

## Transparency International Anti-Corruption Helpdesk Answer

# Integrity trainings for public officials

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

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# Query

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

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## Introduction

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

## Main points

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

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corruption prevention in the public sector as part of a broader and comprehensive anti-corruption framework (OECD 2013: 9).

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

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

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

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

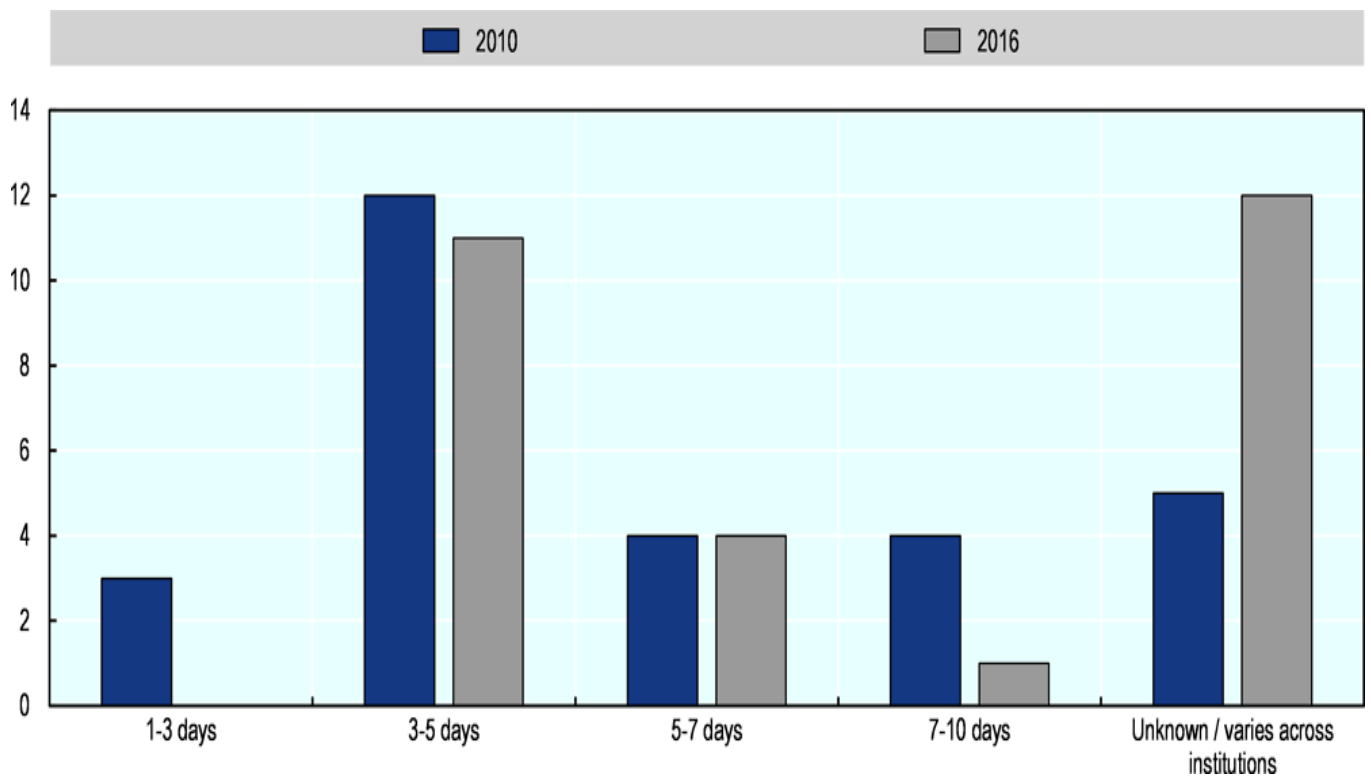
political economic context when designing capacity building measures (Poulaine 2018: 45). Further, having a realistic and effective sanctioning system is one of the important elements as well.

Consequently, trainings dealing with both duties and expectations of behaviour of public servants can be complemented with information on penalties imposed where these duties and obligations are flouted.

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

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

To achieve sustainable capacity building, integrity trainings should be regularly repeated, as well as tailored to the needs of specific target groups (OECD 2018: 40). Comparative evidence suggests that there is a limited time dedicated to integrity trainings considering the number of relevant topics for public sector that need to be covered. As shown in Figure 1, we can observe a decline in the number of governments that reported having trainings lasting 7-10 days. Limited resources are often an obstacle to providing a comprehensive coverage of integrity issues. However, modern training methods, which will be discussed in the following sections, may provide cost effective solutions to these challenges. Moreover, in the context of limited resources, governments can time trainings to coincide with important changes in ethics or public service regulations, codes of conducts, and so on. (OECD 2020).



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

## Areas of integrity trainings for public officials

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

### Codes of ethics and codes of conduct

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

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

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

### Conflict of interest rules and procedures

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

### Pre- and post-employment rules

Pre- and post-employment refers to the corrupt potential of the "revolving door". This term designated the movement of individuals between positions in public and private sectors, in either

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

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

## Receipt of gifts

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

## Avoiding nepotism

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

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

## Income and asset disclosure

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

## Supporting an open organisational culture

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

## Transparency in lobbying

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

## Ancillary activities

These [activities](#) refer to the incompatibility of offices. For example, the question of whether a public official can at the same time be the head of a private company. Integrity trainings in this context can address questions such as whether ancillary activities are allowed, when should they

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be prohibited, how to disclose them and when (Korupsioon.ee no date).

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

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

## Integrity trainings for public officials: Design considerations

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

- **Needs assessment.** To make trainings cost effective and targeted in light of limited resources, needs assessments can help to evaluate where the trainings are the most urgently needed. Surveys on integrity levels of public officials in different sectors can be useful in helping to assess the vulnerability of different parts of the public sector (see OECD 2013: 15). These surveys may help in identifying which aspects of public integrity need further strengthening through trainings (see OECD 2013).
- **Target group of participants/institutions.** Integrity trainings can be aimed at the sectoral level or at the general level training for public officials. One challenge here is that trainings may overburden employees, so a common practice is to provide induction trainings for new employees or trainings for senior staff who can then pass on the knowledge to their junior colleagues (OECD 2013; Luijken 2014).

- **Timing of integrity trainings and their duration.** These can be organised once a person starts to work in the public sector or as on-job trainings. In many countries, they are organised periodically (e.g. Code of Conduct or ethics trainings every year or every two years). The duration is dependent on available resources and means of delivery. Naturally, online trainings can last longer and engage more participants (Luijken 2014).
- **Training methods, techniques and means of delivery.** An OECD (2013: 19) report identified four typical methods of integrity trainings: conferences and lectures, seminars and workshops, interactive methods and case studies and internet-based training. In online learning platforms, for example, training materials, which may involve textual information, videos, exercises, are in a virtual space (e.g. e-learning platforms) (Luijken 2014). In many cases, countries opt for a combination of multiple methods. Tests are typically administered at the end of the trainings to assess the knowledge that participants obtained during the training. Existing evaluations of integrity and anti-corruption trainings provide some evidence that the “combination of participatory and interactive training components can greatly increase the degree to which participants engage with the training material” (Luijken 2014: 6).
- **Content of integrity trainings.** The previous section has outlined the key areas that can be addressed in integrity trainings for public officials. Broadly speaking, when it comes to the content of trainings, they can incorporate a legislative framework and values, and thus, be both legalistic and value oriented. For example, an OECD (2013) study on ethics trainings for public officials has identified the following laws and regulations present in integrity trainings:
  - civil service legislation,
  - conflict of interest law,
  - anti-corruption legislation,
  - administrative code,
  - public procurement law,



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- law on access to information,
  - criminal code.
- When it comes to values in the integrity trainings, they identified:

- impartiality,
- transparency,
- responsibility,
- legality,
- integrity,
- efficiency,
- equality,
- justice (OECD 2013: 22).

## Integrity trainings for public officials: examples of existing practice

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

### Austria

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

In general, these trainings are tailored more towards anti-corruption issues, but they contain some specific aspects related to integrity trainings:

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

BAK tends to be more focused on lectures. In 2020, it organised a number of lectures primarily targeted for the Federal Police Academy (SIAK), but also for civil servants in the public administration. Topics include:

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

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

- “Corruption prevention” within the project “Security partnership – Joining forces for security in Austria.” It is targeted to security officers to train them to correctly act in compliance specific matters. In terms of content, the module begins with a film on the phenomenon of corruption. The submodule titled “Practice-oriented case examples of maintaining contact between security officers and security partners” offers case study examples related to compliance:
  - general obligations of conduct,
  - lawful performance of duties,
  - partiality (BAK 2020: 33).
- “Criminal law on corruption, BFA” was organised as part of awareness raising measures for the Austrian Federal Office for Immigration and Asylum (BFA). The course provides case examples regarding criminal law on corruption and the topics include:
  - bribery in asylum procedures,
  - accepting of advantages in contact with interpreters,
  - disclosure of personal data in asylum processes (BAK 2020: 33).
- An e-learning module “Code of conduct of the Austrian Federal Ministry of Interior (MOI) – Our values. Our approach” is a valuable example as it provides content directly related to integrity issues. The course combines theory and case

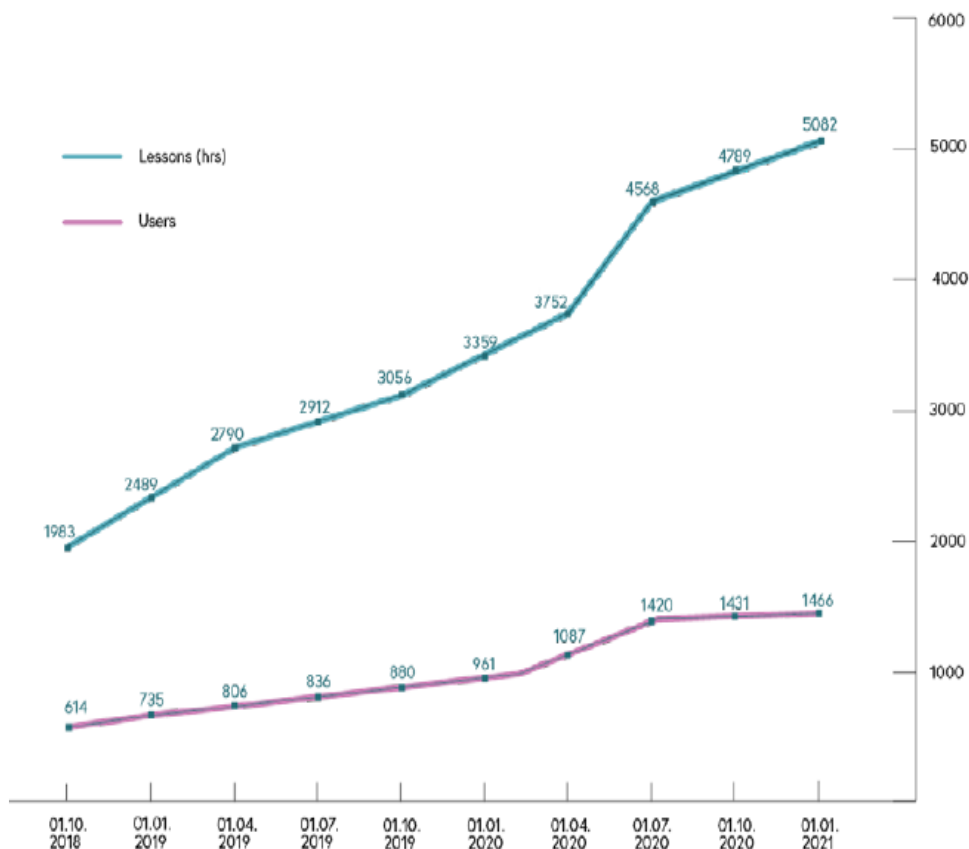
examples. This module includes, among others:

- content about the rule of law,
- acceptance of gifts,
- obligations with regards to conduct,
- secondary employment,
- principles of dealing with each other (BAK 2020: 34).

- E-learning module “Code of Conduct of the Civil Service: The RESPONSibility rests with me – a question of ethics” is an online training which raises awareness among employees with regards to the consequences of violating the rules of conduct and possible sanctions under civil service and criminal law (BAK 2020: 35).
- Worth mentioning at this point is a value based game titled “fit4compliance.” The

game is about critically discussing personal values and moral attitudes. Participants are faced with various dilemma situations that they are asked to solve. Although originally designed for youth, it also turned out to be interesting for adults. The BAK (2017: 31) report noted that the developer of the game prepared the game for the BAK as well. Also, BAK worked on a police version of the game for police-based training.

BAK (2017, 2020) reports note positive effect of these training programs, emphasising the increase in the number of civil servants who went through these various integrity trainings (see Figure 3). Specifically, when it comes to the training displayed in Figure 2, BAK (2020: 34) points out that combination of theory and practical case examples helps employees to quickly refresh their knowledge of the Code of Conduct.



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

**Figure 2.** The rise in the number of users/lessons of the e-learning training titled “Code of conduct of the Austrian Federal Ministry of Interior (MOI) – Our values. Our approach.” Source: BAK 2020: 34).



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## Estonia

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

The course is composed of eight Moodle<sup>1</sup> modules and short You-Tube videos (e.g. a short video on [Gifts and benefits](#)). There is a test after each module to assess the knowledge of participants. The course is flexible in a sense that organisations can import the course into their own e-learning environments and adapt it based on their needs, suggesting the flexibility and cost-effectiveness of this mode of training (Korruptsioon.ee no date).

The e-learning course itself covers the following topics:

- [Introduction](#),
- [Definition of an official](#),
- [Obligation of an official](#),
- [Gifts and benefits](#),
- [Procedural restrictions and related person](#),
- [Exceptions to procedural restrictions](#),
- [Ancillary activities](#),
- [Lobbying and influencing](#).

## Poland

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

Content wise, the course is based on real-life case studies, and participants also learn about possible behaviours to adopt when dealing with corruption.

There are three training sessions on the e-learning platform:

- Corruption in public administration;
- Corruption in business;
- Counteracting corruption.

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

- static text and dialogues,
- animated scenes,
- audio and video materials,
- content provoking discussion and interaction.

Similarly to the previous example of Estonia, each module ends with a test for participants.

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

Importance of the Polish experience lies also in their effort to assess the factors of success and existing challenges, considering that there is not much written on evaluation of different types of integrity trainings. They emphasise the following factors of success of their e-learning platform:

- Free of charge access to e-learning;
- Short and thematic modules;
- Targeted content, relevant for public servants and focused on the Polish and international legislative and regulatory context;
- Improvements in accessibility, use of interactive tools (animations, tests);
- An option to receive a certificate of completion;
- Capacity and knowledge of experts (e.g. they particularly emphasise their access to historical data, database on fraud cases and good practices, which enabled them to design a tailored content relevant for participants) (EC no date).

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<sup>1</sup> An open-source learning management system.

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They also emphasise key lessons learned, which can serve as a useful guidance to countries who are in the process of designing their integrity trainings:

- The first version was too time consuming for users – it was too much focused on numbers and data and it contained content that was too dense.
- Handling of personal data was too time consuming for CBA, so they stopped doing it in the future versions of the e-learning platform.
- The key to success was the knowledge of the team who implemented the course. CBA particularly emphasises the engagement of different types of experts in this process, including: trainers in anti-corruption, investigators, compliance officers, IT experts, psychologists, in order to adequately tailor the content to the relevant target groups (EC no date).

## Slovak Republic

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

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

- National anti-corruption documents;
- International anti-corruption initiatives;
- Other legal instruments, manuals and recommendations produced by the OECD.

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

- Public integrity:
  - Introduction to public integrity;
  - Setting high standards of conduct for public officials;
  - Managing conflict of interest;
  - Managing pre- and post-public employment;
  - Setting standards for the receipt of gifts;
  - Avoiding nepotism;
  - Supporting an open organisation culture within the public sector;

- Ensuring transparency in lobbying;
- E-learning test.
- Elimination of potential for corruption;
- Raising awareness on bribery in international business transactions.

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

## Other relevant examples

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

- Conflict of interest;
- Receipt of gifts;
- Asset and interest disclosure;
- Whistleblower protection policies.

In Canada, the Treasury Board Secretariat collaborates with the Canada School of Public Service to deliver integrity trainings targeted at public officials (Polaine 2018). For example, there is a training titled “Values and ethics foundations for employees”, which is a 1.5 hour online training, aimed to be a part of the introduction to public service. The session includes informative exercises and scenarios, with topics such as:

- Understanding the values and ethics code for the public sector;
- Identifying and applying the values;
- Recognising conflict of interest, ethical dilemmas and accountability issues (Government of Canada no date).

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

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

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

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