ethically is emphasized in article 8 of the UNCAC, which requires States to promote "integrity, honesty and responsibility among its public officials" in order to prevent corruption. In addition, public servants are also expected to reflect on all the values and principles included in the code of ethics or code of conduct that guide the work of their institution (Lewis and Gilman, 2012, pp. 28-30). Failure on any of these fronts would carry the risk of damaging public trust, and therefore harming the quality and effectiveness of the system. Lewis and Gilman have described the public servant as a "temporary steward" who is entrusted with power and authority to make decisions on behalf of the community. They refer to five core ethical values in the public service: accountability, impartiality, justice and fairness, avoiding harm, and doing good. They break down these core values into action principles as illustrated in the following table:

Table 1: Public Service Core Values and Action Principles

Value 1 - Accountability

Action principles:

- Reject incompetence
- Seek efficiency
- · Seek effectiveness
- Take responsibility for what is done and how
- Facilitate transparency
- · Listen and be responsive

Value 2 - Impartiality

Action principles:

- Avoid conflict of interest
- Seek inclusion
- Be objective
- Pursue the public interest

Value 3 - Justice and fairness

Action principles:

- · Comply with law
- Seek procedural and substantive justice
- Seek fair distribution of public benefits

Value 4 - Avoiding doing harm

Action principles:

- Provide remedy or relief
- Use moral imagination

Value 5 - Do good

Action principles:

- Employ empathy
- · Give affirmative help

> Public integrity management

As noted earlier, public organizations serve the welfare of the community. They are under an obligation to use the resources entrusted to them effectively and efficiently, and according to legal norms and shared ethical values. The traditional approach to promoting ethics in public organizations was based on enforceable rules and discipline. During the last decades, however, the increasing level of complexity and speed of change in the world called for more flexible adjustment processes in public service delivery. In this context, delegation of decision making and wider discretion was allocated to staff. While such delegation and discretion potentially produces better results and more motivated public servants, they also carry the risk of misuse by unethical officials, who may use their power for private gain instead of advancing the public interest. To manage the ethical risk involved in discretionary decisions, and to strengthen the organizational integrity, public organizations put in place internal controls as well as performance and accountability frameworks. In parallel, public organizations adopt procedures aimed at strengthening employee motivation and promoting rule-based and principled decision-making. Alongside these, legal norms and regulations external to the organization require adherence to certain standards. Finally, a variety of internal and external bodies promote public integrity and compliance through means of investigation, auditing, training, and other functions. The system of laws, regulations, policies, practices, officials, bodies and units that promote ethical decision making, prevent corruption and advance the public good is generally referred to as an integrity management system (OECD, 2017, p. 9). Such systems might not always be called 'integrity management systems' but the concept is useful for present purposes as it acknowledges that promoting integrity and ethics in the public sector requires a systemic approach.

The starting point for the design of a public integrity management system is the mission: serving the community. Organizations define goals and values that derive from that mission, and translate those into operational rules that are conducive to the desired results. To ensure that daily activities are carried out in accordance with the operational rules, organizations establish internal control systems (e.g. in financial management and procurement). For operational rules and the corresponding internal control systems to make sense and be effective, the values and goals of the organization need to be aligned with the professional standards of the contributing professions. This can be a challenge in the case of public organizations that have wide and diverse mandates and many contributing professions that are guided by very different paradigms, such as in the case of a local municipality.

Take, for example, a local municipality's budgeting rules. The declared values of the organization (the local municipality) include responsiveness to citizens' expectations, accountability, respect for social cohesion, and sustainability. The declared goals are to support the vulnerable, ensure infrastructure availability throughout the municipality, maintain economic activities and working opportunities within the jurisdiction, promote effective and efficient use of resources, and maintain sustainable financial management. In a budget allocation process, the finance professionals will expect adequate spending ceilings and cost-benefit calculations. The engineers who implement infrastructure projects, in most cases, can easily provide quantitative calculations and adjust them to spending ceilings. The social service professionals, on the other hand, will require some discretion in individual cases in order to provide effective support for the vulnerable, as such support should be tailored to meet the needs in each individual case. Thus, the decision criteria for infrastructure projects could be quite simple and may even be included in the infrastructure strategy.

But for social assistance schemes, a different decision making procedure needs to be in place, with discretion allocated to the social department and the establishment of an internal control system that would ensure that the decisions are not biased or corrupt (e.g. involving a social committee or a higher decision maker as well as the legal department). Hence, different domains require different processes that lead to budgetary decisions, as well as different kinds of operational rules and internal controls.

Moreover, rules and regulations are not sufficient on their own to guarantee integrity. Organizations must ensure that their integrity management system exists not only on paper, but is also translated into day-to-day practice. Part of this is a question of competencies, skills and discipline of staff. Another part is aspirational: staff should be committed to apply the rules. For this to occur, the personal and professional values of staff need to be aligned with organizational goals and practices. In this sense, an integrity management system aims to align these components, for example, through training, codes of conduct and codes of ethics. Such a systemic approach to integrity management is valuable because it targets the organization as a whole and seeks to ensure that organizational rules and values are mutually supportive and shared by all stakeholders.

While staff commitment and competence are essential for ensuring public ethics, accountability and enforcement measures are important as well. In this context, organizations must adopt procedures for reporting on integrity breaches as well as protection measures for those who report. Organizations should also put in place disciplinary regimes and control mechanisms such as internal audits and internal investigations. As discussed in further depth in Integrity and Ethics Module 7 (Strategies for Ethical Action), promoting a culture of integrity requires encouraging staff and organizations to learn from their mistakes rather than rely on blaming and punishing. However, in certain cases, ensuring compliance requires taking action against staff who violate the rules. There is a fine balance that needs to be struck between accountability and 'softer' learning processes.

However, even with the best enforcement mechanisms, rules can be broken. Therefore, not only material incentives but also abstract rewards should be used for establishing an ethical climate. This is consistent with the understanding that decision-making is not only rational but also driven by context and emotions, as explained in further detail in Integrity and Ethics Module 6 (Challenges to Ethical Living) and Module 8 (Behavioural Ethics). Therefore, while material incentives and sanctions are important, human behaviour is also influenced by more abstract rewards such as the feeling of belonging to the community or being seen as a valuable employee. Research shows that humans often put abstract rewards ahead of their biological needs (Eagleman, 2016, p. 114). This insight could guide strategies for strengthening ethical action in public organizations.

The essence of such abstract rewards is to publicly recognize the ethical, efficient and effective work of the public servant frequently and sometimes even immediately after appropriate performance. While there is little research on what rewards public servants value most, it can reasonably be assumed that the sense of accomplishment, recognition and ownership would be more important to a public servant than performance-related-pay. This has been confirmed by an OECD study which encourages the use of performance-related-pay but at the same time suggests that its effects should not be overestimated (OECD, 2007, p 5). Aside from recognition, public servants could also receive developmental rewards such as training, interesting/challenging assignments, and delegation of authority and responsibility. This motivates public servants to perform better and could encourage ethical conduct.

Organizations can also strengthen ethical awareness by promoting ongoing conversations about integrity, ethics and quality of work. Such conversations could help build public service motivation and prevent moral disengagement. They can create shared values, a safe environment and trust in organizations. Finally, organizations can establish an Ethics Office that can provide advice on ethical issues.

Against this background, public integrity management can be conceptualized as a process that uses rational, material, and emotional incentives to ensure ethical conduct of individuals and organizations. This process combines (external) rule-based incentives with (internal) value-based incentives that strengthen the motivation of staff to serve the goals of the organization. Both are necessary for public service integrity. The following paragraphs address possible approaches and instruments that can create a culture of integrity and promote ethical and rule-consistent behaviour of public servants and organizations.

> Ethical codes and other integrity instruments

A key instrument for strengthening integrity in any public organization is the code of ethics or code of conduct. These codes are formulated to capture the ethos of public service domains and professions, and guide the behaviour of actors. Both international organizations and national governments formulate ethical codes for the public service. The UNCAC, for example, urges States to apply "codes or standards of conduct for the correct, honourable and proper performance of public functions". Given that the meaning of honourable and proper performance may sometimes be context-dependent, the formulation of public service codes differs from one State to the other. In addition, different codes adopted for different public service domains or types of stakeholder relations (e.g. Code of Good Governance or Code for Civil Servants) might reflect specific contextual values.

Like the professional codes discussed in Integrity and Ethics Module 14 (Professional Ethics), codes of conduct for the public service are in some cases concise and in other cases more elaborate, containing a long list of values and principles. Public servants are expected to internalize the code so that it becomes an internal ethical compass for their decisions. Examples of how values such as accountability, transparency and responsiveness have been incorporated into public sector codes can be found in the collection of ethical codes on the OECD website². As a model, the United Nations developed the International Code of Conduct for Public Officials contained in the annex to General Assembly resolution 51/59 of 12 December 1996. The UNCAC refers to this model code as a source of guidance for States seeking to develop ethical codes for their public sector.

As explained in Module 14, a code of ethics can be distinguished from a code of conduct on the basis that the former typically provides goals or aspirations for professionals to reach (and is sometimes called an aspirational code) while the latter provides sanctions for failure to meet code requirements (and is sometimes called a compliance-based code or a disciplinary code). Aspirations can be standards to meet or matters to avoid. They can be stated with different degrees of precision. They are not necessarily addressed to actual behaviour, and they can recommend that staff strives to have certain attitudes, character, and take certain points into consideration during a decision-making process.

² Available at <u>www.oecd.org/gov/ethics/ethicscodesandcodesofconductinoecdcountries.htm</u>

Public service codes of ethics are put in place to strengthen values and intrinsic motivation of public servants. Because of their aspirational nature, not only the text but the process of creating and internalizing the code is also important. When staff members are involved in the process of designing the code (or other comparable rules) they become more aware of and emotionally committed to following the code. Communication, consensus building, co-creation, application discussions, induction and oath for new staff are additional instruments that can shape and strengthen the public service ethos. The very important 'tone from the top' as well as organizational rituals and on-going conversations about ethics at the workplace raise the awareness of public servants to ethical considerations and increase the chance that ethical issues and dilemmas are recognized as such, and not swept under the carpet by moral disengagement or automatic and technocratic responses. The resulting ethical climate creates positive peer and community pressure that increases the social rewards for acting ethically.

In addition to the aspirational value-based ethical codes, public organizations also use disciplinary compliance-based codes of conduct. These codes contain rules which public servants are obliged to comply with, and the formal sanctions for rule breaching. The disciplinary codes are meant as instruments for extrinsic motivation. A key difference between a rule-based instrument, such as a code of conduct, and a value-based code of ethics is that the former contains enforceable provisions. The need for such codes is emphasised in article 8 of UNCAC, which urges States to take "disciplinary or other measures against public officials who violate the codes or standards established in accordance with this article". It should be clarified, however, that in many cases the distinction between aspirational codes (of ethics) and disciplinary codes (of conduct) will not be so clear cut. Thus, for example, codes can be aspirational in part and also provide for sanctions in the case of serious misconduct. In these codes, only serious violations will entail sanctions.

Whether in the context of a code of conduct or another type of regulation, most public organizations adopt rules regarding conflicts of interest and post-employment restrictions. The issue of conflicts of interest is a fundamental problem in the context of ethical conduct in the public sector. A conflict of interest arises when public servants are in a position to personally benefit from actions or decisions made in their official capacity. For example, a public servant who must take a recruitment decision regarding a spouse, or a judge who has a financial relationship with one of the parties in a case, have a conflict of interest. In these situations, the public servant must disclose his or her conflict of interest, and recuse themselves from deciding on the matter. More examples of conflicts of interest can be found in this short article. Post-employment restrictions are meant to prevent conflicts of interest. For example, former public servants who worked in public procurement are prohibited from working for a company that was contracted by the organization for a certain period after leaving the public sector. Otherwise, there is a risk that the public servant would influence a public procurement decision that favours a company which he or she intends to work for in the future, and the company may be tempted to bribe the public servant by offering a lucrative job in return for a government contract. Further explanations about public service codes can be found in OECD (2009). It is noted that, in addition to codes of conduct, public servants are also guided by relevant laws and regulations pertaining to their work, including financial, health and safety aspects.

As noted previously, the tone from the top is one of the most important requirements for public integrity in any organization. It is highly unlikely that public servants at a ministry, hospital, or any other public organization will conduct themselves in an ethical manner if the leadership does not serve as an ethical role-model. This raises the question of whether ethical codes should apply to politicians (who head certain public organizations for a limited time during their term) and not only to public servants (who work at the organization permanently). Asset and interest declarations are often required of politicians but ethical codes are not always in place³.

Another critical issue is that of enforcement and accountability for integrity breaches. After all, the problems mainly arise when the ethical values are not lived. While intrinsic motivation for ethical behavioural is important, the manner in which an organization handles reports of integrity breaches is also crucial for deterring and rectifying such breaches. In this context, reporting structures and protections are important, as are disciplinary regimes and control mechanisms such as internal audits and internal investigations. As discussed in further depth in Integrity and Ethics Module 7 (Strategies for Ethical Action), promoting a culture of integrity entails encouraging staff and organizations to learn from their mistakes rather than blaming and punishing. However, in certain cases, ensuring compliance requires taking action against staff who violate the rules. So there is a fine balance between accountability and 'softer' learning processes.

Module 7 also discusses the importance of a safe environment for strengthening integrity in an organization. Part of this is supporting staff in dealing with dilemma situations and concerns. As noted earlier, public decisions must reflect all public values. In principle, the role of integrity management is to create decision-making processes that integrate reflections regarding the different values, and control mechanisms to check bias (Graaf-Huberts 2014). At the same time, there are dilemma situations in which public servants need to make difficult decisions. It is an important role of integrity management systems to create support for such decision making (including, for example, supporting potential whistleblowers before they decide to report formally). Safe organizational climate and ethical sensitivity of leaders and managers are key to ensure that dilemmas are discussed and concerns raised. Some organizations employ ethics counsellors or provide access to external legal counsel who can support individual decision-making or a structured process of dilemma discussion. Their role is to provide confidential advice in an effort to help individuals ascertain which course of action to take. Organizations can also facilitate discussions of recurring dilemma types in order to prepare staff for adequately responding in such situations.

Other key instruments for fostering an ethical culture in the organization are the requirement to take an oath, induction training, dilemma discussions, conversations about new rules, internal policy workshops, and continuing education. UNCAC article 7(1)(d), for example, encourages States to promote education and training programmes for public officials "to enable them to meet the requirements for the correct, honourable and proper performance of public functions". For strengthening and maintaining an ethical environment, it is important that staff members have a safe space and a structured process for discussing ethical issues, that they are encouraged to share diverse interpretations, listen to and understand others' arguments for applying certain values and rules, discuss potential consequences of decisions, feel included and heard, experience emerging consensus (or at least understanding the others' positions and concerns), and have a sense that more responsible decisions emerge at the end

 $^{^3}$ A guide on ethical codes for parliament members is available at $\underline{www.gopacnetwork.org/Docs/PEC_Guide_EN.pdf}$.

of the process. What might appear as an issue in this respect is the authority to carry out the training programmes, dilemma discussions and conversations. Training programmes may be a responsibility of the internal structures of the public organizations or there may be a separate, external entity responsible for training all public servants. In Lithuania, for example, most governmental ministries (Chlivickas, 2010, p. 4) have their own training centres and thus the public servants can continuously increase their knowledge and be reminded of the core values of the public service. Other States, in contrast, such as Denmark (Danish School of Public Administration), Czechia (Institute of State Administration), France (l'Institut de la gestion publique et du développement économique et le Centre des études européennes de Strasbourg), Germany (Federal Academy of Public Administration), Ireland (Institute of Public Administration in Ireland), Italy (Scuola Superiore Della Pubblica Amministrazione), have separate public institutions responsible for providing training to public servants. Regardless, the crucial point is that during the continuous trainings the public servants can not only deepen their knowledge but also discuss day-to-day challenges and obstacles which also lead to deviant and unethical conduct.

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Exercises and case studies

This section contains suggestions for in-class and pre-class educational exercises, while a post-class assignment for assessing student understanding of the Module is suggested in a separate section.

This Module is built on a student-centred, experiential teaching method. The aim is to involve students in reflection and discussion of difficult public problems and dilemmas, and make them experience how shared understanding and responsible responses may emerge from dialogue. The reflected experience opens doors to understanding the instruments and process of ethics and integrity management. The ideal group size for this method is 15-20 students. With this size of group, it is still possible to keep even plenary discussions alive and involve everybody in the dialogue. Although it is possible to teach this Module for large classes, it is more challenging to secure active involvement of students. Doing the same exercises with large groups may also take more time, and the lecturer might need to use different types of facilitation techniques. Each exercise is presented as an activity for a group of 15-20 students but at the end of the description of each exercise, we include suggestions for how to facilitate the exercise with large groups.

All exercises in this section are appropriate for both graduate and undergraduate students. However, some of the cases and discussion points used in the exercises may not be appropriate in the given social context. For the possibly sensitive exercises we offer alternatives or lecturers could find their own suitable alternatives.

> Exercise 1: Reception on values

After a short brain-storming on important values, distribute cards to the students and ask them each to write on the card one value that is the most important value in their life. Ask them to imagine that they are at an opening reception of a new programme, and must introduce themselves to the other students by referring to the value on their card. Their card is their business card. They must go to others and present themselves by explaining their guiding value. After short mutual introductions, they should walk to others, to make new contacts.

Lecturer guidelines

Give the students ten minutes to mix and talk, and then collect the cards and post them on a board or flipchart. Acknowledge variety and similarity of values and ask 'How did it feel to introduce yourself with your guiding value?' Students will probably share the fact that we rarely speak about values. The lecturer can emphasize the importance of speaking about values for creating shared values and mutual trust among people.

> Exercise 2: Ethics codes for public servants

Distributes the list of core values and action principles of the national public service code in your country or another national code for public service (see, for example, the public sector codes available on the OECD website. Divide students into five groups. Ask each group to work with one core value from Table 1: Public Service Core Values and Action Principles (see Key Issues section of the Module). The groups should identify the values and principles from the code with the corresponding core value they were assigned from Table 1. Finally, the group representatives explain their groups' choices before the larger class.

Lecturer guidelines

The lecturer should explain that many different but equally appropriate groupings and formulations of values and principles are possible. In each specific context, traditions and political culture impact such formulations. When the process of formulation is participatory, this can foster understanding and ownership among stakeholders and thus lead to the best outcomes.

> Exercise 3: Integrity breaching practices

Ask students to give examples of integrity breaching practices. Show them the video Just Do Your Job!⁴ and ask the students to react to the situation presented in the video. Lead the discussion towards the understanding that public servants may not be able to act ethically when their organizations have weak internal controls and low levels of compliance. Capture on a board or flipchart the integrity breaching actions shown in the video. Explain that the aim of public integrity and ethics management is to minimize the risk of such practices.

Lecturer guidelines

The "Just Do Your Job!" video features an obvious corruption case. However, it is important to note that the term "integrity breaching practices" encompasses corrupt practices and other forms of improper use of authority, such as harassment or other indecent treatment of colleagues. These breaches can result from organizational and personal incompetence, and weak internal controls and compliance.

⁴ Available at <u>www.youtube.com/watch?v=pzEMmSfNxw4</u>

> Exercise 4: Case studies and structured ethical reflection

Select a case study that presents ethical dilemmas and facilitate a discussion in a manner that allows students to experience effective dialogue and understand how the dialogue shapes interpretations and opinions. For example, have students sit in a horseshoe shape, and place two chairs at the open end of the horseshoe. On each of the two chairs at the open end place a sign with one of the possible solutions to the dilemma discussed. Ask students who wish to speak to move from their own chair to the chair reflecting their selected solution, and from there argue in favour of their solution. They should then move back to their own chair and listen to other students' arguments. Students can speak repeatedly if they have new thoughts, and they can also change their minds and arguments. They should, however, always speak from the chair representing their position. In a large-group setting the discussion could be facilitated in an "aquarium" setting. For example, approximately 15 students perform the exercise described above, and the others sit around as observers.

The lecturer can use for this exercise one of the two case studies presented below, or any other study that present ethical dilemmas. Relevant case studies can be found on websites such as http://ethicsunwrapped.utexas.edu/case-studies.

Lecturer guidelines

The lecturer captures the main arguments on a board or flip-chart, and may group the arguments according to the three main ethical theories: utilitarian, deontology and virtue ethics (these are discussed in Integrity and Ethics Module 1 (Introduction and Conceptual Framework).

The lecturer should wait as long as it takes for most ethical considerations to be articulated. If some important points are missing, the lecturer may take part in the exercise, adding the point and provoking further discussion among the students. The lecturer could make a quick summary of the arguments.

When arguments are exhausted, the lecturer asks students to reflect on their experience of the discussion and the process (debriefing). The lecturer could record their reflections on a board or flipchart. If positions changed during the discussion, this could be noted during the debriefing.

The debriefing should focus on the format and process. The first debriefing question is: How did you feel in this debate? After students have shared their feelings they should discuss what happened during the exercise. It is important to state that arguments have impacted others' opinions. At the end of the debriefing the students should discuss how the format influenced the discussion.

In summing up, the lecturer reinforces those ideas that are important for understanding the process of ethical management, such as: safe space; structured process; sharing diverse interpretations; understanding others' arguments; discussing potential consequences of decisions; understanding arguments for applying certain values and rules; feeling of inclusion and voice; experiencing emerging consensus, or at least understanding other's standpoint and concerns; more responsible decisions emerging at the end of the process.

The case studies below include additional case specific lecturer guidelines.

CASE STUDY 1: Disease Control Centre

Imagine that you work in a public health clinic that offers free and anonymous testing as well as confidential counselling and advice for HIV patients. During a counselling session, you find out from a patient who was diagnosed with HIV a year earlier that he does not inform his sex partners that he has HIV and does not use any protection. From the discussion, it seems obvious to you that he does not intend to change this practice.

What would you do? Would you feel you cannot do anything because your role is to provide confidential counselling and advice? Or would you report to your boss or to the police?

Lecturer guidelines

Make sure that students focus on arguments for choosing alternatives and avoid stereotyping and judging the patient. Let students discuss the options for as long as it takes them to understand the dilemma between the trust in the confidentiality of the service provides and the need to protect victims. Follow the general guidelines of Exercise 4. During the discussion, the lecturer may wish to mention that the patient's behaviour could amount to a serious crime in some countries, and explore the relevance of this point to ethical issues. A similar scenario with additional guidance for lecturers is provided in Role Morality Case Study 2 in Integrity and Ethics Module 14 (Professional Ethics).

CASE STUDY 2: Spraying against ticks

Imagine that there are ticks in your region which transmit serious (and potentially fatal) diseases such as Lyme disease and encephalitis. Spraying a certain chemical substance on plants and grass kills the ticks thereby considerably decreasing the risk of ticks infecting humans, but needs to be repeated periodically to be effective. Until recently, this chemical substance was available on the market and could be legally sprayed on plants and grass in gardens and public spaces. Last year an intergovernmental international organization introduced a ban on spraying the chemical in gardens and public spaces. The reason for the ban was a study which found that the environmental costs are higher than the benefit from spraying. It is possible that the study was carried out in countries where ticks do not carry such fatal diseases or where there are lower numbers of ticks compared to your country. Nevertheless, your country introduced a law that banned the use of the chemical for spraying plants. The chemical was still available and legally permitted for use in grain storages. The only protection against ticks is another spray that many refuse to use because it needs to be applied on the clothes and on the skin of people.

In the garden where your children play there is a danger of ticks. You always used the banned product and it worked. Would you spray it out this year as well, when you know that it has been banned for use in gardens and parks?

What if you were the head of social services in the local government, and the director of the local public kindergarten comes to your office explaining that there are many ticks in the yard of the kindergarten and parents want her to spray the plants to protect the children. She asks for your permission to spray the banned chemical substance that kills the ticks. Would you allow her to use the banned material?

Lecturer guidelines

Present the case study first as the dilemma of a private individual who has ticks in the garden where his children play. Students work on the dilemma for a short time (approximately 5 minutes) and in most cases rapidly agree to spray. Subsequently, present the second scenario, asking students to imagine that they are public servants who are asked to authorize the use of the spray to kill the infected ticks in the yard of the local public kindergarten. The discussion will probably last longer as the students explore the specific responsibilities connected to public roles. Ask students to reflect on the difference between the two scenarios and the consequences of the decision

Students usually agree to using the banned substance at home but have a long debate about whether the public servant should sign the contract. The lecturer should recall that public service decisions must be legal, effective and ethical. In this case, the three conditions cannot be simultaneously fulfilled. The lecturer should stress that making decisions in ethical dilemma situations is part of the role of public servants and entails taking responsibility. The lecturer could follow the general guidelines of Exercise 4.

Possible class structure

This section contains recommendations for a teaching sequence and timing intended to achieve learning outcomes through a three-hour class. The lecturer may wish to disregard or shorten some of the segments below in order to give more time to other elements, including introduction, icebreakers, conclusion or short breaks. The structure could also be adapted for shorter or longer classes, given that the class durations vary across countries.

The time slots below indicate the time needed for 20 person classes. If the class size is considerably larger and the lecturer decides to use the large-group techniques described at the end of the sections, more time is necessary for those parts.

Ice-breaker: opening reception on values (10 minutes)

- Introduce students to the topics addressed it the Key Issues section of the Module and explain the interactive teaching method.
- · Conduct Exercise 1.

Civil servant as a temporary steward (10 minutes)

- Present the five core values from Table 1: Public Service Core Values and Action Principles (see Key Issues section of the Module). The lecturer can distribute a handout with the table or show it on a PowerPoint slide.
- · Explain the concept of the "Temporary Steward".
- Ask students whether an important public value or principle is missing from the table.
- Facilitate a discussion around the students' responses.

Ethics Codes for Public Servants (30 minutes)

• Explain the role and content of ethic codes and conduct Exercise 2.

Public integrity (40 minutes)

- Conduct Exercise 3: screen the video and lead a discussion.
- Building on the discussion of the video scenario, explain that public integrity requires more than having ethical staff members. The operation system of public organizations, as well as their integrity management system also matters.

Structured ethical reflection of case study (20 minutes)

- Prepare chairs according to the description of Exercise 4.
- Explain the rules of the process before presenting the case study.
- Present Case Study 1 or another case dilemma, such as those available from http://ethicsunwrapped.utexas.edu/case-studies.
- Discuss the students' positions on the ethical dilemma.
- Discuss the students' views on the process and record their reflections on a board or flip chart (call your notes "Dialogue").

Strengthening public ethics and integrity (40 minutes)

- Discuss the instruments for building an ethical environment drawing on the relevant discussion in the Key Issues section of the Module (e.g. oath, induction training, code of ethics, dilemma discussion, discussion of new rules, internal policy workshops).
- Show your "Dialogue" notes from the previous discussion, and ask the group which of the listed ideas are relevant for building an ethical culture in organizations (e.g. creating safe space; sharing and understanding diverse interpretations; discussing consequences of decisions; experiencing emerging consensus).
- Divide the students into small groups and assign each group one instrument for building an ethical environment. Ask students to discuss two issues: (1) How can you use this instrument in a public organization? (2) What is the impact of the instrument on the integrity of the organization?
- After 15 minutes the group representatives present the results to the larger class.

Obligations of public servants (30 minutes)

• Using the format in Exercise 4, facilitate a discussion around Case Study 2.

Optional closing exercise if time allows: reception on public values

- Repeat Exercise 1 but this time ask the students to write on the card the public value they feel most strongly about, instead of their chosen personal value.
- Have students discuss with their peers the reasons for their selected public value.
- After 10 minutes, hand out to the students the cards from Exercise 1, and ask them to quietly compare their 'Public Values' card with their 'Personal Values' card from Exercise 1.
- Allow them time to reflect, but do not make any comments. At this point it is better to leave the students to share the last words and only thank them for their active participation.

Core reading

This section provides a list of (mostly) open access materials that the lecturer could ask the students to read before taking a class based on this Module.

Eagleman, David (2016). How I decide? In *The Brain: The Story of You*. Edinburgh: Canongate Books, pp. 107-144.

» The book presents new findings of neuroscience on how our brain works. The chapter "How do I decide?" provides an explanation of the both the rational and emotional nature of decisions. It discusses some ethical decisions in that context. It helps understand why process is key to ethical education and to developing public ethics and integrity. The book is not freely available on the Internet but the BBC film version is freely available from www.bbc.co.uk/programmes/b07030n9.

Gilman, Stuart C. (2005). Ethics Codes and Codes of Conduct as Tools for Promoting an Ethical and Professional Public Service: Comparative Successes and Lessons. World Bank.

» The document offers a concise introduction to public values and its first part explains the connection between the democratic system, its values and public ethics codes. Its style is simple and accessible even for students from disciplines far from the subject because it was written for development practitioners. The document is available from www.oecd.org/mena/governance/35521418.pdf.

Lewis, Carol W. and Stuart C.Gilman (2012). *The Ethics Challenge in Public Service: A Problem-Solving Guide*. San Francisco: Jossey-Bass, pp. 1-44 and 115-138.

» An authoritative book about public ethics that helps to understand the ethics challenge in public service and offers practical guidance to deal with ethical issues. The Introduction and Chapter 1 offer a comprehensive introduction to public ethics regimes and public integrity and into core public ethics values and principles. Chapter 5 gives detailed explanation and guidance to acting in ethical dilemma situations.

OECD (2017): Recommendations on Public Integrity. Paris.

» A summary that reflects state-of-the-art concepts of public integrity. It captures the systemic approach of public integrity management, the necessary activities and their linkages to society. The document is short, concise, written in a style accessible for all, nicely illustrated and available in multiple languages. The document is available from www.oecd.org/gov/ethics/Recommendation-public-Integrity.pdf.

Advanced reading

The following readings are recommended for students interested in exploring the topics of this Module in more detail, and for lecturers teaching the Module.

de Graaf, Gjalt, Leo Huberts and Remco Smulders (2014). Coping with public value conflicts. *Administration and Society*, vol. 48, No. 9 (April).

» A scholarly article that explains everyday value conflicts in public organizations and the mechanisms used in the public sector for dealing with these conflicts. The article is available from www.researchgate.net/publication/274983312Coping_With_Public_Value_Conflicts.

Huberts, Leo (2014). *The Integrity of Governance. What It Is, What We Know, What Is Done, and Where to Go.* Baskingstoke: Plagrave Macmillan.

» The book offers an overview of the integrity approach, its instruments and their implementation practices. It offers a comprehensive discussion of integrity management strategies.

Huberts, Leo and Alain Hoekstra, eds. (2016). *Integrity Management in the Public Sector: The Dutch Approach*. The Hague: Dutch National Integrity Office.

» This book is an overview of the history and actual condition of the Dutch integrity approach, one of the best practices of the field of integrity management. Especially useful are the case studies on integrity management systems in Chapters 8-12. The book is vailable from www.government.nl/documents/reports/2016/01/18/integrity-management-in-the-public-sector-the-dutch-approach.

Jørgensen, Torben Beck and Ditte-Lene Sørensen (2013). Codes of good governance: national or global public values? *Public Integrity*, vol. 15, No. 1 (Winter), pp. 71–95. The publication analyses the text of national codes from different countries and public service domains. It illustrates the nature and extent of diversity among national codes.

» This article offers a comparative analysis of codes of ethics. It is available from www.researchgate.net/publication/273340108_Codes_of_Good_Governance.

Integrity Action (2015). Live and Work with Integrity: You Can Do It!. London: Integrity Action.

» Integrity Action is an international NGO that focuses on initiating social processes to curb corruption. The publication addresses the role of integrity in mitigating corruption in the public sector and the role of different stakeholders in the process. It has a good balance of cases from different regions. Available from https://integrityaction.org/sites/default/files/publication/files/IAC_017_Integrity_Textbook_r5_WEB.pdf.

OECD (2009). Towards a Sound Integrity Framework: Instruments, Processes, Structures and Conditions for Implementation. Paris: OECD.

» The publication offers a comprehensive framework for integrity management in public organizations. It argues for a systemic approach and the alignment of rule- and value-based instruments in public organizations. It was written with a corruption prevention focus. The content goes much beyond the need of an introductory course but the publication can be a useful resource for lecturers who wish to have a deeper understanding of public integrity management. The publication is available from www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?doclanguage=en&cote=GOV/PGC/GF(2009)1.

Sampford, Charles, Rodnes Smith and A.J. Brown (2005). From Greek temple to bird's nest: towards a theory of coherence and mutual accountability for national integrity systems. *Australian Journal of Public Administration*, vol. 64, No. 2 (June), pp.96-108.

» Besides explaining integrity systems, the article presents metaphors for integrity management. These metaphors can help lecturers explain how the different components of integrity systems can interrelate with positive effect and, in most cases, make lasting imprints in students. The publication is available from www.researchgate.net/publication/230317133 From Greek Temple to Bird's Nest Towards A Theory of Coherence and Mutual Accountability for National Integrity Systems.

Sandel, Michael, J. (2009). *Justice: What's the Right Thing to Do?*. New York: Farrar, Straus and Giroux. » The book introduces readers into thinking about public morality and moral reflection through the analysis of contested public issues and ethical dilemma situations. It shows what sophisticated moral reflection and reasoned debate could bring to public life.



Student assessment

This section provides a suggestion for a post-class assignment for the purpose of assessing student understanding of the Module. Suggestions for pre-class or in-class assignments are provided in the Exercises section.

To assess the students' understanding of the Module, the following two post-class assignments are proposed. The first assignment is specific to public service ethics. However, it can be relevant for students who are not public administration specialists, as it can assess their knowledge and understanding of the Module. The second assignment asks students to think about what they could do to strengthen ethics in their own environment, creating strategies for action based on the discussion in Modules. This is not related specifically to public service ethics but encourages critical reflection, analysis and creative design, skills that are relevant to issues explored in the Module.

Assignment 1: Essay on a public service value

Students should select one public service value and write an essay on it.

- They should explain the value, review a national public service ethics code and identify the action
 principles connected to the value, or research different codes on the Internet and compare the
 different formulation of the value and action principles.
- They should also discuss what implications this value has on public services and public life if it is properly implemented.
- They should explain why this value is important for their life.

Assignment 2: What can I do for a more ethical environment?

Students should select one integrity breaching practice from their own environment (school, sport club, group of peers, family). Integrity breaching practice is a behaviour repeated by someone that breaches the formal or informal ethical rules or norms pertinent for the group/environment.

Students should write an essay covering the following questions:

- · Why has the practice evolved and why is it repeated?
- In what conditions, if at all, would you do something to change the practice?
- · How would you attempt to change the practice?

In their reflection, students should apply some of the concepts they learned in the Module.



Additional teaching tools

This section includes links to relevant teaching aides such as PowerPoint slides, video material and case studies, that could help the lecturer teach the issues covered by the Module. Lecturers can adapt the slides and other resources to their needs.

Case studies

Integrity Management in the Public Sector: the Dutch Approach.

» Chapters 8-12 of this publication are suggested for lecturers of a three-hour module who are not public sector specialists because they present organizational integrity systems in different public sector organizations. These cases show how integrity management processes can be implemented in practice. In the case of longer courses, the presentation of the approach and the discussion of some of the cases is also included in the suggested class sequence. The publication is available from www.government.nl/documents/reports/2016/01/18/integrity-management-in-the-public-sector-the-dutch-approach.

Resources about Integrity Pacts.

» These publications describe how governments can establish contracts with civil society stakeholders to assure integrity of project implementation. It can be used in the longer stand-alone-course together with the previous publication. The publications are available from www.transparency.cog/whatwedo/tools/resources_about_integrity_pacts/5.

Ethics Unwrapped: Cases.

» On this site, many short cases can be found that can be used instead of the cases included in the Module. The site is also an excellent source for short and clear explanations of key terms and good short videos. Available from http://ethicsunwrapped.utexas.edu/case-studies.

> Video material

Eagleman: How do I decide?

» The video is a lecture of David Eagleman about decision making. It can be assigned to students to watch before the class. Watching this video can be very important in the academic environment where the education is focused on rational theories and approaches because it calls students' attention to the psychological nature of human reactions and decisions. It can help students to understand value-building strategies, especially the so-called soft components of integrity management. Available from www.bbc.co.uk/programmes/b07030n9

Integrity Action: Just Do your Job!

» The video presents a dilemma situation in public service. The video has two different endings but both show that in organizations that lack integrity of operation staff members are defenceless and can get into situations where they have no good choices. It is also excellent material for asking students to identify elements breaching the integrity of persons or the integrity of the organization. The long list assembled by participants can be clustered into thematic groups. Available from www.youtube.com/watch?v=pzEMmSfNxw4

Ethics Unwrapped.

» On the site, many short videos can be found that provide clear explanation of key terms. They are excellent for classes where students speak good English or if resources are available for translation. Other pages of this site provide short cases that can be used in the Module if the lecturer aims to substitute the cases offered. Available from https://ethicsunwrapped.utexas.edu/videos

Robin Williams - Conformity - Dead Poets' Society.

» A short scene from the famous film Dead Poets' Society that can be used after a break to focus participants' attention on the class and introduce the discussion of ethics management. Available from www.youtube.com/watch?v=uNjdi4Q0yTo

Guidelines to develop a stand-alone course

This Module provides an outline for a three-hour class, but there is potential to develop its topics further into a stand-alone course. The scope and structure of such a course will be determined by the specific needs of each context, but a possible structure is presented here as a suggestion.

Session	Topic	Brief description
1	Personal values and ethical dilemmas	Students discuss their personal values, reflect on ethical dilemma situations and learn the three major ethical theories (i.e. utilitarianism, deontology, virtue ethics). This can be taught based on or together with Integrity and Ethics Module 1.
2	Ethical decisions	Students learn that decisions are the result of both rational cognitive and emotional processes. They watch the Eagleman video "How do I decide?" and discuss its relation to their own experiences.
3	The power of the context	Students watch a short film about Zimbardo's prison experiment and discuss how context can condition behaviour. They simulate some of the ethical experiments of Ariely and Mazar and discuss how framing and reminders change decision situations. This can be taught based on or together with Integrity and Ethics Module 6.
4	Ethical climate	Building on the films and experiments during the previous sessions, students explore how a positive climate and ethical reminders can be used to build an ethical climate.
5	The democratic system and its values	Building on their own positive collective experiences, students explore the systemic connections among democratic values and the implementation of values and public trust.
6	The role of public administration and public servants	Students explore the role of the public administration in the democratic system, the democratic value universe, the diverse relations among the components of the system and the specific values pertinent to these relations.

Session	Торіс	Brief description
7	Public ethics codes	Like the exercise in the Module but in an extended format, students explore the values and principles in the public ethics code of their own country and attempt to apply them in a particular case.
8	Clashing values in public service	Drawing on the Graaf-Huberts-Smulders (2014) article, students explore typical value clashes in the public sector and the standard mechanism for dealing with them. They also discuss strengths and weaknesses of these mechanisms, and what alternatives could be introduced for decision processes.
9	Public integrity management	Students learn about the aim, process and instruments of public integrity management. They also learn to distinguish rule-based and value-based processes and instruments.
10	Organizational integrity management	Some organizational integrity management systems are presented to students and they discuss how these systems apply the instruments and implement the objectives of public integrity management.
11	Working with civil society to strengthen integrity in public service delivery	Students learn about the community projects implemented by Integrity Action and the "Fix-Rate" methodology and the "Integrity Pact" method of Transparency International. They discuss the potential role of civil society stakeholders in assuring public integrity and potential projects in their own environment.
12	Strengthening integrity and ethics of my own environment	Students reflect in a structured process on how to initiate an integrity and ethics process or management system in their universities, while applying what they learned in the course. They identify existing instruments and evaluate them, and design additional instruments. If time and competences allow, they may even develop an integrity strategy for their university.



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