Public Integrity Indicators

Quality of Strategic Framework

Principle 3 (Strategy) of the OECD Recommendation of the Council on Public Integrity

Quality of strategic framework

An evidence- and risk-based strategic approach is essential for mitigating public integrity risks. The strategic framework should have adequate coverage, and consist of strategies that are developed based on data and evidence, in an inclusive manner, adequately implemented and evaluated, and financially sustainable.
The indicator does not assess the relevance and impact of individual strategies, but the strategic framework for the public integrity system.

Indicators	Values
1. Coverage of strategic framework	X/7
2. Evidence-based problem analysis and use of diagnostic tools	X/3
3. Minimum contents in public integrity strategies	X/4
4. Inclusiveness and transparency of intergovernmental and public consultations	X/7
5. Adequacy of implementation structures and reporting	X/15
6. Implementation of activities	%
7. Financial sustainability	X/4
8. Transparency of evaluation practices and use in decision making	X/5

Indicator 1: Coverage of strategic framework
Review of strategies related to public integrity (public integrity strategies), provided by national authorities. One or several strategies can constitute the strategic framework. Strategies must be adopted at the level of the Government (Council of Ministers or equivalent) and in force. Objectives must be primary objectives (first-level objectives).
The following criteria are part of this indicator:
1. Strategic objectives are established for mitigating public integrity risks in human resource management, including violations of public integrity standards.
2. Strategic objectives are established for mitigating public integrity risks in public financial management, including reducing fraud and financial mismanagement.
3. Strategic objectives are established for mitigating public integrity risks in internal control and risk management.
4. Strategic objectives are established for mitigating public integrity risks in public procurement.
5. Strategic objectives are established for reducing fraud and other types of corruption across the public sector.
6. Strategic objectives are established to mitigate public integrity risks in the private sector, public corporations, state-owned enterprises, or public-private partnerships.
7. Strategies for any of the following sectors have at least one primary objective aimed at mitigating public integrity risks: (a) infrastructure, (b) housing, (c) health, (d) education, (e) taxation, (f) customs.[1]

Indicator 2: Evidence-based problem analysis and use of diagnostic tools
Review of the evidence and data sources used for strategy development, either referenced in the strategies themselves or background materials provided by the national authorities, for the public integrity strategies identified in indicator 1.
The following criteria are part of this indicator:
1. Within the last five years, an inter-institutional body has prepared and published an analytical report on public integrity risks that formulates recommendations and sets priorities for the whole public integrity system.
2. Each existing strategy is based on an assessment of public integrity risks, identifying as a minimum specific types of relevant integrity breaches, the actors likely to be involved, as well as the expected likelihood and impact if the risk materialises.
3. Each existing strategy refers to at least 4 out of the following 8 sources of information related to public integrity: (a) indicators from international organisations or research institutions, (b) employee surveys, (c) household surveys, (d) business surveys, (e) other survey data, such as user surveys, or polls from local research institutions, (f) data from public registries (e.g. law enforcement, audit institutions, national statistics office), (g) published research documents from national or international organisations or academia (e.g. articles, reports, working papers, political economy analysis) and (h) commissioned research.

[1] This is not an exhaustive list of sectors vulnerable to integrity risks but the sectors included are all relevant and universal, and generally account for a large proportion of government expenditure. The selection was done in consultation with officials from the OECD Working Party of Senior Public Integrity Officials and external experts.

Indicator 3: Minimum content in public integrity strategies
Review of the public integrity strategies that quality for indicator 1.
The following criteria are part of this indicator:
1. All strategies include a situation analysis, including identification of existing public integrity risks.
2. All strategies contain outcome-level indicators for the public integrity objectives.
3. All strategies set target values for all outcome-level indicators.
4. At least one strategy refers to at least one international legal instrument relating to public integrity.

Indicator 4: Inclusiveness and transparency of intergovernmental and public consultations
This indicator measures the extent to which public integrity strategies are consistently developed inclusively and transparently. The methodology is based on a review of the regulatory framework for consultation processes and review of practice. National authorities are asked to provide reference to the applicable regulations and provide documentary evidence for consultation practices from public registers. The criteria below are based on the 2012 *OECD Recommendation of the Council on Regulatory Policy and Governance*[2] and the *United Nations Convention against Corruption*.[3]
The following criteria are part of this indicator:
1. A minimum duration of at least 2 weeks for inter-governmental and public consultation period is established in legislation.
2. The public consultation portal contains the draft strategy, including all supporting relevant materials.[4]
3. All public integrity strategies in force have undergone mandatory inter-governmental and public consultation processes.
4. At least one public integrity strategy has undergone an extended consultation process.
5. At least one key integrity body[5] has been consulted and provided inputs through the regular intergovernmental or public consultation procedures to at least one of the existing public integrity strategies.
6. At least one non-state actor has been a member of a working group mandated to develop or amend public integrity strategies in force.
7. The public consultation portal contains a summary sheet for all draft strategies with responses to all submitted comments provided during the public consultation.[6]

[2] OECD (2012), *OECD Recommendation of the Council on Regulatory Policy and Governance*, OECD, Paris, https://www.oecd.org/gov/regulatory-policy/49990817.pdf

[3] The criteria are also aligned with UNODC (2015), *National Anti-Corruption Strategies: A Practical Guide for Development and Implementation;* and Council of Europe (2013), *Designing and Implementing Anti-Corruption Policies Handbook*.

[4] As a minimum, the concept document and risk analysis.

[5] For the purposes of this indicator, this includes (a) anti-corruption authority, (b) supreme audit institution, (c) public procurement authority, (d) central institution responsible for internal control; (e) ombudsperson institution, (f) ministriy(es) responsible for police, tax or customs authorities, or (g) prosecution or court administration.

[6] If there is no sheet because there are no comments, this is considered as evidence that the consultation process is not adequate.

Indicator 5: Adequacy of implementation structures and reporting
Review of the structures and responsible functions for the implementation of the strategy and its action plan. National authorities are asked to provide information on the implementation structures for each strategy and provide the action plans and monitoring reports. The criteria below derive from the United Nations Convention Against Corruption.[7]
The following criteria are part of this indicator:
1. For each strategy, there is a central coordination function responsible for coordinating the implementation, monitoring, reporting, and evaluation of the action plan.
2. All public integrity strategies have an action plan in force.
3. All action plans have dedicated outcome-level indicators, baseline targets and a list of activities that are all directly linked to a strategic objective currently in force.
4. All action plans identify lead organisations at least for each objective.
5. All action plans contain a section specifying the monitoring, reporting, and evaluation arrangements.
6. All action plans reference administrative data sources from existing public registries.[8]
7. At least one action plan includes data sources from staff, household, or business surveys.
8. At least one action plan includes activities to collaborate with institutions at the subnational level.[9]
9. All action plans are published as a minimum on the website of the responsible body.
10. Monitoring reports are published for all action plans, at least once a year, and publically available no later than 3 months after the defined reporting schedule.
11. All monitoring reports report on progress against pre-defined indicators and targets in the action plan.
12. All monitoring reports present the rate of implementation for activities in the action plan.
13. All monitoring reports draw conclusions and have a dedicated section with recommendations to management.
14. The responsible body(ies) have initiated consultations with relevant state administration bodies to discuss the monitoring report(s) during the latest full calendar year.
15. At least one responsible body has initiated consultations with the general public and/or civil society organisations on its monitoring reports during the latest full calendar year or the year prior to that.

[7] The criteria are also aligned with Council of Europe (2013), *Designing and Implementing Anti-Corruption Policies Handbook*.

[8] Examples include the human resource management information system, procurement database, audit reports, risk registers, court case statistics, law enforcement statistics, etc.

[9] Criterion 8 is not applicable where the Constitution restricts such activities.

Indicator 6: Implementation of activities (%)
The implementation rate of activities related to strategic objectives for public integrity, as presented in the monitoring reports provided by the national authorities. Activities that are ongoing, continuous or only partly implemented are excluded. The rate is presented for the latest full calendar year, or the preceding year, or the last full action plan period, whichever is the lowest. The lowest rate for any of the strategic objectives across all strategies is presented.

Indicator 7: Financial sustainability	
Review of action plans and/or budget documentation for public integrity strategies identified for indicator 1, provided by national authorities.	
The following criteria are part of this indicator:	
1.	All action plans include estimates for capital and operational expenditures.
2.	Additional costs are identified and a cost estimate is provided for specific activities.[10]
3.	Financial plans are multi-annual and linked with the medium-term expenditure framework.
4.	No funding shortfalls or budget reductions against the approved action plan have been reported by the implementing authorities or in the monitoring reports.

Indicator 8: Transparency of evaluation practices and use in decision making	
Review of evaluation reports for public integrity strategies identified in indicator 1. Predecessor strategies refer to any strategies preceding the ones currently in force. If no predecessor strategies exist then the criterion is automatically met.	
The following criteria are part of this indicator:	
1.	An evaluation report exists for all predecessor strategies.[11]
2.	All evaluation reports for predecessor strategies have been published online by the national authorities.
3.	Non-state actors were involved in the evaluation of at least one of the predecessor strategies, either as evaluators or as part of a formal review/quality assurance mechanism.
4.	Current strategies all have an end-of-term evaluation listed as an activity in their action plan.
5.	Current strategies have all used evidence from evaluations of predecessor strategies to inform their approach.[12]

[10] Additional costs are defined as expenditure that is not part of the regular budgetary resources, such as existing staff and premises.

[11] If no predecessor strategies exist criteria 1 to 3 and 5 are automatically fulfilled.

[12] As a minimum, reference to the evaluation report or use of the same data source is required as documentary evidence to fulfil this criterion.

Glossary

Extended public consultation process: Process for public consultation that uses additional means than those that are mandatory to engage citizens. Examples include open meetings with stakeholders (town hall meetings) and coordinated social media outreach.

Inter-institutional body: A public authority of permanent or temporary nature that has members from at least three central government bodies and/or oversight institutions. An example can be a joint task-force with members from different central government bodies and/or oversight institutions.

Internal control : Internal control refers to the organisation, policies and procedures used to help ensure that government programmes achieve their intended results; that the resources used to deliver these programmes are consistent with the stated aims and objectives of the organisations concerned; that programmes are protected from waste, fraud and mismanagement; and that reliable and timely information is obtained, maintained, reported and used for decision making. Internal control has been broadly defined by the Committee of the Sponsoring Organizations of the Tredway Commission (COSO – www.coso.org) as: "a process effected by an entity's management designed to provide reasonable assurance regarding the achievement of objectives in the following categories: (i) Effectiveness and efficiency of operations; (ii) Reliability of financial reporting; and (iii) Compliance with applicable laws and regulations.

Medium-term expenditure framework: A framework for integrating fiscal policy and budgeting over the medium-term (typically over a 3-5 year period). In general terms, this involves systematic linkages between (a) aggregate fiscal forecasting, (b) maintaining detailed medium-term budget estimates reflecting existing government policies, and (c) maintaining compliance with a normative fiscal framework. A key objective of an MTEF is to establish multi-year expenditure ceilings which are effective for the purposes of planning and prioritisation.

Non-state actors: Non-state actors designate organisations and individuals that are not affiliated with the government. These include civil society associations, universities and think tanks, media associations, corporations, business associations, trade unions, professional associations, private financial institutions, non-governmental organisations, and individual citizens.

Primary strategic objectives: Formal objectives set and adopted by the Government (Council of Ministers or equivalent) in official strategy documents or regulations that are not subordinate to any other objectives.

Public consultation: Structured public engagement which involves seeking, receiving, analysing and responding to feedback from stakeholders among the public. Public consultation gives citizens and business the opportunity to make an active input in regulatory decisions.

Public integrity: Public integrity refers to 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.

Risk management: A process to identify, assess, manage, and control potential events or situations to provide reasonable assurance regarding the achievement of the organisation's objectives.