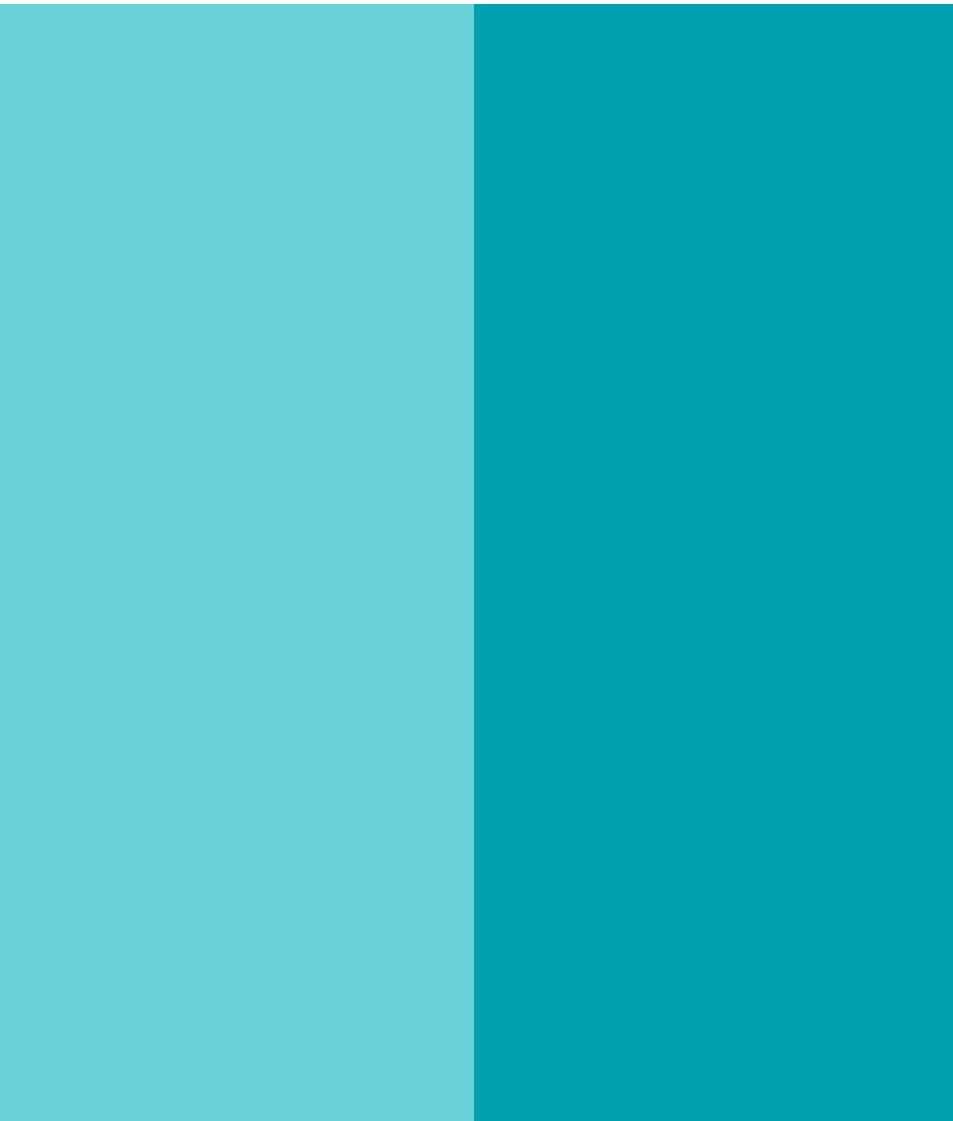# Monitoring integrity in public organisations

# Monitoring integrity in public organisations

# Contents

# Introduction

## Integrity in the public sector

The public sector in New Zealand is entrusted with wide-ranging powers. It is responsible for providing essential services that impact the lives of communities, hapū, iwi, whānau, families, and individuals.

People who access public services are directly affected by the integrity of the public organisations they engage with. It is important that public organisations demonstrate a genuine commitment to caring for, and upholding the dignity of, the people they serve.

Integrity in the public sector is not just an individual responsibility – it is a collective effort that extends through every level of an organisation. Everyone working in the public sector contributes to its overall integrity through their words, decisions, and actions.

This guide is designed to help you think about how to approach monitoring organisational integrity – how to do it effectively and in a way that adds value to your organisation. It is intended to complement work that you might already be doing as part of your strategy to improve organisational integrity.

## Organisational integrity

Organisational integrity is the culmination of an organisation's collective actions in legitimately pursuing its purpose for the public good.

To maintain public trust and confidence, public organisations need to operate with honesty and treat people fairly in all their activities, while being accountable, transparent, and accepting responsibility for their actions. Integrity also means that organisations need to base relationships on mutual trust, respect, and care.[1]

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1    These reflect the five values in the Public Service Act 2020. They are also commonly expected of public organisations in other countries. See, for example, Denhardt, J V and Denhardt, R B (2015), *The new public service: Serving, not steering* (4th edition), and the United Kingdom guidance "The seven principles of public life" (also known as the Nolan principles) at gov.uk.

## Using this guidance alongside the integrity framework

Throughout this guide we refer to the integrity framework, which we set out in *Putting integrity at the heart of how public organisations operate.*[2] The integrity framework serves as a foundational resource for understanding and embedding integrity in public organisations, and it complements this guide.

The integrity framework provides essential context on the broader ethical principles, leadership responsibilities, and cultural factors that shape integrity practices. We encourage readers to refer to the integrity framework for deeper insights about organisational integrity.

This guide outlines five practices for monitoring organisational integrity. They are:

**Strengthen organisational connections**

**Use a diverse range of meaningful integrity indicators**
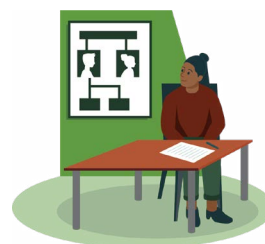
**Ensure clear accountabilities for your integrity monitoring programme**

**Commit to continuous monitoring**
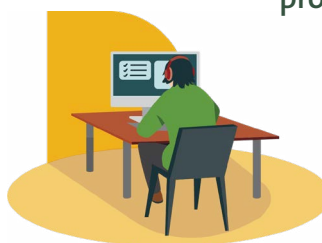
**Collect and use data responsibly**

We explore each of these five practices for monitoring organisational integrity in their own section. We have also included case studies and quotes throughout this guide to illustrate good monitoring practices.

2    See Controller and Auditor-General (2024), *Putting integrity at the heart of how public organisations operate: An integrity framework for the public sector – second edition*, at oag.parliament.nz.

# Monitoring organisational integrity

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Monitoring organisational integrity helps public organisations maintain high standards and continue to build and retain public trust. The public has more confidence in a public organisation when they see that it consistently upholds high ethical standards.

Organisational integrity is not just about complying with rules – it is about aligning every action with your organisation's purpose and values. You can find more information on how an organisation's purpose and values are foundational to its integrity practices in Part 3 of *Putting integrity at the heart of how public organisations operate*.

Monitoring organisational integrity can:

- help organisations identify potential risks early and take appropriate action to mitigate them – taking a proactive approach to risk mitigation can prevent small issues from becoming significant problems;[3]
- support a more ethical organisational culture and encourage ongoing conversations about ethical standards and behaviours, which can help to foster an environment where integrity is valued and upheld;
- support organisational learning and continuous improvement by providing valuable data and insights that can be used to enhance policies, procedures, and practices, which can help the organisation adapt to new challenges; and
- improve transparency through regular reporting and feedback mechanisms – the data gathered from monitoring organisational integrity can inform decision-making processes, helping to make sure that decisions are aligned with organisational values.

It is important to recognise that the process of monitoring organisational integrity can significantly affect an organisation's culture. The methods used, the areas of focus, and the way results are communicated can all influence how employees perceive and engage with the organisation's approach to ethical conduct.

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3    See Australian Public Service Commission (2022), *Integrity Metrics Resource*, at apsc.gov.au.

# Laying the groundwork for effective monitoring

Monitoring organisational integrity is not a standalone activity – it is the next logical step after an organisation has carefully considered its integrity risks and prepared a comprehensive integrity strategy.

Implementing an integrity framework is a good place to start if your organisation is getting started assessing its integrity. It can help with the important foundational steps needed before starting to monitor organisational integrity. These steps include:

- identifying your organisation's integrity risks; and
- developing an integrity strategy.

# Identifying your organisation's integrity risks

Integrity risks can take many shapes and forms, ranging from overt issues like fraud and bribery to more insidious behaviours like failing to follow up on commitments, disregarding organisational values, or excluding diverse perspectives. While overt issues are more likely to grab headlines, the more insidious behaviours are often more common and, over time, can corrode organisational culture and public trust.

Integrity risks can start small – as behaviours or decisions that might not seem significant at first. Left unchecked, however, they can escalate into larger problems that are harder to resolve. For example, an organisation that routinely overlooks minor breaches of its code of conduct might create an environment where more severe violations are tolerated.

Thinking about and documenting the integrity risks your organisation faces is an important step. This requires a close look at both internal and external factors:

- **Internal risks** (for example, bullying, harassment, non-compliance with policies, or failure to act in alignment with organisational values).
- **External risks** (for example, receiving gifts and hospitality, or inappropriate supplier relationships).
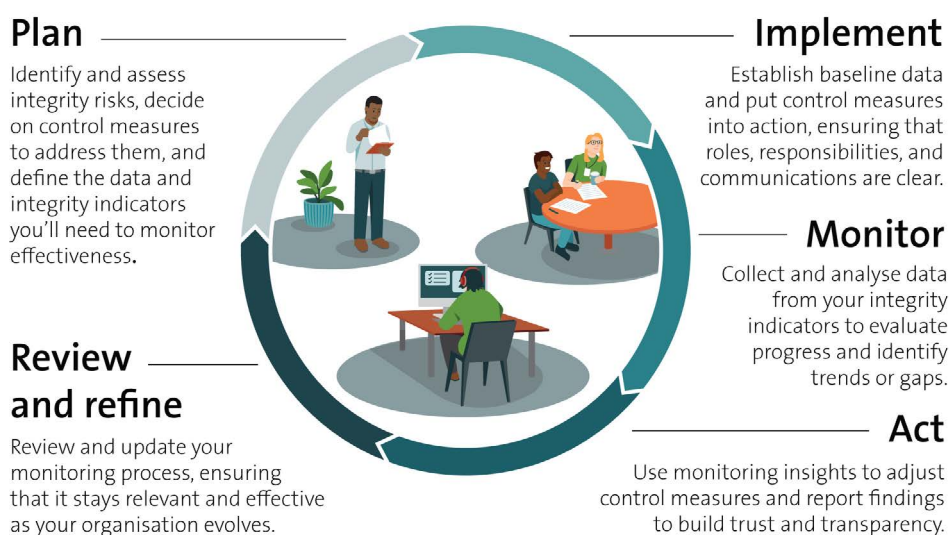
# Developing an integrity strategy

When your organisation's integrity risks have been identified, the next step is to develop a strategy for managing them.

An integrity strategy is a structured approach that guides an organisation's efforts to uphold ethical practices and maintain trust. It is a comprehensive plan that outlines an organisation's identified integrity risks and establishes processes to mitigate and respond to those risks in a consistent way.

An integrity strategy is a key part of creating an environment where people understand the importance of integrity and feel confident that the organisation values ethical decision-making and actions. It helps provide the tools and support necessary to ensure that integrity is not just a concept, but a practical and visible part of everyday operations.

An effective integrity strategy is the foundation of an integrity monitoring programme. It helps ensure that your organisation has the structures, processes, and cultural alignment needed to monitor integrity effectively.



**Plan**
Identify and assess integrity risks, decide on control measures to address them, and define the data and integrity indicators you'll need to monitor effectiveness.

**Implement**
Establish baseline data and put control measures into action, ensuring that roles, responsibilities, and communications are clear.

**Monitor**
Collect and analyse data from your integrity indicators to evaluate progress and identify trends or gaps.

**Review and refine**
Review and update your monitoring process, ensuring that it stays relevant and effective as your organisation evolves.

**Act**
Use monitoring insights to adjust control measures and report findings to build trust and transparency.

*"We have an internal audit programme that we use to detect integrity issues. It is not often that an integrity matter arises, but a fraud issue was recently detected during one of our audits. This was a good example of our internal audit programme in action. This detection allowed us to respond quickly and put measures in place that gave us greater oversight of the processes involved. It also prompted us to strengthen our process for pre-employment checks."*

Local authority integrity specialist

## Understanding integrity indicators

By using integrity indicators to monitor changes to your organisational integrity over time, you can begin to understand your organisation's ethical standing and track its progress.

Integrity indicators can include a mix of numerical data, narrative insights, and qualitative observations. By examining a range of integrity indicators, you can better understand changes in your organisational integrity and make informed decisions to improve ethical standards.

You can read more about integrity indicators in Part 2 of *Putting integrity at the heart of how public organisations operate*.

## Balancing approaches for effective integrity monitoring

To effectively monitor and maintain organisational integrity, it is important to balance compliance activities with an active approach to encouraging ethical behaviour. A well-balanced approach can enhance your integrity monitoring by making sure that neither approach is overly dominant.

**Compliance activities** are the processes, policies, and mechanisms used to make sure that people comply with an organisation's legal requirements and internal rules. These can be effective for managing unethical behaviour. For example, conflict of interest policies requiring regular declarations can help identify and address potential issues before they escalate. However, relying too heavily on compliance activities can lead to a narrow focus on rule-following, potentially overlooking the broader ethical considerations that should guide decision-making.

**An active approach to encouraging ethical behaviour** involves embedding integrity into everything your organisation does — from the day-to-day decision-making and behaviour of staff to its systems and practices. For example, integrating ethical considerations into procurement processes can help ensure that procurement decisions align with organisational values and foster trust with stakeholders. An active approach to integrity encourages people to consider the ethical implications of their actions and supports alignment between behaviours and your organisation's purpose and values.

You can read more about how compliance activities fit into a broader integrity approach in Part 2 of *Putting integrity at the heart of how public organisations operate*.

Monitoring integrity plays a key role in assessing whether your organisation has struck the right balance between these approaches. It can provide insights into what drives people to behave in certain ways and can help you to refine strategies to embed integrity practices in your organisation.

> *"In our organisation, we integrate hard measures of organisational integrity with an understanding of our organisational culture. We use the Committee of Sponsoring Organisations (COSO) Framework to carry out an annual assessment of our internal controls.[4] This includes components that relate to ethical leadership. Outcomes from our COSO Framework analysis are helpful because they provide a tangible idea of how effective our integrity measures are.*
>
> *"We also run engagement surveys to explore how employees feel about being listened to, how they feel they are contributing to our strategic direction, and their thoughts on leadership behaviour. We encourage regular conversations about performance agreements and alignment with organisational values throughout the year, rather than just once per year."*
>
> Local authority integrity specialist

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4    The COSO Framework is a system used to establish internal controls to be integrated into business processes. Collectively, these controls provide reasonable assurance that the organisation is operating ethically, transparently, and in keeping with established industry standards.

# 3 Developing an effective integrity monitoring programme

In this Part, we outline five practices that support an effective integrity monitoring programme.

These practices are guiding principles rather than specific measures or metrics. They are designed to help you approach integrity monitoring in a way that is thoughtful, structured, and tailored to your organisation's unique context.

## Five practices for an effective integrity monitoring programme

Strengthen organisational connections

Use a diverse range of meaningful integrity indicators

Ensure clear accountabilities for your integrity monitoring programme

Commit to continuous monitoring

Collect and use data responsibly

Each of these practices is explored in detail in the following sections, providing guidance to help you apply them to your organisation's integrity monitoring programme.

## Strengthen organisational connections

Effective monitoring goes beyond simply collecting and analysing data. You need a deep understanding of your organisation's context, which includes the human elements that shape your organisation's culture. Engaging with employees, promoting open dialogue, and building trust are essential to this process.

Strong relationships are essential at all levels of an organisation — between peers, across hierarchies, and within teams — to gather the information that effective monitoring practices need. Leaders set the tone for organisational integrity by modelling ethical behaviour and fostering trust. The behaviour of an organisation's leaders can significantly affect how people in the organisation perceive integrity.

You can read more about the impact of leadership on organisational integrity in Part 4 of *Putting integrity at the heart of how public organisations operate*.

Similarly, people responsible for monitoring organisational integrity need strong relationships with senior leaders and governors to effectively communicate integrity matters and address them appropriately. They also need to be approachable and trusted by staff — a lack of strong, trust-based relationships will limit your ability to gather the information you need to monitor integrity effectively.

*"We use the Hudson Safety Culture Model to understand our health and safety culture.[5] We also use the International Organization for Standardisation (ISO) to understand our progress in psychological health and safety. Our People & Culture Team do their best to track and monitor changes in these areas.*

*"Our 'speak up' processes are embedded into our approach to health, safety, and well-being. Psychological safety in particular is being embedded across the organisation, including in the leadership stream. In our view, speaking up isn't just about speaking up when you become aware of a serious issue, like fraud. We encourage our people to speak up about any concerns they may have, even minor ones."*

Local authority integrity specialist

5    The Hudson Safety Culture Model (or Hudson Ladder) plots the development of an organisation's safety culture.

## Use a diverse range of meaningful integrity indicators

Because organisational integrity is an abstract quality that reflects ethical culture and behaviour within an organisation, it cannot be directly quantified. However, it can be inferred by examining aspects of organisational culture, metrics, and behaviours that reflect an organisation's integrity. These aspects – or "integrity indicators" – can provide insights into how integrity manifests within the organisation.

Using a diverse range of integrity indicators can help you to get a more comprehensive understanding of your organisation's integrity. This can help you to make sure that your monitoring processes capture data that is directly measurable, as well as data that provides insight into underlying cultural influences.

*"We have talked about organisational integrity in our agency for quite some time, but we have only recently started to identify suitable integrity indicators and carry out monitoring activities.*

*"We wanted to understand how our people felt about the ways we work as an organisation. In particular, we wanted to understand whether there was a difference between how our senior leaders view our ways of working compared to how staff view our ways of working.*

*"We ran online and in-person workshops to gather data from our people about the way we work. The workshops involved participants rating our organisation against statements about ways of working (for example, how effectively our organisation is aligned with its vision, values, and expected behaviours and how inclusive our workplace culture is). Participants also had the opportunity to provide comments on why they chose a particular rating.*

*"When we analysed the results, we noticed that there were some differences between how our senior leaders view our ways of working compared to how our staff view our ways of working. We also noticed that the comments made were aligned with the results of our most recent staff survey.*

*"Something that came up as a theme was that our people felt that raising concerns could be easier. We will be putting training in place for people leaders over the next 12 months, which will include developing skills in building relationships and trust with staff."*

Non-public service department senior leader

**Select meaningful integrity indicators**

When thinking about the integrity indicators to include in your monitoring processes, it is important to consider what makes an integrity indicator meaningful. You need to have a good understanding of your organisation's culture and the context that it operates in.

For any integrity indicator you select, there should be a balance between precision and practical measurability. Think about the metrics that can be plausibly measured in your organisation, then consider what insights these metrics can provide about individual, organisational, and professional integrity.[6]

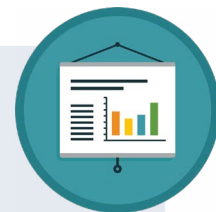**What is a meaningful integrity indicator?**

A meaningful integrity indicator is one that can provide information to reliably indicate trends in organisational integrity – whether it is improving, deteriorating, or maintaining.

Consider a scenario where the number of code of conduct breaches over a six-month period drops from an average of 10 to zero.

This might indicate that there has been an improvement in integrity because there were no breaches over the reporting period. However, it could also indicate that breaches are not being reported effectively because of:

- human error (such as individuals forgetting to submit reports);
- an issue with organisational culture (such as intimidation leading to breaches not being reported);
- a problem with technology (such as online reporting forms not functioning properly); and/or
- a problem with the reporting process (such as a change to the process that has caused a lag in the visibility of reports).

Having a clear understanding of the organisational context that a data point is found in can help you determine whether it is relevant and reliable for monitoring organisational integrity. Understanding your organisational context also helps you decide how to go about investigating the issue further.

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6    See David-Barrett, E and Zinnbauer, D (2022), "Measuring integrity for better understanding and tracking corruption", at iaca.int.

To select meaningful indicators to monitor organisational integrity, you need to carefully consider what each metric signifies in your organisation's context.

The following are some points to consider when selecting integrity indicators:

### Context
Understanding cultural nuances in your organisation can help you to make sure that the selected indicators provide meaningful insights. Contextual factors inside the organisation and its operating environment can affect the effectiveness of integrity indicators.

### Relevance
Integrity indicators should be directly related to the specific areas of integrity you aim to monitor. Indicators should be informed by your organisation's unique context (for example, compliance with regulations, decision-making, stakeholder relationships, or transparency in operations).

### Reliability
Integrity indicators should provide consistent and accurate data over time. Reliable indicators are more likely to provide information that you can depend on to inform decisions and track integrity trends.

### Actionability
Select indicators that can inform decision-making and that can give insights that lead to plausible actions. Indicators that do not directly lead to actions should still offer insights that support strategic planning and decision-making, helping to maintain and improve integrity within your organisation.

**Use indicators that provide a mix of quantitative and qualitative data**

Using a combination of quantitative and qualitative indicators provides a more complete view of integrity within your organisation.[7]

Quantitative data provides measurable and objective insights, while qualitative data offers context and depth, helping to understand the nuances behind the numbers.

**Quantitative data** can be used to assess trends in compliance metrics, such as the number of reported incidents, audit results, staff turnover, and survey scores. These data points can help measure changes in compliance over time and provide a partial picture of your organisation's integrity performance.

It can be easy to equate high levels of organisational compliance with high levels of integrity. However, quantitative data alone might not reveal the underlying causes of integrity issues or the cultural factors influencing behaviour. To see the full picture of organisational integrity effectively, you need to go beyond compliance and look at qualitative data to understand behaviours.

**Qualitative data** includes employee feedback, interviews, focus groups, and case studies. This type of data helps you to uncover the reasons behind certain behaviours and attitudes. It provides a richer understanding of your organisational culture and the reasons for changes in organisational integrity.

By combining integrity indicators that provide quantitative and qualitative data, you will be better able to:

- understand changes in organisational integrity over time;
- pinpoint areas for improvement; and
- develop plans for improvement.

*"Our agency uses a combination of quantitative and qualitative indicators for integrity monitoring. We gather quite a lot of data through our quarterly reports. This includes investigations, exit interview data, results from staff surveys, and speak-up notifications. We also gather anonymised information from employee support services to understand the underlying factors affecting workplace relationships."*

Government department integrity specialist



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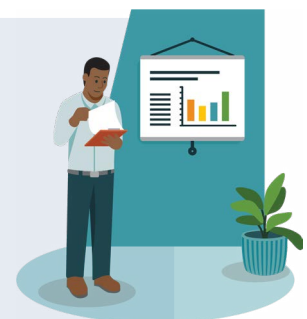
7    Van Dooren, W (2009), "Integrity in government: Towards output and outcome measurement", Organisation for Economic Co-operation and Development.

**Think about what the data tells you — and what it doesn't**

Most organisations use staff surveys to gather insights from their people. Surveys are useful because they can provide both quantitative and qualitative data. However, it is important to wassess what the data is telling you and whether it answers specific questions about organisational integrity and behaviour.

For example, consider a staff survey where 52% of respondents agree with the statement "Our organisation is transparent in its decision-making." Although this quantitative data indicates a majority agreement, it doesn't explain why 52% of people agree with the statement, the extent of their agreement, or why 48% of people disagree, didn't know, or didn't respond to the question.

In this example, the quantitative data provides an indication that further investigation might be needed. To gain a deeper understanding, qualitative data is essential. This data offers insights into the reasons behind people's views. Understanding the reasons behind the data can help you identify what things are working and what things you might need to change.

For example, if you want to understand why transparency in decision-making is perceived the way it is, you could:

- analyse a sample of decisions made over a specific period and look for areas where transparency could be improved;

- look for common themes about transparency in exit interviews;

- conduct a series of workshops or interviews that specifically focus on transparency; and/or

- carry out a follow-up survey focusing on transparency and provide space for written comments from respondents.
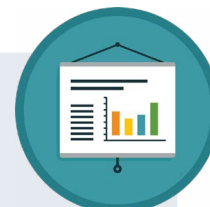
## Ensure clear accountabilities for your integrity monitoring programme

Effective monitoring needs clearly defined roles and responsibilities. Assign specific duties to individuals and teams so that everyone understands their part in the process.

**Assign clear roles and responsibilities**

The people you select to carry out monitoring should have strong analytical skills, cultural awareness, and the ability to engage with all employees. Effective communication and interpersonal skills are essential for gathering accurate and honest feedback.[8]

The people responsible for monitoring organisational integrity should also have strong connections with those in leadership and governance positions. These connections help to make sure that conversations about organisational integrity are sustained and that integrity-related insights inform decision-making.

Each group or individual should have clearly outlined responsibilities, whether it's collecting data, analysing trends, or implementing corrective actions. This helps to ensure that all aspects of monitoring are systematically addressed, preventing gaps and overlaps.

You can read more about the importance of clear roles and responsibilities for organisational integrity in Part 4 of *Putting integrity at the heart of how public organisations operate*.

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8    See Fréchette, P and Warah, A (2020), *Auditing organisational culture in the public sector,* Canadian Audit & Accountability Foundation, at caaf-fcar.ca.

**Dedicate resources to your integrity monitoring programme**

Creating a formal structure to monitor organisational integrity – such as a committee, working group, or an integrity team – can also help co-ordinate efforts and give monitoring the appropriate priority. Any groups tasked with monitoring integrity should include representatives from different parts of the organisation to provide diverse perspectives and comprehensive oversight.

*"In our agency, there are a lot of integrity matters to think about. These include internal workplace matters, integrity risks with the services and regulatory functions we are responsible for, and ongoing relationships with third party vendors.*

*"Integrity practices were present in our agency, but our integrity and compliance monitoring activities were quite fragmented. This was partly because we didn't have dedicated leadership for organisational integrity.*

*"An important starting point for our organisational integrity work was creating a centralised integrity team. This ensured that we had dedicated resource to focus on integrity in our organisation.*



*"One of the first things our integrity team was tasked with was carrying out thorough risk assessments. This involved breaking down siloed approaches to risk management and focusing on top risks (for example, procurement processes, conflicts of interest, and the handling of sensitive information). Having a centralised integrity function made it much easier to identify key integrity risks in these areas.*

*"Having a centralised integrity function in place allowed us to prioritise and allocate resource more effectively, informed by our knowledge of risks and incidents. This approach increased the risk and assurance maturity of the organisation and helped inform changes to make our processes more integrated and user-friendly."*

Crown entity integrity specialist

**Communicate the value of monitoring organisational integrity**

Integrity issues should be recognised as critical to your organisation's success and given attention at the highest levels of leadership. This is important because it integrates ethical considerations into strategic decision-making, enhances public trust, and ensures that integrity initiatives can be sustained.

However, elevating the status of monitoring can be challenging. Securing buy-in from leaders and decision-makers might need a shift in organisational culture.

Leaders should actively engage in and support integrity efforts, and everyone in the organisation has a role in reinforcing this commitment. Effectively communicating your monitoring activities can help to reinforce the importance of improving organisational integrity. Effective communication includes:

- presenting data and insights in a way that resonates with the recipient – for example, by linking integrity risks and trends to possible impacts on operational effectiveness;
- emphasising how monitoring aligns with your organisation's strategic objectives and long-term goals;
- sharing examples of where integrity initiatives have led to significant improvements from within your organisation or from other organisations; and
- framing integrity reporting in the context of your organisation's purpose and values to highlight the intrinsic value of integrity beyond compliance and risk management.

*"We put in place ongoing monthly conversations at the senior leadership level to reinforce ethical practices, especially after the disruptions caused by the Covid-19 pandemic. In our organisation, discussing integrity issues regularly is valued highly. We incorporate these discussions into our quarterly meetings as well."*

Government department integrity specialist

## Commit to continuous monitoring

Monitoring organisational integrity is not a one-time activity but an ongoing cycle that enhances your understanding of organisational integrity over time. The more frequently and effectively you monitor, the better you can understand how integrity in your organisation changes.

Understanding the impact of interventions to improve integrity is essential – you should plan integrity interventions with evaluation and monitoring in mind.

**Determine a suitable time frame for monitoring**

Regularly collecting data allows you to monitor trends in integrity performance over time. This supports benchmarking and evaluation of integrity performance against previous levels. It also helps to make sure that monitoring remains an ongoing priority and that any issues are promptly identified and addressed.

More frequent monitoring might be needed for high-risk areas or critical indicators. This allows you to rapidly detect and respond to integrity breaches. For other areas, quarterly or biannual reviews might be enough to track progress and identify trends.

A balanced approach to monitoring includes both short-term and long-term perspectives. Combining short-term and long-term monitoring gives you a holistic understanding of integrity within the organisation.

*"Our agency wanted to move away from a compliance-based approach towards a culture that integrated integrity into everyday practices.*

*"We developed a communication plan, leveraging the support of our senior leader to reinforce the importance of integrity. We also held competitions and provided recognition for teams excelling in integrity practices and used external examples to illustrate the importance of integrity and the consequences of lapses.*

*"In our agency, it is important that we can recruit people with experience in the public sector as well as hands-on experience in the industry. Having people who understand the industry, with experience working for industry contractors, is a strength. However, it gives rise to integrity risks from conflicts of interest. We have to protect our people from this risk — not just our Board and executives but everyone.*

*"Continuous monitoring and awareness of organisational integrity has been key for us in this area. As part of our monitoring, we talked to a lot of our people about conflicts of interest, and many would say that they don't have any. This prompted us to change the language of our policy from a Declaration of Conflicts Policy to a Declaration of Interests Policy. Our priority is that our people disclose everything so that we can protect them. We have been clear that the obligation is to declare all interests — including relationships."*

Crown entity integrity specialist

## Collect and use data responsibly

Public sector organisations must handle data with the utmost care to protect security and privacy, maintain trust, and uphold ethical standards.

By protecting the mana and integrity of data, organisations can foster a deeper level of trust and engagement with their stakeholders.

**Use data with care**

Public sector organisations must comply with all relevant data protection and privacy laws. Ensuring legal compliance not only protects the organisation from legal repercussions but also demonstrates a commitment to ethical standards.

Using data responsibly involves protecting data – but also making sure that you use it ethically and effectively to inform decision-making and promote integrity.

In many cultures, data is not just information. It carries significant cultural and personal importance. In Māori culture, data can be considered taonga, and its protection is paramount.

To respect and protect the mana of data, you should:

- recognise and respect the cultural significance of the data and engage with cultural advisors to align your data practices with cultural values where appropriate;
- collect, store, and use data in ways that honour your legal obligations and the trust that individuals and communities have placed in your organisation; and
- act as ethical stewards of the data, recognising its importance and handling it with the highest level of integrity and respect.

**Part 3**
Developing an effective integrity monitoring programme

**Maintain staff trust and confidence**

Maintaining staff trust and confidence is essential for monitoring to be effective. Staff are more likely to engage with integrity processes when they trust that their data will be used responsibly and not punitively.

In an organisation where employees feel safe to report issues, the data collected to monitor organisational integrity is more likely to be accurate and comprehensive. Having processes that are trustworthy and supportive can help make sure that employees provide honest and detailed feedback. High levels of staff engagement can also lead to richer data and more insights, improving the quality of monitoring.

Organisations with high levels of integrity take the feedback they receive seriously and act on it in a way that is visible to employees, leading to continuous improvement. When employees see that their feedback leads to meaningful changes, they are more likely to continue participating in integrity initiatives.

Use the data you collect to identify areas for improvement and support a positive organisational culture. Provide clear assurances that individual data will be kept confidential and used solely for integrity purposes. This can encourage more open and honest reporting from staff.

*"We consider all data as taonga and some data tapu. Our staff are passionate about their work, and we have focused on translating this passion into better data practices. We make sure that data is handled responsibly and ethically, including securing data and maintaining privacy. This approach has enhanced trust and integrity within the organisation."*

*Public sector trust senior leader*
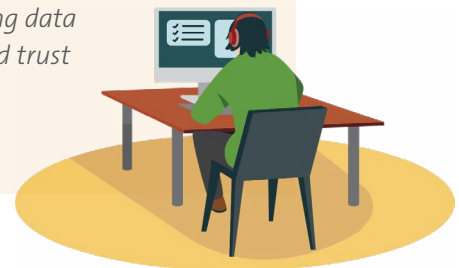
# 4 Approaches for monitoring organisational integrity

There is no single right or wrong process for monitoring organisational integrity. Because each organisation is different, what works best for one organisation might not be effective for another.

As you gather more data and deepen your understanding of integrity in your organisation, your integrity monitoring programme is likely to evolve. Over time, you might find that you need different approaches to monitoring as your organisation's integrity practices mature. It is important to be flexible and remain open to continuous improvement through feedback and iteration.

## Start simple and build over time

Monitoring organisational integrity isn't all or nothing – it can be built up over time. It might feel unfamiliar or different from other governance activities, but what is important is to begin.

All public organisations are unique in their context and operating environment, so different public organisations might approach monitoring in different ways. Integrity indicators that provide rich data for one organisation might not provide relevant insights for another.

Over time, you might find that some indicators are less effective than you expected. You might also find that new areas of focus emerge and that you need to adjust your data collection and monitoring practices.

Additionally, all public organisations are at different stages in their maturity in monitoring integrity. The goal should be managing integrity over the long term rather than implementing a comprehensive programme immediately.

The approaches we set out and the examples we include in this Part are not designed to be followed to the letter. Rather, we present them to encourage thinking and discussion. You should tailor them, combine elements, or use alternative approaches based on your organisation's unique circumstances.

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# Carry out a data review

A place to start is to review the data that is already available within your organisation. This involves taking stock of existing data sources to build an understanding of what aspects of integrity you are already monitoring and where gaps might exist. Many organisations already collect useful data for operational or compliance purposes that could serve as integrity indicators (for example, incident reports, audit results, and employee feedback).

Understanding what data is available in your organisation means you can compare it against the integrity risks that have already been identified for your organisation. This process can help create a matrix of information to identify where you might need to monitor additional integrity indicators and where data gaps could present integrity risks.

Reviewing these data sets can help to identify which areas of integrity you are already tracking, where you might need additional indicators, and how different parts of your organisation contribute to your overall monitoring of integrity. Different teams might collect data that is relevant but is not centrally shared or analysed, so this process could also involve bringing together different parts of your organisation to share information.

A data review could include commonly available information, such as:

- the number and type of complaints raised through whistleblowing mechanisms;
- themes from exit interviews relating to organisational culture and behaviours;
- internal audit findings on compliance with policies or procedures;
- patterns in staff turnover, particularly in high-risk areas;
- results from employee engagement surveys focused on workplace culture and behaviour; and
- investigations into conflicts of interest or procurement practices.

For example, data collected from staff exit interviews and employee engagement surveys might give an indication of:

- common themes relating to staff satisfaction or dissatisfaction with organisational culture, such as issues with leadership transparency or workplace fairness; and
- patterns of turnover in specific teams or departments, which might point to areas where integrity-related challenges are present.

Alternatively, a review of audit findings and complaints raised through whistleblowing mechanisms could indicate:

- areas of non-compliance with internal procedures, which might reflect broader cultural issues within your organisation; and

- the frequency and nature of reported incidents, providing a snapshot of how effectively certain integrity mechanisms, such as reporting systems, are functioning.

Through this review, you might identify gaps – for example, that you lack qualitative data on the reasons behind staff turnover, or that you do not monitor certain high-risk areas enough. These gaps could inform your selection of additional integrity indicators to provide a more holistic view of organisational integrity.

Over time, you might look to refine your integrity indicators to adapt to new risks or emerging trends so that your monitoring programme evolves as your organisation's integrity practices mature.

## Carry out a 'deep dive' into an existing process

Carrying out a 'deep dive' into an existing process involves thoroughly examining a familiar procedure to uncover existing data that you could use for integrity indicators. The approach can provide valuable insights into a process without the need to develop extensive new systems for collecting data.

What might initially appear as a single data set – such as code of conduct compliance records – can actually be a rich source of information when examined more closely. Patterns and trends might emerge from a deep dive into the data available from code of conduct reports that you can use to identify areas of concern or track changes in organisational integrity.

For example, data collected from code of conduct compliance reports will often give an indication of:

- **the total number of reports over a period** – tracking the number of reports about code of conduct breaches might indicate how engaged with, and aware of, conduct issues employees are and how closely they follow the code of conduct; and

- **the types and seriousness of reports** – categorising reports by type (for example, harassment and fraud) and severity might help you identify prevalent issues and high-risk areas in your organisation.

However, analysing the available data more deeply could provide additional insights into:

- **the culture of reporting** – tracking the number of reports by business area might indicate a strong reporting culture in some areas of the organisation and areas where conduct breaches are not being reported as effectively;

- **the number and types of investigations** – monitoring the number and nature of investigations you launch can provide insights into the prevalence of particular issues and where you might need to focus attention;

- **the appropriateness of investigation outcomes** – evaluating the results of investigations can indicate the effectiveness of your organisation's investigative processes and whether they lead to appropriate resolutions;

- **the timeliness and efficiency of investigations** – tracking how long investigations take can indicate procedural efficiency and responsiveness, which are important for maintaining trust; and

- **the suitability of investigation resource** – analysing whether investigations are adequately staffed and resourced might provide insights into the efficacy of investigations and the workloads of team members.

The data from a deep dive into a process might highlight issues that require further exploration. For instance, if you discover that investigations into code of conduct breaches are taking longer than expected, you might need to turn to other integrity indicators to understand why this is happening. This could involve adding a new integrity indictor to your monitoring programme to gather data to help you understand the factors that impact the process, such as staff training or procedural bottlenecks.

## Focus on key organisational values

Another approach to monitoring integrity is to focus on a visible demonstration of integrity within your organisation, such as being transparent, accountable, and fair. Many organisations prioritise these values, and they can provide a useful starting point for identifying integrity indicators.

By selecting a key value, you can tailor your integrity monitoring practice to focus on behaviours and practices that demonstrate how your organisation is upholding that value.

**Engage staff in your approach to monitoring organisational integrity**

Focusing on organisational values provides an opportunity to engage staff in your integrity monitoring programme.

Staff often have direct insights into how they experience organisational values in their day-to-day work. Gathering input through surveys, focus groups, or informal discussions can help to identify relevant integrity indicators that leadership might not have initially considered.

For example, if accountability is a central value for your organisation, you could monitor integrity indicators that focus on how decisions are made, communicated, and owned by these responsible. For example:

- **The quality of accountability mechanisms**: Feedback on how frequently and thoroughly decision-makers communicate the rationale behind their decisions can provide insight into how transparent and accountable leadership is in practice.

- **The impact of restorative actions**: Monitoring whether corrective actions are taken in response to performance issues or concerns raised (and the efficacy of these actions) might help to indicate changes in perceptions of accountability over time.

- **Follow-through on commitments**: Tracking the percentage of formal commitments made that are delivered on time and as expected might indicate the level of collective accountability within the organisation.

- **Perceptions of leadership accountability**: Monitoring results from surveys or interviews that ask staff and stakeholders how they feel about accountability in decision-making can provide insights into how accountability in leadership is viewed.

Alternatively, if your organisation focuses on investing in relationships, it might be valuable to look at integrity indicators that monitor how well relationships are built and maintained. For example:

- **Frequency of engagement opportunities**: Evaluating the number of formal and informal engagement opportunities between leadership, staff, and external stakeholders can provide insights into how effectively your organisation is nurturing relationships.

- **Frequency and effectiveness of collaboration**: Monitoring the frequency, progress, and success of cross-departmental and cross-agency projects or initiatives can reveal the extent that different areas of your organisation are building and maintaining strong working relationships.

- **Investment in relationship-building resources**: Tracking organisational investment in resources for relationship-building activities (for example, team building, community engagement, or staff well-being programmes) might provide an indication of your organisation's long-term commitment to maintaining strong relationships.

- **Uptake of development and support initiatives**: Monitoring the usage of mentorship programmes or membership of employee-led networks can provide some understanding of how effectively your organisation builds and maintains staff relationships.

# Report what you do and what you find

Transparency in monitoring processes builds trust within the organisation and with external stakeholders. It is important to communicate your organisation's commitment to integrity and the measures you are taking to monitor and uphold ethical standards.[9]

Regularly reporting on monitoring activities and findings is important to maintaining transparency. This can include internal reports to senior leadership and staff, as well as external reports to stakeholders and the public. Reports should highlight key findings, trends, and any actions that you have taken in response to integrity issues.

> *"We implemented a system for collective integrity reporting across the organisation. Quarterly reports are prepared by our Professional Standards Team. We include information about incidents, including details about what type of incidents are being investigated and the stage each investigation is at.*
>
> *"We present all the data we gather as a dashboard using a data visualisation tool. Teams across the organisation then analyse the data – the teams involved in the analysis are our Professional Standards, Security, HR, and Integrity teams. They work together to collate the information and provide a report to senior leadership about what has been happening over the last quarter. The report consists of the dashboard along with an accompanying paper that expands on the data in the dashboard.*
>
> *"The data allows us to make informed decisions about integrity activities to focus on for the next quarter. We have been gathering data like this for about five years, so it also allows us to go back and look at changes in our integrity performance over time."*
>
> Government department integrity specialist

9    Lamboo, T and Hoekstra, A (2015), "The Netherlands: Developments in Monitoring Integrity in Public Administration", in Netherlands Ministry of the Interior and Kingdom Relations (2015), *Prime witnesses? Case studies of staff assessments for monitoring integrity in the European Union*, page 65.

Reporting the outcomes of your monitoring to stakeholders can build trust and enhance the credibility of your monitoring. This should include being transparent and open about things that didn't go well and reporting this information clearly.

Engaging stakeholders can help ensure that your monitoring practices are transparent and that they respond to the community's needs and concerns.[10] Consider forming advisory panels with representatives from key stakeholder groups or holding public forums to discuss integrity initiatives and gather feedback.

## Review and revise your monitoring programme

Regularly reviewing and revising your monitoring practices is essential for them to remain effective and relevant. This involves:

- assessing the effectiveness of your current monitoring activities;
- identifying areas for improvement; and
- updating your practices to reflect new insights, emerging risks, and changes in organisational priorities.

A proactive approach to reviewing and revising your monitoring programme helps maintain the responsiveness of your monitoring efforts.



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10  United Nations Development Programme (2023), *Integrity and Ethics Agency Improvement Framework*, at undp.org.

**The Australian National Audit Office (ANAO) Integrity Framework and Report 2022-23** is a good example of effectively reporting and communicating organisational integrity outcomes.[11] The report does more than just list achievements. It provides context for how these outcomes were reached and offers a clear view of what it has accomplished and what still needs attention. This balanced approach helps to make sure that readers get a comprehensive picture of both successes and ongoing challenges.

The report also integrates performance metrics with strategic plans. By showing how the results of monitoring activities inform future actions, the ANAO demonstrates that it has a dynamic approach to performance management. This alignment between data and planning helps to provide assurance that integrity activities respond to new challenges.

The report also emphasises accountability and details who is responsible for implementing the next steps. This not only enhances the report's credibility but also clearly demonstrates that the ANAO follows through on the commitments it has made.

Finally, the report highlights a strong commitment to engaging with stakeholders. By explaining how the ANAO will involve different parties in its future steps, the report fosters a sense of shared responsibility and openness. This inclusive approach not only strengthens the ANAO's integrity practice but also builds broader support for its initiatives, making everyone feel part of the journey.

11  Australian National Audit Office (2023), "ANAO Integrity Framework and Report 2022–23", at anao.gov.au.

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