

OECD Public Governance Reviews

Strengthening Integrity Leadership in Brazil's Federal Public Administration

APPLYING BEHAVIOURAL INSIGHTS FOR PUBLIC
INTEGRITY



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Foreword

The tone at the top matters. Leaders are increasingly expected to lead by example, inspiring employees to live up to expected behaviours and exhibiting the highest ethical standards. Leaders can also actively promote an integrity culture by giving employees the tools and confidence to make ethical choices, encouraging them to seek advice, to voice their opinions and by providing them a safe space to freely discuss integrity concerns and to raise errors and problems before they become damaging to the organisation.

This report examines key issues around integrity leadership in Brazil's federal public administration, building on a survey of 5 889 senior public officials from 104 federal entities. It proposes a concrete strategy for the Office of the Comptroller General (CGU), which leads integrity policies at the federal level in Brazil, to actively contribute to changing leaders' behaviour.

This report, inspired and informed by insights from behavioural sciences, complements previous OECD collaboration with the CGU in promoting public integrity, including the reports on *Strengthening Public Integrity in Brazil: Mainstreaming Integrity Policies in the Federal Executive Branch* (2021) and on *Modernising Integrity Risk Assessments in Brazil: Towards a Behavioural-sensitive and Data-driven Approach* (2022).

This report contributes to OECD work to help countries effectively implement the *OECD Recommendation on Public Integrity* and in *Applying Behavioural Insights for Public Integrity*. The report was reviewed by the OECD Working Party of Senior Public Integrity Officials (SPIO) on 18 September 2023. It was approved by the Public Governance Committee on 16 November 2023 and prepared for publication by the Secretariat.

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Executive summary

The behaviours of both top and middle level managers are instrumental in promoting open organisational cultures and mitigating integrity risks. Leaders, especially middle managers because of their day-to-day proximity to most public servants, can enable ethical behaviour by all employees and, in particular, by their direct teams.

Building on OECD work on leadership in the federal public administration of Brazil, this report focuses on integrity leadership through a behavioural lens. It follows the BASIC methodology developed by the OECD (BASIC stands for **B**ehaviour, **A**nalysis, **S**trategy, **I**ntervention, **C**hange), a five-step methodology that provides guidance to policymakers on the steps to apply behavioural insights systematically when designing policy interventions. The report draws on interviews, focus groups and a survey administered by the OECD and the Comptroller General of the Union (CGU) to 5 889 Brazilian senior civil servants. Concrete recommendations are provided, informed and inspired by behavioural insights, on how Brazil could strengthen integrity leadership behaviour in its federal public administration.

Main findings

- Recent reforms have been implemented in Brazil to clarify and consolidate the senior civil service system. However, despite improvements, there is still scope to strengthen integrity leadership, including specific actions to address the lack of systematic merit-based criteria and procedures to select and appoint senior civil servants, the absence of explicit references to integrity in the competences for leaders' framework and the lack of periodic and systematic assessment of senior public servants' performance.
- Both the demand for and offer of integrity training targeting high-ranked officials is limited across the Brazilian federal administration. The OECD-CGU survey revealed that only 55% of respondents have participated in ethics-related training over the two years preceding the survey. This contrasts with a high interest in participating in such a training, with 68% of respondents having indicated interest in such trainings. Moreover, a previous survey by the World Bank and the CGU revealed that only 36% of civil servants consider that their leaders regularly promote and raise awareness about integrity, showing the need to encourage leader's dual role as models and managers of integrity.
- Challenges remain to effectively promote an open organisational culture in the Brazilian federal administration. For instance, the OECD-CGU survey revealed that 33.7% of respondents reported having difficulty communicating about integrity within their teams and 54.7% in engaging in conversations regarding integrity concerns in their institutions.
- A previous survey by the World Bank and the CGU revealed that civil servants do not feel safe enough to report misconduct, with only 12% of civil servants having reported corruption in the three years preceding the survey, although a third of civil servants had witnessed unethical practices. This suggests the need to strengthen protection mechanisms and promote a safe environment for reporting misconduct.

- When differentiating by gender, female high-ranked officials expressed higher levels of discomfort with both discussing misbehaviour and reporting cases of corruption than their male counterparts. For instance, while 65% of female surveyed consider it “hard” or “very hard” to discuss misbehaviour at the institutional level, 49% of their male peers expressed similar levels of discomfort. These findings from the OECD-CGU survey suggest the relevance of including a gender lens in Brazil’s integrity policies. Designing and implementing gender-specific integrity policies could effectively contribute to an open organisational culture.
- The OECD-CGU survey shows that leaders of the Brazilian federal administration value and are aware of the benefits of an open dialogue with their employees for handling unethical issues and concerns, especially when compared to a leadership style based on an “iron fist and setting clear boundaries”. Such awareness is a good starting point for initiatives aimed at strengthening an open organisational culture.

Main recommendations

Brazil could start by implementing the following two measures aimed at enabling an environment more favourable to the development of integrity leadership:

- The Ministry of Management and Innovation in Public Services, in co-ordination with the CGU and the National School of Public Administration (ENAP), could more explicitly include integrity in the competence for leaders and provide for periodical performance evaluations of senior civil servants. For the latter, the Ministry of Management and Innovation in Public Services could consider the main conclusions derived from the leadership performance assessment pilot conducted in the former Ministry of Economy in 2020.
- The CGU could measure dimensions of integrity leadership through a regular staff survey to better understand where different federal public institutions stand with respect to integrity leadership and to monitor progress and the impact of specific interventions in public officials’ perceptions and behaviours.

To further strengthen integrity leadership in Brazil, the following three–step strategy could be implemented across public institutions of the federal administration:

- Step 1: Identification. The Integrity Management Units (UGIs) within each public entity of the Federal Executive Branch could identify a set of leaders as internal allies. At entity level, these could become the link between UGIs and civil servants by sharing knowledge and information on integrity and as role models that civil servants could follow and be inspired by.
- Step 2: Training. The CGU and the ENAP could together develop guidance on how to promote an open organisational culture and provide integrity leadership training for senior civil servants aimed at developing skills and capacities needed to become integrity leaders. Moreover, the CGU could partner with the ENAP and the UGIs to develop a specific and more intensive mentoring and training programme for the leaders identified in step 1. This training could also be tailored to each entity following a risk-based approach. Considering the gender specific results of the OECD-CGU survey, the UGIs should encourage equal opportunities to participate in these training and include a gender lens in the training programme.
- Step 3: Networking. The CGU could initiate and promote a network amongst the identified leaders to facilitate exchange of experiences, promote peer learning and enable alliances across the federal administration. In addition to promoting peer support, such a network could become a key ally for the CGU in mainstreaming public integrity across the Brazilian federal administration.

1 Integrity leadership as a driver of change in public entities

This chapter reviews the relevance of integrity leadership in promoting organisational cultures of integrity, emphasising the dual role played by leaders as models and managers of integrity. Through their behaviour, leaders can become a driver of change for the behaviour of public servants in public entities.

1.1. A behavioural perspective on integrity leadership

Behaviours matter. Change requires that people start doing things differently. As such, policy makers need to understand better what drives our behaviour. The innovative potential of incorporating the human factor with its psychological, cognitive and social dimensions into integrity policies is widely acknowledged. Nonetheless, human behaviour is often still an underappreciated dimension in the formulation of integrity policies, which tend to focus on legal and institutional reforms. To bridge this gap, the OECD report on “Behavioural Insights for Public Integrity” links relevant insights from behavioural research to anti-corruption and integrity policy making (OECD, 2018^[1]).

Three key messages emerge from these behavioural insights for public integrity:

- First, independent from the context, most people want to act with integrity. At the same time, they may engage in unethical practices while still managing to feel being an honest person (Cohn et al., 2019^[2]; Fischbacher and Föllmi-Heusi, 2013^[3]; Shalvi et al., 2011^[4]). This has implications for law and policy making (Feldman, 2018^[5]). Traditional anti-corruption measures focus almost exclusively on the corrupt individuals. By doing so, the costs of the anti-corruption measures on the non-corrupt have been largely neglected. Policymakers should focus more on supporting ethical decision-making by providing an enabling environment and trust (Lambsdorff, 2015^[6]). As ethical choice is often unconscious, capacity-building and tools may not be enough to promote actual ethical decisions.
- Second, social norms matter in shaping our choices (Bicchieri, 2005^[7]; Bicchieri, 2017^[8]). People behave according to the beliefs and expectations of what is acceptable within their social context. Integrity reforms may fail if they do not consider existing social norms that may not be aligned with formal regulations and procedures. Again, instead of focusing on bad behaviours and thereby potentially reinforcing existing social norms, making visible good behaviour to promote cultures of integrity could be the key to success. At organisational levels, middle management leaders could play an important role in achieving this.
- Third, integrity policies, even when well-intentioned, may not always deliver the desired impact or may even backfire when people do not react as expected. In particular, when designing awareness raising campaigns policy makers need to consider how the messages conveyed may contribute to unintentionally normalising corruption in the target groups (Cheeseman and Peiffer, 2021^[9]; Peiffer, 2018^[10]; Corbacho et al., 2016^[11]; Ajzenman, 2021^[12]). Instead of making assumptions or desiring how people would or should behave, observing and understanding actual behaviour should be the starting point. Also, piloting before upscaling is key. The understanding of cognitive biases and heuristics has improved; they can be predicted and thus factored-in when designing policies.

Clearly, applying behavioural insights to integrity policies requires an in depth understanding of a given context in which people are taking decisions and acting. It takes the concept of “context matters” very serious. Therefore, the OECD has developed a methodology which provides guidance to policymakers on the steps to apply behavioural insights systematically and responsibly to understand why citizens behave as they do and pre-test which policy solutions are the most effective before implementing them on a large scale (OECD, 2019^[13]).

This methodology, known as the BASIC methodology, consists in the following five steps:

1. **B**ehaviour: Identify and better understand the behaviours that are driving the policy problem.
2. **A**nalysis: Review the available evidence to understand which psychological and cognitive factors are causing the targeted behaviours (why people behave as they do?).
3. **S**trategy: Translate the analysis to behaviourally informed strategies that will effectively change the identified behaviour(s) at the root of the policy problem.

4. **Intervention:** Design and implement an intervention to test which strategy is the most effective to address the problem and reach the policy outcome.
5. **Change:** Look back at the exercise, think about the long-term implications of the intervention and decide whether to develop plans to scale-up into a fully policy intervention to sustain behaviour or bring the project to an end.

In Brazil, the OECD has been supporting the Office of the Comptroller General of the Union (*Controladoria-Geral da União*, CGU) in implementing a project aimed at strengthening the policies, methods and institutions to promote integrity in the federal executive branch of Brazil. This project has three components: i) a review of the integrity risk assessment methodology (OECD, 2022^[14]); ii) an analysis of the Public Integrity System of the Federal Executive Branch (*Sistema de Integridade Pública do Poder Executivo Federal*, SIPEF) to strengthen the Integrity Management Units (*Unidades de Gestão da Integridade*, UGIs) (OECD, 2021^[15]); and iii) the application of behavioural insights to selected public integrity policies. Additionally, within the framework of this project, the OECD supported the CGU in identifying and defining the key Values for the Federal Public Administration (*Valores do Serviço Público Federal*) by means of a participative process with key stakeholders including public officials, citizens and representatives of the private sector.

As part of the third component of this project, a focus group was carried out by the OECD with experts from the CGU aimed at identifying areas where applying behavioural insights could be explored further. Two areas were identified: integrity risk management and integrity leadership. As a result, some avenues for considering behavioural dimensions in integrity risk management were explored in a previous OECD report (OECD, 2022^[14]). In turn, the current report focuses on identifying key aspects to impact on the behaviour of leaders within the federal public administration. It followed the idea of the BASIC methodology and, in addition to interviews and focus groups, implemented a survey of Brazilian senior civil servants (see Annex A). The report provides concrete recommendations, informed and inspired by behavioural insights, on how Brazil could strengthen integrity leadership in its federal public administration.

1.2. Why integrity leadership matters

The tone at the top matters for integrity. First, leaders assign resources to integrity systems, designate them as organisational priorities, oversee their co-ordination and integrate them into the core of their organisational management. Second, from a behavioural perspective, leaders can provide a motivation for others in the integrity system to uphold those values (Mayer et al., 2009^[16]; Hanse et al., 2013^[17]). Indeed, a clear and repeated commitment to integrity by leadership emphasises common values and signals to all public officials that integrity is a crucial part of their professional identity (OECD, 2018^[11]). The top does not only refer to the highest political and management levels. The relevance of middle and lower management cannot be downplayed, as their immediate impact on the behaviours of staff under their direct responsibility may arguably be even higher and more direct (OECD, 2020^[18]; OECD, 2018^[11]). For example, a study of local governments in the United Kingdom found evidence for the role played by leaders in promoting and reinforcing standards of conduct especially when they intervene informally to steer behaviour and resolve emerging problems rather than just relying on formal mechanisms (Downe, Cowell and Morgan, 2016^[19]).

At the same time, research showed that ethical leaders should not be perceived by their employees as “moral judges” who are looking “down upon them” (Stouten et al., 2013^[20]). The study carried out with samples from Belgium, the Netherlands and the US therefore suggests that ethical leaders should recognise employees’ values and approach them respectfully. More than just discussing expected behaviours of employees with them, leaders should also care about how employees feel about the application ethical standards in their daily work (Stouten et al., 2013^[20]).

For this report, leaders are considered as “senior civil servants who occupy the highest-ranking positions of administrative bureaucracies and who lead public civil servants in the pursuit of governmental goals”

(Gerson, 2020^[21]). However, many of the findings and recommendations included in this report equally apply to line/middle managers. As mentioned, line/middle managers probably matter even more than those at the very top, because of their larger day-to-day proximity to most public servants, who tend to take values and moral signals from those they see around them rather than those at the very top who they rarely see.

Integrity leadership helps demonstrate a public sector's commitment to public integrity. More specifically, integrity leadership refers to “the demonstration of normatively appropriate conduct through personal actions and interpersonal relationships, and the promotion of such conduct to followers through two-way communication, reinforcement, and decision-making” (Brown, Treviño and Harrison, 2005^[22]). This means that to be an integrity leader, two interrelated aspects, termed as the “moral person” aspect and the “moral manager” aspect (Treviño, Hartman and Brown, 2000^[23]), are required:

- The leader, as a high-level public official, needs to be perceived as a “**moral person**” who understands the values underpinning the public service and his/her particular organisation and uses them to make the right decisions, even when faced with an ethical dilemma. Senior civil servants are required to negotiate multiple and often competing values and conflicts between values – which are common and often unavoidable, e.g., between democracy and bureaucracy; efficiency and equality; consistency, change and innovation; accountability and risk taking (Gerson, 2020^[21]). Leaders must understand these trade-offs and the implications of their decisions. In addition, research evidenced that prosocial behaviour is contagious (Chancellor et al., 2018^[24]; Chancellor, Margolis and Lyubomirsky, 2018^[25]): by being kind, leaders can promote prosocial behaviour such as kindness. In a nutshell, by changing and making visible their behaviours, leaders can help creating norms that others may follow (Acemoglu and Jackson, 2013^[26]).
- Furthermore, the leader needs to be perceived as a “**moral manager**” who communicates openly about integrity and gives employees the tools and confidence to make ethical choices, encourages them to seek advice, to voice their opinions and makes them feel comfortable to freely discuss integrity concerns and to raise questions before they become damaging to the organisation and the work environment (Wu and Danqi, 2015^[27]). Leaders can actively shape an environment of psychological safety within their teams (Newman, Donohue and Eva, 2017^[28]; Edmondson, 1999^[29]). In short, leaders can actively promote and reward appropriate behaviour and discipline bad conduct (Brown, Treviño and Harrison, 2005^[22]).

Not only both roles are important, but there also needs to be consistency between them (OECD, 2009^[30]). Particularly worrying is a situation where a manager pretends to be a “moral manager”, this is, a manager of integrity, but is not acting as a “moral person” or model of integrity. Such a hypocritical leader “talks the ethics talk” but does not “walk the ethics walk”; the words are not aligned with deeds and reflect a lack of behavioural integrity (Treviño, Hartman and Brown, 2000^[23]; Simons, 2002^[31]). If employees perceive discrepancies between rhetoric and behaviour, this may lead to cynicism and could even nurture the ability of employees to justify their own unethical practices (OECD, 2009^[30]; OECD, 2018^[1]; Tenbrunsel and Messick, 2004^[32]).

“...ethical philosophies will have little impact on employees’ ethical behaviour unless they are supported by managerial behaviours which are consistent with these philosophies” (Stead, Worrell and Stead, 2013^[33]).

As such, through social learning, good leadership at all levels appears to be key in the establishment of an open culture of integrity inside organisations (OECD, 2018^[1]; Bandura, 1977^[34]). While integrity leadership is not a silver bullet (Wang et al., 2021^[35]; Kalshoven, van Dijk and Boon, 2016^[36]), leaders can be important vectors for organisational change by living and promoting institutional values and principles (Box 1.1).

Box 1.1. Applying Behavioural Insights to Organisations: Theoretical Foundations

Nudging supervisors or other powerful or influential people within an organisation can have a multiplying effect such that the behaviours exhibited and endorsed by influential individuals have a better chance of being adopted *en masse*, nudging a whole organisation in the process. Indeed, charismatic and transformational leaders are believed to possess qualities that inspire followers to behave in desired ways in service of a larger goal. Nudging such leaders can effect largescale behavioural change.

Of course, those in formal leadership roles toward the top of the organisational hierarchy are also in a good position to effect widespread behavioural change by altering organisational policies and procedures. Nudges that help high-level decision makers (leaders, boards, etc.) optimise organisational policy decisions in the face of their own biases and irrationalities can have an effect. Thus, helping decision makers see the connection between policies, procedures, and behaviour on the ground is another way to nudge whole organisations.

Source: (OECD, 2020^[37]).

Measures supporting an open organisational culture operate on several dimensions, including awareness, engagement, credibility, empowerment and courage (Table 1.1). For instance, when looking at the effectiveness of reporting channels, prior to pondering whether to communicate an ethical concern, an employee must first be able to detect misconduct and violations of integrity standards (Berry, 2004^[38]). However, being aware is not sufficient: When organisational values and norms conflict with those of the employee, their commitment and involvement to the organisation will likely suffer. In this sense, engaging public servants and deepening their commitment to organisational values and norms is needed to encourage them to speak up about violations and defending their organisation's interests. This is supported when senior civil servants act as role models, ensuring that the organisation's norms and values are credible and lived in the organisation. An open organisational culture requires empowerment and courage of employees to raise ideas or concerns while knowing they will not be punished for their courage and initiative.

Table 1.1. Dimensions of an open organisational culture

Dimension	Guiding questions
Awareness	What are the standards in this organisation? What is my role in upholding these standards?
Engagement	Do I believe in the values of this organisation? Are they congruent with my personal values and beliefs? How attached am I to the organisation? What am I willing to do on behalf of the organisation?
Credibility/Trust	If leaders do not follow or uphold standards, the standards must not be meaningful. If no one follows the rules, then why should I? If leaders do not behave consistently with what is stated formally, then how can they be trusted? If I cannot trust leadership, how can I believe in the integrity of this organisation?
Empowerment	Who will listen to me? Will anyone believe me? Can I make a difference? Will I even be heard?
Courage	What will happen if I go forward? Will anyone support me? What risks are involved? What can I afford to lose? Am I committing career suicide? Is it worth it? What if I am wrong?

Source: adapted from (Berry, 2004^[38]).

These dimensions suggest that senior civil servants, leaders, have a key role in encouraging an open organisational culture. First, by setting the right example from the top, senior officials ensure the credibility of the organisations' standards. Second, by communicating about values and standards and engaging employees in discussions on integrity norms, senior officials promote officials' engagement to the values of the organisation. Third, by advising employees on integrity challenges and listening and acting upon employees' suggestions and reports of misbehaviour without punishing them, senior officials promote officials' empowerment and courage. Indeed, in organisations where dialogue and feedback are appreciated by management, employees are more willing and feel more comfortable to discuss and report suspected misconduct internally (Heard and Miller, 2006^[39]). Research showed that by creating a psychologically safe environment within their team, integrity leaders can enhance employees' voice behaviour (Walumbwa and Schaubroeck, 2009^[40]) and internal whistleblowing (Liu, Liao and Wei, 2015^[41]; Shaukat Malik and Kashif Nawaz, 2018^[42]). Research also showed that a supporting and encouraging behaviour of leaders is strongly associated with the willingness of employees to blow the whistle (Bhal and Dadhich, 2011^[43]).

In turn, research emphasises that there is also a "dark side of leadership" when leaders behave in ways that are destructive and counterproductive both for their employees and their organisation (Schyns and Schilling, 2013^[44]; D'adda et al., 2017^[45]). Leaders are human beings. They can be subject to biases that can lead them unconsciously to make decisions that are not ethical or that make them blind to unethical practices in their surroundings. For example, research shows that leaders and high-ranking individuals who identify strongly with their organisation can present a higher risk of letting integrity breaches go unchallenged. This happens because this strong identification conducts them to perceive as ethical their organisations' practices, even when they are not (Kennedy and Anderson, 2017^[46]). Also, leaders may overestimate their own ability to prevent an integrity breach or underestimate the likelihood of an integrity breach among their peers and employees. Managerial oversight is therefore insufficient as the only defence of integrity. It is thus important to remember there are always two faces of leadership, with some "leadership pathologies" that need to be understood and taken into account in trainings and organisational policies (Washbush and Clements, 1999^[47]). In this sense, investing in integrity leadership needs to promote and empower good leaders, make them aware of potential consequences of their positions of power and biases, but also prevent or timely detect destructive leaders that could establish unethical practices as the norm to follow.

The OECD Recommendation on Public Integrity recognises the role leadership plays in building an open culture of integrity within public institutions (Box 1.2). Similarly, the OECD Recommendation on Public Service Leadership and Capability emphasises the relevance of a values-driven culture and leadership in the public sector and calls for defining the values of the public service, promoting values-based decision-making and building leadership capability in the public service (OECD, 2019^[48]). More specifically, four main leaderships capabilities for a high performing civil service have been defined: (1) value-based leadership, (2) open inclusion, (3) organisational stewardship and (4) network collaboration (Gerson, 2020^[21]). These aspects will be picked up in the following sections.

Box 1.2. Integrity Leadership in the OECD Recommendation on Public Integrity

The OECD Recommendation on Public Integrity calls on adherents to “invest in integrity leadership to demonstrate a public sector organisation’s commitment to integrity”.

This can be achieved in particular through:

- Including integrity leadership in the profile for managers at all levels of an organisation, as well as a requirement for selection, appointment or promotion to a management position, and assessing the performance of managers with respect to the public integrity system at all levels of the organisation.
- Supporting managers in their role as ethical leaders by establishing clear mandates, providing organisational support (such as internal control, human resources instruments and legal advice) and delivering periodic training and guidance to increase awareness of, and to develop skills concerning the exercise of appropriate judgement in matters where public integrity issues may be involved.
- Developing management frameworks that promote managerial responsibilities for identifying and mitigating public integrity risks.

Furthermore, the OECD Recommendation on Public Integrity encourages an open culture within the public sector “where ethical dilemmas, public integrity concerns, and errors can be discussed freely, and where appropriate, with employee representatives, and where leadership is responsive and committed to providing timely advice and resolving relevant issues”. As such, an open organisational culture requires leaders that are responsive and committed to providing timely advice and resolving relevant issues, and employees who are comfortable raising ethical concerns.

Source: (OECD, 2017^[49]; OECD, 2020^[18]).

The next chapter (Chapter 2) provides an overview of integrity leadership and open organisational cultures in the Brazilian federal administration, identifying challenges and opportunities for strengthening integrity leadership. This analysis leads to a set of recommendations to promote integrity leadership behaviour in Brazil, which are explained in detail in Chapter 3.

2 Integrity leadership and open organisational culture in the Brazilian federal administration

This chapter presents findings that are key to understand the current context and main challenges and opportunities to strengthening integrity leadership and building an open organisational culture in the Brazilian federal administration. Currently, integrity is neither systematically considered in the selection, appointment and promotion of senior management position, nor part of leadership trainings. In addition, Brazil is facing challenges in terms of promoting an open organisational culture.

2.1. Understanding the context

The BASIC methodology requires a deep understanding of the context in which a target behaviour occurs (OECD, 2019^[13]). As emphasised in Chapter 1, looking at integrity leadership from a behavioural perspective is interesting at two levels: first, the behaviour of leaders themselves: Are leaders behaving as a role model? Do they provide guidance on integrity and are contributing to creating a safe space where employees can discuss about problems, errors and clarify doubts? Second, the behaviour of the leaders' employees: Do employees follow their leader, as has been shown in experimental research (D'adda et al., 2017^[45]), and could thus become a key leverage for influencing organisational cultures of integrity and openness?

Considering the potential role that leaders could have in promoting a culture of integrity within the public sector, in June 2022 the CGU and the OECD implemented the *CGU/OECD Survey on integrity and leadership in the Brazilian Executive Branch*. This survey aimed at providing information on leaders' behaviours and other key factors that could be considered to further strengthen public integrity within the Brazilian Public Administration. The survey targeted high-level officials of the executive branch – this is, people who at the time of the survey were occupying DAS-4, DAS-5, or equivalent positions – across the country, and who additionally directly supervised a work team within a public institution. The survey included questions on sociodemographic characteristics, participation on integrity-related training, exposure to unethical behaviours within the public institution and direct work team, perceptions about openness to dialogue and organisational environment, level of knowledge and approval of UGIs' management, leadership style preferences, and a vignette experiment aimed at identifying relative determinants of unethical behaviour's perception (for more information see Annex A).

Additional information used as part of the analysis of this report comes from previous and ongoing work of the OECD on integrity and leadership in Brazil (OECD, 2023^[50]; OECD, 2019^[51]; OECD, 2021^[15]) and from interviews and focus groups carried out by the OECD in the context of this project and the forthcoming OECD Integrity Review of Brazil. In the following sections, this chapter thus presents some findings that are key to understand integrity leadership in Brazil.

2.2. Current challenges to integrity leadership in the Brazilian federal administration

2.2.1. Merit-based selection, appointment and promotion of senior management positions are not systematically implemented in Brazil threatening integrity leadership

In Brazil, leadership (*liderança*) has been identified as one of the mechanisms for the exercise of public governance, together with strategy (*estratégia*) and control (*controle*). According to Decree 9.203/2017, leadership comprises a set of human or behavioural practices exercised in the main positions of organisations to ensure the existence of the minimum requirements for the exercise of good governance (Art 5(I)).

These minimum requirements are:

- integrity
- competence
- responsibility
- motivation

Considering the role that leadership plays in achieving good governance, Brazil has recently implemented reforms with the aim of clarifying and consolidating a regime to support and manage senior leaders, which

include the design and implementation of a new classification system for senior management positions and a set of common competences for leaders.

Until 2021, the senior managers regime included Senior Direction and Counselling Group (*Grupo Direção e Assessoramento Superiores*, DAS), commissioned functions (*funções comissionadas do poder executivo*, FCPE) and various other contract types (OECD, 2019^[51]). DAS was Brazil's dominant system of senior managers, which was structured into six levels of management (operational, tactical and strategic management), DAS-6 being the highest ranking (OECD, 2019^[51]). Additionally, several senior positions were handled outside the DAS system, including through the FCPE, which ranged from 1 to 6. The main difference between DAS and FCPE positions was that FCPE positions were reserved for civil servants, while anybody could be appointed to DAS positions. Moreover, appointments into DAS and FCPE positions were, by definition, made at the will of the government and relevant hiring authorities. Appointment criteria were neither systematic nor comprehensive and the vast number of managerial positions were independent from passing a competitive examination (OECD, 2019^[51]). In this sense, across the federal administration, there was great heterogeneity in procedures, application forms and criteria for selecting and appointing senior managers, depending on the hiring and selection authority (OECD, 2019^[51]).

As of 2021, by means of Law 14.204/2021 and Decree 10.829/2021, a new classification for senior management positions, including minimum criteria for selection/appointment of senior public officials that were previously established by a 2019 Executive Order, came into force. DAS positions have been converted to Executive Commissioned Positions (*Cargo Comissionado Executivo*, CCE), ranging from levels 1-18, and FCPE positions have been converted to Executive Commissioned Functions (*Função Comissionada Executiva*, FCE), ranging from levels 1-17. As before, certain positions are reserved for civil servants: 60% of the total number of commissioned positions need to be occupied by career civil servants. Moreover, both CCE and FCE may hold positions of “Advising”, “Management” and “Project Management”; but only FCEs may also hold positions of “Specialised/Technical Management”. Decree 10.829/2021 establishes criteria for appointed senior management positions (*cargos em comissão e de funções de confiança*), requiring, amongst others, “moral suitability” and an “undoubted reputation”, without defining these further, however.

Additionally, by Normative Instruction SPG-ENAP/SEDGG/ME 21/2021, the National School of Public Administration (*Escola Nacional de Administração Pública*, ENAP) and the former Ministry for Economy (*Ministério da Economia* – today Ministry of Management and Innovation in Public Services (*Ministério da Gestão e Inovação em Serviços Públicos*)) published a set of transversal competences for a high-performance public sector (*competências transversais de um setor público de alto desempenho*), which apply to all public officials of the federal administration, as well as a set of competences for leaders (*competências de liderança*), which apply to public officials in leadership positions. Although these competences are not mandatory but are meant to provide public institutions a support framework for setting their People Development Plan (*Plano de Desenvolvimento de Pessoas*), this is a step towards mapping the skills, attitudes and competences that public sector leaders require.

There are seven transversal competences – i.e. evidence-based problem solving (*resolução de problemas com base em dados*), focus on results for citizens (*foco nos resultados para os cidadãos*), digital mindset (*mentalidade digital*), communication (*comunicação*), teamwork (*trabalho em equipe*), ethical values orientation (*orientação por valores éticos*), and systemic view (*visão sistêmica*) – and nine competences for leaders. Competences for leaders are organised into three groups – people (*pessoas*), results (*resultados*) and strategy (*estratégia*) – and include the following:

- **People:** i) self-knowledge and personal development (*autoconhecimento e desenvolvimento pessoal*); ii) people and team engagement (*engajamento de pessoas e equipes*); and iii) networking and collaboration (*coordenação e colaboração em rede*).
- **Results:** i) users value creation (*geração de valor para o usuário*); ii) results management (*gestão para resultados*); and iii) crisis management (*gestão de crises*).

- **Strategy:** i) future thinking (*visão de futuro*); ii) innovation and change (*inovação e mudança*); and iii) strategic communication (*comunicação estratégica*).

Despite these reforms, the approach to the senior civil service is still fragmented and it is not accompanied by a broader strategy to further consolidate and strengthen the senior level in the federal civil service (OECD, 2023_[50]). This also implies challenges to developing integrity leadership in a more systematic manner. For instance, under the new regime, there are still two distinct groups of senior civil servants (CCE and FCE), where all FCE positions are required to be career civil servants, meaning the CCE can be filled with people who were not required to pass through a competitive examination to enter the civil service. Moreover, it is not required – but voluntary – to undertake competitive selection processes to fill these positions, meaning that most senior civil servants are appointed directly to their position without any formal skills assessment. Additionally, candidates are expected to meet limited criteria to be eligible or hired, which ministries can circumvent under justification addressed to the Presidency (OECD, 2023_[50]).

Finally, weaknesses remain in terms of performance assessment, learning and development and open transparent promotion opportunities for senior civil servants (OECD, 2023_[50]). Indeed, beyond the selection and hiring process, most OECD countries have a separate and specific performance assessment system that applies to senior civil servants to ensure well-defined goals, aligned incentives, relevant learning and development opportunities and appropriate accountability (Gerson, 2020_[21]). More specifically, in over 60% of OECD countries, performance assessments for senior public servants are essential as there is a clear relationship between contract renewal and the results of formal performance assessments. However, in Brazil, although performance evaluation is mandatory during civil servants' probationary period and for the majority of civil servants every 6, 12 or 18 months, there are some groups that are not evaluated, including public servants who occupy high-level positions. The lack of performance assessment for senior public servants raises specific integrity risks and concerns, especially when considering that many senior public servants are freely appointed – this is, appointed directly to their position without any formal skills assessment.

2.2.2. Currently, integrity is not explicitly part of leadership trainings in Brazil

In Brazil, the ENAP is the main institutional actor responsible for supporting and promoting training programmes for people in leadership positions (Decree 10.369/2020 and Decree 11.094/2022). As part of this mission, in 2020, the ENAP established the LideraGov Programme, a development programme for potential leaders of the Brazilian federal administration (Box 2.1). Additionally, the ENAP has conducted other activities aimed at supporting and promoting training for leaders. These activities include providing postgraduate training in specific policy areas and strengthening partnerships with international leadership training institutions to develop and deliver short-term courses in areas related to leadership in public organisations (*Programa de Capacitação para Altos Executivos*).

Box 2.1. The Brazilian LideraGov Programme for the federal public administration

The LideraGov Programme (herein “LideraGov”) was established by Joint Ordinance (*Portaria Conjunta*) 254/2020 as the result of an unprecedented partnership between the former Ministry of Economy and the ENAP. LideraGov makes part of the National People Development Policy (*Política Nacional de Desenvolvimento de Pessoas - PNDP*) of the federal government (Decree 9.991/2019).

LideraGov targets civil servants (occupying DAS 1, 2 or 3) with the potential and motivation to become leaders. The aim of the programme is to build a network of qualified professionals committed to the generation of public value, with the potential of enacting as innovative leaders, and occupying strategic leadership positions (i.e., DAS and FCPE positions from levels 4 to 6, or equivalent) at the Brazilian federal administration.

LideraGov encompasses four phases, deemed essential for participants to develop the desired skills and abilities:

- **First phase:** selection process. During this phase, candidates who demonstrate having leadership potential are identified. The selection process is merit based and consists of three stages: i) analysis of the profile and professional trajectory; ii) analysis of the leadership potential; and iii) analysis of the professional competencies.
- **Second phase:** qualification course (*Curso de Qualificação*). Theoretical and practical executive trainings aimed at developing essential skills for public leaders. This phase consists of 120 hours of synchronous activities organised in 8-hour classes given over 9 months every 15 days. In addition, participants have 20 extra hours of activities (synchronous and asynchronous) to support their learning process by enabling the application of the skills learned.
- **Third phase:** Assistance and realisation (*Acompanhamento e Efetivação*). It takes place in parallel with the second phase and consists in guiding participants through individual and collective mentoring, supporting each participant in preparing a personal development plan, offering feedback sessions, and conducting networking events.
- **Fourth phase:** evaluation of the Programme.

The training path carried out by LideraGov is designed based on three axes, enabling participants to experience a learning process focused on the development of a set of skills related to self-leadership (axis 1), engagement of people and teams (axis 2) and the organisation's strategy (axis 3).

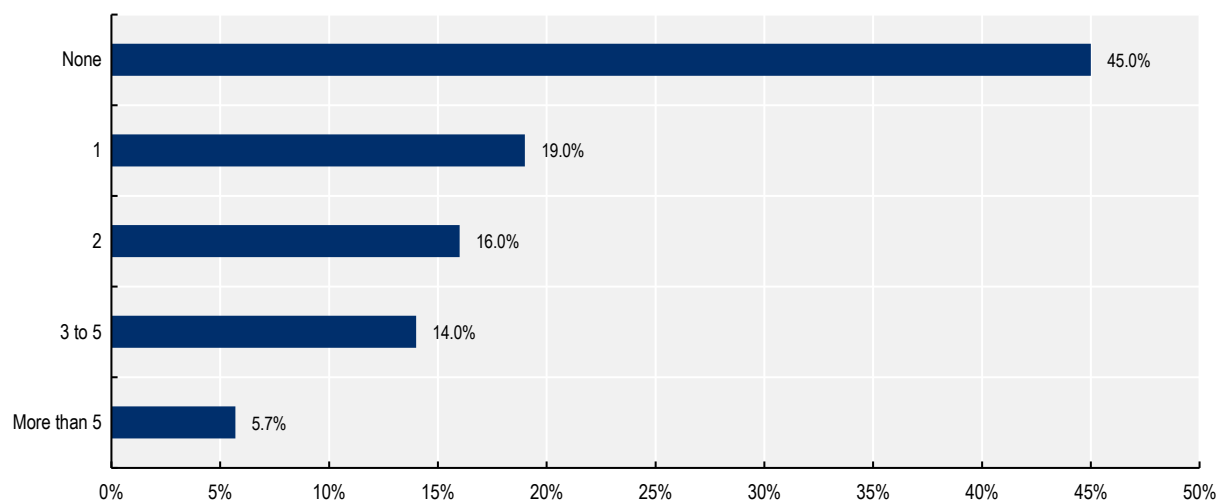
LideraGOV is currently in the second phase of its second edition, which was launched in October 2021.

Source: Interviews conducted by the OECD during the fact-finding missions in Brazil.

However, when it comes to specific training on integrity, evidence suggests that additional efforts are needed to ensure leaders are provided with the skills and abilities to uphold integrity standards, provide timely advice on relevant ethical issues and promote ethical decision making among those they lead. Indeed, the CGU/OECD *Survey on integrity and leadership in the Brazilian Executive Branch* shows that almost half of high-ranked officials surveyed (45%) have not participated in any ethics related training over the previous two years prior to when the survey was conducted (Figure 2.1), and only 19.7% of high-ranked officials surveyed reported to have participated in three or more ethics related courses. These indicators suggest that even when leaders do participate in ethics-related training, the training intensity is relatively low.

Figure 2.1. Training intensity among high-ranked officials surveyed over the previous two years

Share of respondents



Note: High-ranked officials survey were asked “On how many training sessions have you participated in over the last 2 years?”. Maximum value is equal to 15 trainings.

Source: CGU/OECD Survey on integrity and leadership in the Brazilian Executive Branch.

Throughout their career path, public officials are offered to improve their knowledge and acquire skills on integrity. Therefore, it could be expected that the training intensity (understood as the number of courses attended by an official in the last 2 years) should be significantly and positively correlated with age. However, testing this assumption through a simple linear regression, the results did not find a positive, statistically significant relationship between age and training intensity. On the contrary, data suggest that the younger the respondents, the higher their training participation for those who responded to have received more than five courses. This may reflect a need to focus active efforts to reach out to older leaders, while younger generations seem to be more intrinsically motivated to participate in integrity trainings. Finally, when differentiating by gender, female high-ranked officials surveyed seem to be more interested in integrity related training that their male peers. On average, female officials have participated in 1.6 trainings over the previous two years prior to when the survey was conducted, compared to 1.3 trainings in the case of men. This difference is significant at the 10% level.

The limited number of high-level officials that have participated in training on public integrity over the previous two years prior to the survey contrasts with the high number of respondents interested in participating in such a training. Indeed, the CGU/OECD Survey on integrity and leadership in the Brazilian Executive Branch reveals that 68% of officials surveyed indicated being interested in participating in a leadership training/intervention. This suggests that there may be gaps between the type, intensity and/or schedule of trainings provided by the CGU, the Integrity Management Units (*Unidades de Gestão da Integridade*, UGIs) and/or others, including the Public Ethics Commission (*Comissão de Ética Pública*, CEP) and the Ethics Commissions (*Comissões de Ética*), and the type, intensity and/or schedule of trainings expected by senior civil servants – for instance, trainings are scheduled during particularly busy periods, so even if senior civil servants wish to attend they cannot do it. The results thus highlight the relevance of collecting participants’ feedback and developing innovative ways of delivering training on public integrity and integrity leadership.

Moreover, evidence suggest that leaders do not sufficiently engage in raising awareness about integrity and communicating integrity standards within their teams and organisations. Indeed, the *2021 Survey on Ethics and Corruption in the Federal Public Service* reveals that civil servants' training on integrity programmes is limited (only 31.3% of respondents reported having received training on their organisation's integrity programme), and that integrity programmes are generally little publicised by leaders (only 36% of civil servants said their leaders regularly promoted their organisation's integrity programmes) (World Bank, 2021^[52]). This survey, designed and implemented by the World Bank in partnership with the CGU, the former Ministry of Economy and the ENAP, was implemented in June 2021 and targeted civil servants of the federal administration. The survey includes questions related to human resources, social norms and regulations, behaviour assessment (collective and individual) and corruption reporting mechanisms.

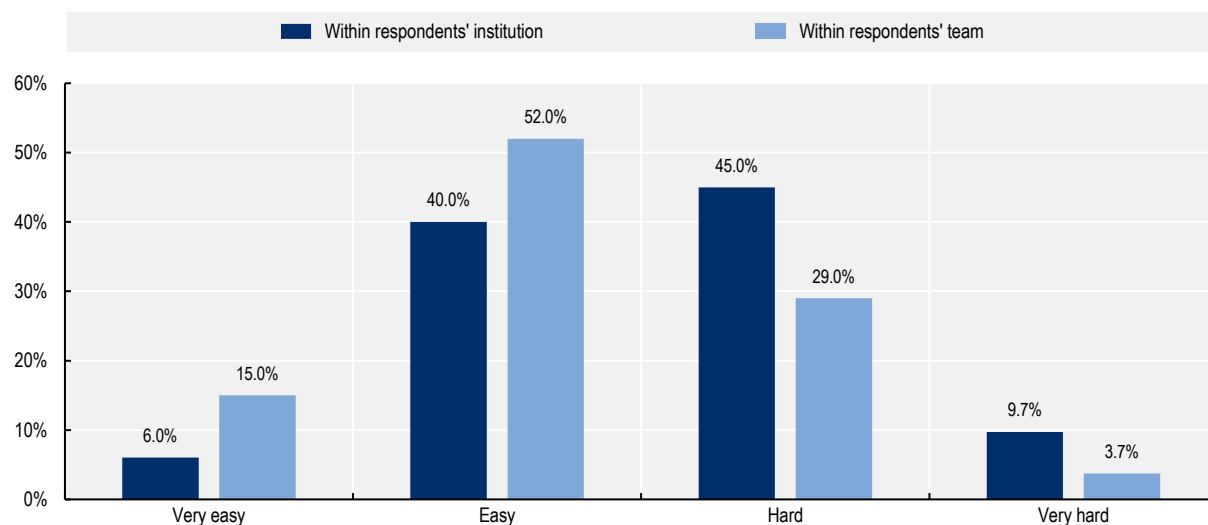
Additionally, evidence from the CGU *Perception Survey of Federal Civil Servants on Public Integrity (Pesquisa de Percepção com Servidores Públicos Federais sobre Integridade Pública)* complements these findings by showing that 65% of respondents have never participated in a meeting or discussion in their institution related to "integrity", and that 26% of respondents have not participated in an integrity related training – on conflicts of interests, ethics, information or risk management, nepotism, disciplinary regime, and transparency – in the previous two years prior to when the survey was conducted. This survey was designed and implemented by the CGU in 2022 and targeted civil servants of the federal administration.

2.2.3. Brazil faces several challenges for effectively promoting an open organisational culture in the public sector

The culture of integrity in an organisation is greatly determined by the development and promotion of an open organisational culture (OECD, 2020^[18]). Within the context of public integrity, an open organisational culture means employees, managers and leaders feel safe to voice their opinions and actively identify and discuss questions, concerns and ideas on potential violation of public integrity. Building an open organisational culture has several benefits. For instance, it can help cultivate pride of ownership and motivation amongst employees who feel their voice is heard and valued and encourage people to raise and solve integrity questions before they become damaging to the organisation.

An open organisational culture has the following supportive elements: leaders that are responsive and committed to providing timely advice and resolving relevant integrity concerns, and employees that feel comfortable raising integrity concerns and reporting misconduct (OECD, 2017^[49]). In Brazil, evidence from recent surveys suggests that the supportive elements of an open organisational culture are still weak, and challenges remain to effectively promote openness within the public sector.

First, leaders have difficulties to communicate about integrity and engage in conversations about integrity concerns. Indeed, according to the *CGU/OECD Survey on integrity and leadership in the Brazilian Executive Branch*, most high-ranked officials surveyed (54.7%) reported to find it "hard" or "very hard" to discuss unethical practices in their institutions (Figure 2.2). However, this proportion decreases to 33.7% when it comes to discussing unethical practices within the officials' direct work team, which suggests leaders feel less uncomfortable discussing integrity concerns with their direct peers (Figure 2.2). "Psychological safety" or a safe environment is a baseline condition for openness within an organisation (OECD, 2020^[18]; Liang, Farh and Farh, 2012^[53]). How to enable an open and safe environment therefore should be a key part of the integrity training for leaders (see Chapter 3).

Figure 2.2. Difficulty to discuss unethical practices within respondents' institutions and teams

Note: High-ranked officials survey were asked “In your opinion, how difficult is it to talk about unethical behaviours that have occurred within your federal agency?” and “In your opinion, how difficult is it to talk about unethical behaviours that have occurred within your team?”.

Source: CGU/OECD *Survey on integrity and leadership in the Brazilian Executive Branch*.

Moreover, when differentiating by gender, female high-ranked officials surveyed are more likely to find it “hard” or “very hard” to discuss misbehaviour compared to their male peers, both at the institutional level and within the officials’ direct work team. Indeed, 65% of female surveyed consider it “hard” or “very hard” to discuss misbehaviour at the institutional level compared to 49% of their male peers, and 38% of female surveyed consider it “hard” or “very hard” to discuss misbehaviour at the team level compared to 28.2% of their male peers. Potentially, in addition to reflect a higher discomfort of speaking up, this finding could reflect issues related to sexual harassment in the federal public administration. This hypothesis could be further investigated and addressed by the CGU.

Second, the majority of civil servants do not feel safe enough reporting misconduct, mainly because of the lack of protection mechanisms for complainants and the fear of conflict with other civil servants. Indeed, according to the *2021 Survey on Ethics and Corruption in the Federal Public Service*, although a third of all civil servants have witnessed unethical practices in the past three years to when the survey was conducted, only 12% reported corruption in the same period (World Bank, 2021^[52]). It is important to point out, however, that not all unethical practices necessarily correspond to corruption. Additionally, a greater number of women reported feeling insecure when reporting (59.6%) compared to men (44.3%), which confirms the finding above from a different perspective and provides a strong case to include a gender lens in CGU’s integrity policies.

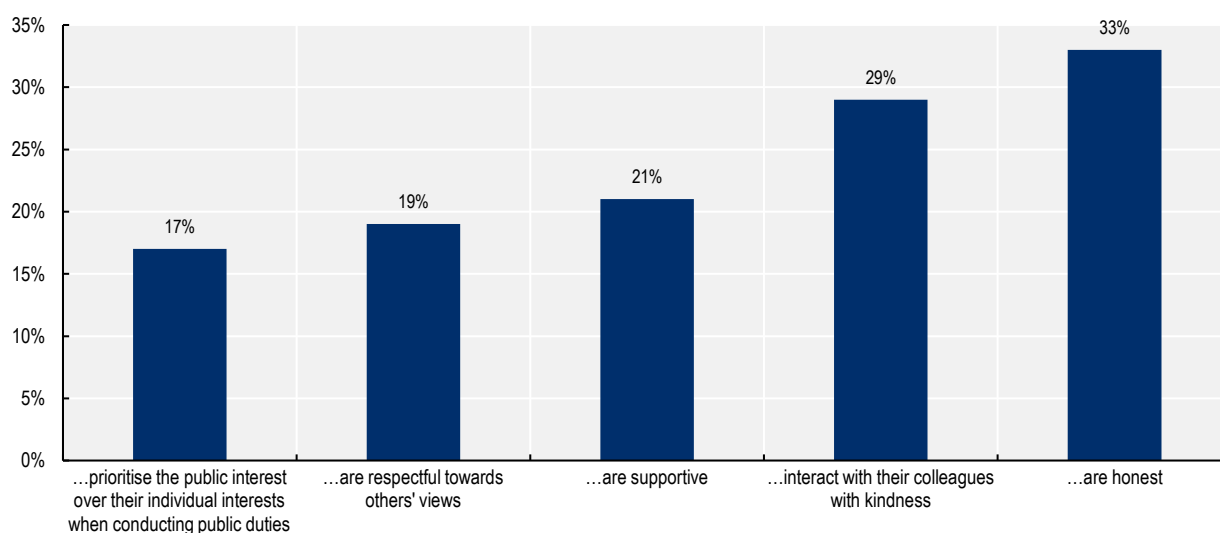
Knowledge on integrity programmes seems to reduce these feelings of insecurity when it comes to reporting misconduct: 68% of respondents who fully agreed with having received training on integrity programmes indicated feeling safe to report misconduct, while only 36.3% of respondents who fully disagreed with having received training on integrity programmes indicated feeling safe to report misconduct (World Bank, 2021^[52]). These indicators suggest the relevance of strengthening training on integrity as a mechanism to encourage reporting.

Third, as emphasised in Chapter 1, there can be a dark side of leadership. Sometimes, leaders are promoting unethical practices. Indeed, according to the *2021 Survey on Ethics and Corruption in the Federal Public Service*, leaders and managers are considered to be the main agents of pressure to civil servants to engage and commit unethical practices. The survey indicates that amongst civil servants who

reported having been pressured to engage in unethical practices, 65% indicated that the pressure came from their (direct or indirect) superior (World Bank, 2021^[52]). The main unethical practices hierarchical superiors exerted pressure to civil servants to commit were bending the organisation's rules and procedures and overlooking inappropriate behaviours. A deeper analysis on this issue revealed that DAS officials reported having suffered less pressure from their hierarchical superiors but greater pressure from politicians (World Bank, 2021^[52]). These findings go against the idea of encouraging a safe environment where employees voice their opinions and feel comfortable discussing ethical dilemmas and unveil challenges to promote openness at different levels of the federal public administration.

Finally, another challenge for effectively promoting an open organisational culture consists in the low levels of perception of the presence of certain key values within senior civil servants' work teams. Indeed, the CGU/OECD *Survey on integrity and leadership in the Brazilian Executive Branch* (Figure 2.3) shows that, at the team level, only 17% of respondents "totally agree" that people within their team prioritise the public interest over their individual interests when conducting their public duties, only 19% of respondents "totally agree" that people within their team show respect towards others' opinions, and only 21% of respondents "totally agree" that people within their team are supportive (*solidários*). These indicators show clearly the relevance of strengthening an open organisational culture where people feel safe to discuss their ethical concerns and share their opinions, as well as strengthening solidarity and respect within work teams.

Figure 2.3. Senior public servants' perception towards people within their work teams



Note: This figure shows the percentage of respondents that totally agree "people within their work teams...".

Source: CGU/OECD *Survey on integrity and leadership in the Brazilian Executive Branch*.

Despite the several challenges to promote an open organisational culture in the Brazilian federal administration, the CGU/OECD *Survey on integrity and leadership in the Brazilian Executive Branch* reveals that openness to dialogue is highly appreciated by high-level officials when it comes to handling unethical situations with subordinates. Indeed, when asked for an ideal day-to-day leadership style, the senior civil servants rated "openness to dialogue and tolerance" and "high values and integrity" as more important than leading with an "iron fist and setting clear boundaries".

This finding was also backed by the results of a vignettes experiment conducted within the CGU/OECD *Survey on integrity and leadership in the Brazilian Executive Branch*. Indeed, the survey included two vignette sections aimed at revealing senior public officials' personal preferences based on fictive systematically varied scenarios (see Annex A for more details on this methodology). Amongst others,

Vignette 2 (the second set of scenarios) explored the importance of openness to dialogue from the leaders' perspective when it comes to reacting to unethical behaviours within their team. The results clearly show that the senior civil servants who participated in the survey support the scenario where the leader opened a safe space to discuss misconduct with their employee allowing him/her to share their version of the situation instead of just calling him/her to communicate a sanction. This suggests that despite the challenges previously described, Brazilian leaders value and are aware of the benefits of an open organisational culture within their teams and support an open dialogue between supervisors and employees for handling unethical issues.

Key findings

- Recent reforms have been implemented in Brazil to clarify and consolidate the senior civil service regime. Despite relevant improvements, there is still scope to strengthen integrity leadership, including with respect to the lack of systematic merit-based criteria and procedures to select and appoint senior civil servants, the lack of explicit references to integrity in the competences for leaders' framework and the fact that senior public servants' performance is not periodically and systematically assessed.
- Demand and offer of specific public integrity training targeting high-ranked officials is limited across the Brazilian federal administration. As a result, few high-ranked officials have participated in training on public integrity and even fewer have promoted their employees' engagement in public integrity training.
- Key elements of an open organisational culture in the Brazilian federal administration are weak, and challenges remain to effectively promote openness within the public sector: leaders have difficulties to communicate about integrity within their teams and engage in conversations regarding integrity concerns in their institutions, while civil servants do not feel safe enough to report misconduct.
- Differences observed between female high-ranked officials and male high-ranked officials regarding the level of comfort and security to discuss misbehaviour and report cases of corruption suggest the relevance of designing and implementing gender specific integrity policies to effectively encourage an open organisational culture.
- Despite the several challenges to promote an open organisational culture in the Brazilian federal administration, leaders value and are aware of the benefits of an open dialogue with their employees for handling unethical issues and concerns.

3

A strategy to promote integrity leadership behaviour in Brazil

This chapter provides recommendations to strengthen integrity leadership in the Brazilian federal public administration. Promoting integrity leadership can be enabled by including integrity as a core competence and performance indicator for senior civil servants. A regular staff survey could measure relevant dimensions to track progress and impact. Moreover, integrity leadership behaviour could be strengthened actively by implementing a strategy aimed at identifying and training integrity leaders in every public entity and connecting them through a dedicated network.

3.1. Promoting change

Evidence from theory and practice, as well as from our daily lives, suggest that the behaviour we observe from our direct peers and, in particular, from our leaders (our role models) matter for our own behaviour (Chapter 1). This has, at least, two practical implications when thinking of how to promote cultures of integrity in public entities: first, the good behaviour from leaders and peers needs to be visible (and the bad behaviour sanctioned) and second, influencing the behaviour of leaders as internal vectors can impact the behaviour of other employees, while these good practices could be reinforced through peer learning. As such, measures targeted at leaders' behaviour could be a particularly efficient means to achieve broader change in an organisation.

The following sections provide recommendations on how this could be achieved in the Brazilian federal public administration. First, Brazil could implement some basic foundations to enable an environment where working on integrity leadership will be easier. On the one hand, integrity could be included as a core competence and performance indicator for senior civil servants and, on the other hand, regular staff surveys could include relevant questions to get a sense of where different entities stand with respect to integrity leadership and to monitor progress and impact. Second, integrity leadership could be promoted more actively by implementing a strategy aimed at identifying and impacting on the behaviour of leaders in public entities.

3.2. Setting the foundations for integrity leadership

3.2.1. The Ministry of Management and Innovation in Public Services, in co-ordination with the CGU and the ENAP, could more explicitly include integrity in the competences for leaders and provide for periodical performance evaluations of senior public servants

Promoting integrity leadership requires governments setting up selection, appointment and promotion procedures to ensure the people appointed to leadership positions have an integrity profile. As mentioned in Chapter 2, Brazil has recently carried out reforms to strengthen leadership, but gaps remain in the areas of selection and appointment of senior public officials and strengthening of integrity competences. First, integrity is currently not explicitly included as a core competence for leaders, which weakens the selection, appointment and development processes of leaders. Although the competence “self-knowledge and personal development” includes a reference to “promoting ethical public service values such as accountability, integrity, rectitude, transparency and fairness” (ENAP, 2021^[54]), integrity could be placed more explicitly within this framework to ensure public institutions attract and select integrity leaders. For example, the competency framework in the New South Wales Government in Australia identifies five levels of integrity and the behaviours associated with each (Table 3.1).

Table 3.1. Act with integrity: A framework for assessment in New South Wales, Australia

Foundational	Intermediate	Adept	Advanced	Highly Advanced
<ul style="list-style-type: none"> • Behave in an honest, ethical and professional way • Take opportunities to clarify understanding of ethical behaviour requirements • Identify and follow legislation, rules, policies, guidelines and codes of conduct that apply to your role • Speak out against misconduct and illegal and inappropriate behaviour • Report apparent conflicts of interest 	<ul style="list-style-type: none"> • Represent the organisation in an honest, ethical and professional way • Support a culture of integrity and professionalism • Understand and follow legislation, rules, policies, guidelines and codes of conduct • Recognise and report misconduct and illegal or inappropriate behaviour • Report and manage apparent conflicts of interest 	<ul style="list-style-type: none"> • Represent the organisation in an honest, ethical and professional way and encourage others to do so • Demonstrate professionalism to support a culture of integrity within the team/unit • Set an example for others to follow and identify and explain ethical issues • Ensure that others understand the legislation and policy framework within which they operate • Act to prevent and report misconduct and illegal and inappropriate behaviour 	<ul style="list-style-type: none"> • Model the highest standards of ethical behaviour and reinforce them in others • Represent the organisation in an honest, ethical and professional way and set an example for others to follow • Ensure that others have a working understanding of the legislation and policy framework within which they operate • Promote a culture of integrity and professionalism within the organisation and in dealings external to government • Monitor ethical practices, standards and systems and reinforce their use • Act on reported breaches of rules, policies and guidelines 	<ul style="list-style-type: none"> • Champion and act as an advocate for the highest standards of ethical and professional behaviour • Drive a culture of integrity and professionalism across the organisation, and in dealings cross-government, cross-jurisdiction and outside of government • Define, communicate and evaluate ethical practices, standards and systems and reinforce their use • Create and promote a climate in which staff feel able to report apparent breaches of rules, policies and guidelines and act promptly and visibly in response to such reports

Source: (OECD, 2020^[18]); from New South Wales Government Public Service Commission, *The NSW Public Sector Capability Framework*, www.psc.nsw.gov.au/workforce-management/capability-framework/access-the-capability-framework/the-capability-framework, (accessed 22 February 2020).

Therefore, the Ministry of Management and Innovation in Public Services, in co-ordination with the CGU (to ensure coherence with integrity policies) and with the ENAP (to ensure coherence with training and learning offers), could review the competences for leaders in the federal public administration and ensure that integrity and other relevant competences for integrity leadership and an open organisational culture are more explicitly included in such framework. This could be done by breaking down the competences into sub-components to provide greater clarity and nuance to the qualifications within the current framework or by developing complementary guidelines that further describe the expected behaviours of leaders to uphold integrity while carrying out their public duties, in alignment with the current competences for leaders. Examples from other jurisdictions, like Canada, could be used by the Ministry of Management and Innovation in Public Services, the CGU and the ENAP as inspiration (Box 3.1).

Box 3.1. Ethical leadership as one of the Key Leadership Competencies in the Canadian Service

The Canadian Key Leadership Competencies (KLCs) define the behaviours expected of leaders in the Public Service to create and sustain a professional, ethical and non-partisan public service and serve as the basis for selection, learning and development, performance and talent management of executives and other senior leaders.

One of the KLCs Canadian executives and senior leaders are measured against is to 'Uphold integrity and respect'. This means that leaders are expected to exemplify ethical practices, professionalism, and integrity, as well as to build an open organisational culture in which employees are confident to seek advice, express diverse opinions and uphold collegiality. Examples of effective and ineffective behaviour to uphold integrity and respect are given for different roles (Table 3.2).

Table 3.2. Behaviours to uphold integrity for different executives and senior leaders in Canada

Deputy Minister	Assistant Deputy Minister	Director General	Director
<ul style="list-style-type: none"> Values and provides authentic, evidence-based advice in the interest of Canadians Holds self and the organization to the highest ethical and professional standards Models and instils commitment to citizen-focused service and the public interest Builds and promotes a bilingual, inclusive, healthy organisation respectful of the diversity of people and their skills and free from harassment and discrimination Exemplifies impartial and non-partisan decision-making Engages in self-reflection and acts upon insights 	<ul style="list-style-type: none"> Values and provides authentic, evidence-based advice in the interest of Canadians Holds self and the organisation to the highest ethical and professional standards Models and builds a culture of commitment to citizen-focused service and the public interest Builds and promotes a bilingual, inclusive, healthy organisation respectful of the diversity of people and their skills and free from harassment and discrimination Exemplifies impartial and non-partisan decision-making Engages in self-reflection and acts upon insights 	<ul style="list-style-type: none"> Values and provides authentic, evidence-based advice in the interest of Canadians Holds self and the organisation to the highest ethical and professional standards Models commitment to citizen-focused service and the public interest Creates opportunities that encourage bilingualism and diversity Advances strategies to foster an inclusive, healthy organisation, respectful of the diversity of people and their skills and free from harassment and discrimination Exemplifies impartial and non-partisan decision-making Engages in self-reflection and acts upon insights 	<ul style="list-style-type: none"> Values and provides authentic, evidence-based advice in the interest of Canadians Holds self and the organisation to the highest ethical and professional standards Models commitment to citizen-focused service and the public interest Creates opportunities that encourage bilingualism and diversity Implements practices to advance an inclusive, healthy organisation, respectful of the diversity of people and their skills and free from harassment and discrimination Exemplifies impartial and non-partisan decision-making Engages in self-reflection and acts upon insights

Source: (Government of Canada, 2016^[55]), adapted by OECD authors.

Additionally, a list of examples of effective behaviours associated with the KLCs are given for the Supervisor and Manager roles. Although there is no policy requirement for supervisors and managers to be assessed on the demonstration of the KLCs, the aim is to help them to identify their learning and development needs and to inform career planning (Table 3.3).

Table 3.3. Guidance for Canadian supervisors and managers in the federal public service

Managers and Supervisors
<ul style="list-style-type: none"> • Values and provides authentic, evidence-based advice in the interest of Canadians • Holds self and the organisation to the highest ethical and professional standards • Models commitment to citizen-focused service and the public interest • Supports the use of both official languages in the workplace • Implements practices to advance an inclusive, healthy organisation, that is free from harassment and discrimination • Promotes and respects the diversity of people and their skills • Recognises and responds to matters related to workplace well-being • Carries out decisions in an impartial, transparent and non-partisan manner • Engages in self-reflection and acts upon insights

Source: (Government of Canada, 2016_[55]), adapted by OECD authors.

Finally, list of examples of generic ineffective behaviours for all roles are given:

- places personal goals ahead of Government of Canada objectives
- shows favouritism or bias
- does not take action to address situations of wrongdoing
- mistreats others and takes advantage of the authority vested in the position.

Source: (Government of Canada, 2016_[55]).

Second, as mentioned in Chapter 2, public servants who occupy high-level positions within the Brazilian federal administration are currently not being evaluated under the existing performance evaluation framework. Although there are some public entities that have voluntarily introduced performance assessments for their leaders, such as the Administrative Council for Economic Defence (*Conselho Administrativo de Defesa Econômica*, CADE) that implemented a pilot assessment of performance of selected leaders in 2019 and 2020, most senior civil servants are not being evaluated. However, once leaders are selected and appointed, they require support and reinforcement to be integrity leaders (OECD, 2020_[18]). To do so, one of the available tools are performance agreements and assessments. To ensure that performance systems promote and reward integrity leadership, these should not only focus on *what* leaders achieve, but also on *how* they achieve it (OECD, 2020_[18]).

Aware of the importance of conducting performance evaluations of senior civil servants of the federal administration, the former Ministry of Economy conducted a leadership performance assessment pilot with the participation of around 50 of its leaders. This pilot started in 2020 and included three cycles of evaluation in which leaders' performance was assessed against annual goals set at the beginning of the cycle and the competences for leaders' framework. Several conclusions were drawn from this pilot, including the importance of making the performance assessment process for leaders simple and intuitive, the high rotation of senior public officials that creates challenges for a continuous and impactful evaluation, and the need to strengthen an open organisational culture in which constructive feedback is welcomed.

Considering this as well as the main conclusions derived from the leadership performance assessment pilot, the Ministry of Management and Innovation in Public Services could provide for the periodical evaluation of senior civil servants' performance by making it mandatory for all leaders within public institutions of the federal administration. Moreover, as in a growing number of OECD countries, it could be considered to involve other stakeholders in the performance evaluation process of senior civil servants beyond the direct supervisor, including direct subordinates.

As a first step, the Ministry of Management and Innovation in Public Services should consider a revision of the current performance evaluation system, including simplifying performance assessment as recommended in the OECD Public Service Leadership and Capability Review of the OECD (OECD, 2023^[50]). Then, the Ministry of Management and Innovation in Public Services could consider developing specific procedures, guidelines and formats to ensure homogeneity across the federal administration, including criteria aimed at both ensuring leaders achieve specific deliverables and goals linked to integrity as well as testing for their integrity and moral reasoning (balance between *what* leaders achieve and *how* they achieve it). Box 3.2 provides an overview of some tools that can be used to implement such integrity checks. To ensure coherence with other efforts of the Ministry of Management and Innovation in Public Services, the performance evaluation system for leaders could be developed as part of the broader reform aimed at unifying the performance evaluation framework of the federal administration.

Box 3.2. Tools to implement integrity checks

Public organisations in OECD countries use a variety of targeted tools to implement integrity checks and assess personal character:

- use of uniform curriculum vitae formats, allowing to apply integrity filters to ease identification of suitable candidates
- pre-screening integrity test (e.g. online), personality tests or similar examinations, as a first step to be considered for the position, and/or as input into the final decision
- interview questions asking candidates to reflect on ethical role models they have had previously in the workplace, and/or to discuss ethical dilemmas they have faced and how they reacted to them
- situational judgement tests and questions that present candidates with a morally ambiguous situation and have them explain their moral reasoning
- role-play simulations and gamification to be conducted in an assessment centre
- reference checks which include questions related to ethical decision making and assessment from peers in previous positions on the ethical nature of the person and their ability to manage others ethically
- questions that enable the candidate to demonstrate awareness of and model moral management behaviour (recognising that being an integrity leader is not only about being a sound “moral person”, but also about actively role-modelling ethical decision making, communicating about ethics to employees, using rewards and sanctions to promote ethics, and giving employees an appropriate level of discretion and guidance to make their own ethical decisions).

Source: (OECD, 2023^[56]; OECD, 2020^[18]).

Moreover, once a mature performance assessment system covering senior civil servants has been set up (OECD, 2023^[50]), the integrity component of performance assessments could be reinforced by rewards and sanctions (OECD, 2020^[18]). For instance, senior public officials who are performing well on integrity could be identified for career development opportunities, in particular, to positions of higher ethical intensity. In turn, those senior public officials with low assessments should be given improvement opportunities and, if necessary, removed from their position if significant risks are identified (OECD, 2020^[18]).

3.2.2. The CGU could measure dimensions of integrity leadership through a regular staff survey

To identify good and bad leaders in terms of integrity, audits, administrative data collected by the CGU, reporting channels and surveys can be used in a complementary manner. Internal audits can shed light on systemic weaknesses in the organisation related to “the tone-at-the top”, the first attribute of a control environment in the COSO model, and can help assessing ethical climates (Kgomo and Plant, 2015^[57]). Reporting channels focus more on unveiling individual cases of misconduct. Regular staff surveys, in turn, can provide a broader picture on where an organisation stands with respect to integrity leadership. Indeed, social scientists have been debating over the past years on the best approach to measure integrity leadership and several useful questionnaires and scales have been developed to measure it (Box 3.3).

Box 3.3. Measuring integrity leadership

Tools to measure integrity leadership can be divided into three broad types (Argyropoulou and Spyridakis, 2022^[58]): those in which the leaders evaluate themselves (self-referential), those in which the sub-ordinates or other low-ranking leaders rate the leader (hetero-referential) and those that combine the first two and add evaluations by senior leaders and colleagues (360 degrees method).

Some well-known measurement tools are:

- The **Ethical Leadership Scale (ELS)** measures if leaders exhibit high ethical standards, display fair treatment of employees, and hold employees accountable for ethical behaviour (Brown, Treviño and Harrison, 2005^[22]). The ELS consists of ten items which measure different aspects, each of them scaled from 1 (“highly unlikely”) to 7 (“highly likely”). The scale is unidimensional and hetero-referential.
- The **Ethical Leadership at Work Questionnaire**, developed by (Kalshoven, Den Hartog and De Hoogh, 2011^[59]), distinguishes between seven types of behaviours: fairness, power-sharing, role clarification, people orientation, ethical guidance, and environmental orientation. The survey consists of 38 items on a 7-point Likert scale measuring these behaviours.
- The **Ethical Leadership Questionnaire** measures ethical leadership by using a 15 items survey, each of them with a 6-point Likert-style format (Yukl et al., 2013^[60]). Specifically, the survey allows us to understand the degree of emotional support between a leader and a follower and how the leader influences work unit performance. The survey is hetero-referential and provides a composite score.
- The **Broad Ethical Leadership Scale** measures styles of leadership linked with ethical or integrity leadership (Shakeel, Kruijen and van Thiel, 2020^[61]). These leadership styles (virtuous, positive and authentic, “moral manager”, professionally grounded, social responsibility and transformational) are measured through 48 items on a Likert scale and is self-referential.

There are several other instruments which measure concepts related to integrity leadership along similar lines (Argyropoulou and Spyridakis, 2022^[58]).

Arguably, however, the measurements above could underestimate the prevalence of bad leaders, as they measure desirable ethical behaviours which could lead to virtually all managers receiving acceptable ratings (Kaiser and Hogan, 2010^[62]). Therefore, the measurement of integrity leadership could be complemented by a measure of unethical behaviour. For example, the **Perceived Leader Integrity Scale (PLIS)**, has 31 items that ask about abusive or unethical behaviour (Craig and Gustafson, 1998^[63]).

Source: (Argyropoulou and Spyridakis, 2022^[58]; Brown, Treviño and Harrison, 2005^[22]; Kalshoven, Den Hartog and De Hoogh, 2011^[59]; Yukl et al., 2013^[60]; Shakeel, Kruijen and van Thiel, 2020^[61]; Kaiser and Hogan, 2010^[62]; Craig and Gustafson, 1998^[63]).

Therefore, the CGU could build on previous and existing experiences – including the most recent 2022 CGU Perception Survey of Federal Civil Servants on Public Integrity (*Pesquisa de Percepção com Servidores Públicos Federais sobre Integridade Pública*), the CGU/OECD *Survey on integrity and leadership in the Brazilian Executive Branch* and the 2021 *Survey on Ethics and Corruption in the Federal Public Service* – to develop a regular integrity staff survey. In addition, experiences from other relevant stakeholders – including the Secretariat of Personnel Management and Performance (*Secretaria de Gestão de Desempenho de Pessoal*, SGP) of the former Ministry of Economy with its 2020 public sector wide survey – could also be considered to regularly collect information on integrity leadership. This survey was conducted by the former SGP in partnership with ‘Great Place To Work’, the ENAP and the República Institute with the aim of understanding the perception that the public servants have and enabling management to develop people management policies to respond to the demands identified.

This regular integrity staff survey should include dimensions related to integrity leadership, measuring both desired and undesired behaviour. The results of such a regular staff survey could be used as an outcome to measure the performance of the Public Integrity System of the Federal Executive Branch (*Sistema de Integridade Pública do Poder Executivo Federal*, SIPEF),¹ track its progress in achieving cultures of public integrity and measure the impact of specific targeted interventions aimed at improving integrity leadership as discussed in the following section. To go beyond classical survey questions and to measure impact of strategies aimed at promoting integrity leadership, such a survey could include vignette experiments, as implemented, for example in the CGU/OECD *Survey on integrity and leadership in the Brazilian Executive Branch*. Vignette surveys allow for a more nuanced analysis able to elicit preferences and the drivers of stated hypothetical choices. Several research findings reported in this study are based entirely or in part on vignette experiments, for example (Stouten et al., 2013^[20]; Bhal and Dadhich, 2011^[43]). Indeed, such survey experiments perform well in simulating real world situation and understanding choices of respondents (Hainmueller, Hangartner and Yamamoto, 2015^[64]).

3.3. A road map for strengthening integrity leadership behaviour in Brazil

Beyond setting integrity as a core competence for leaders, establishing a performance assessment system that incorporates integrity and measuring integrity leadership, Brazil could take more specific actions to promote integrity leaders. The following section outlines a strategy which is based on the analysis carried out in Chapter 2 and relies on the assumption that individuals form their values and adapt their behaviour through socialisation by observing and interacting with peers and role models. The activities proposed in the strategy are divided into three steps. Together, the foundations for integrity leadership and the three-step strategy are expected to result in more committed and better-prepared senior public servants in terms of public integrity and, through them, contribute to promoting cultures of organisational integrity and openness in the federal administration in Brazil.

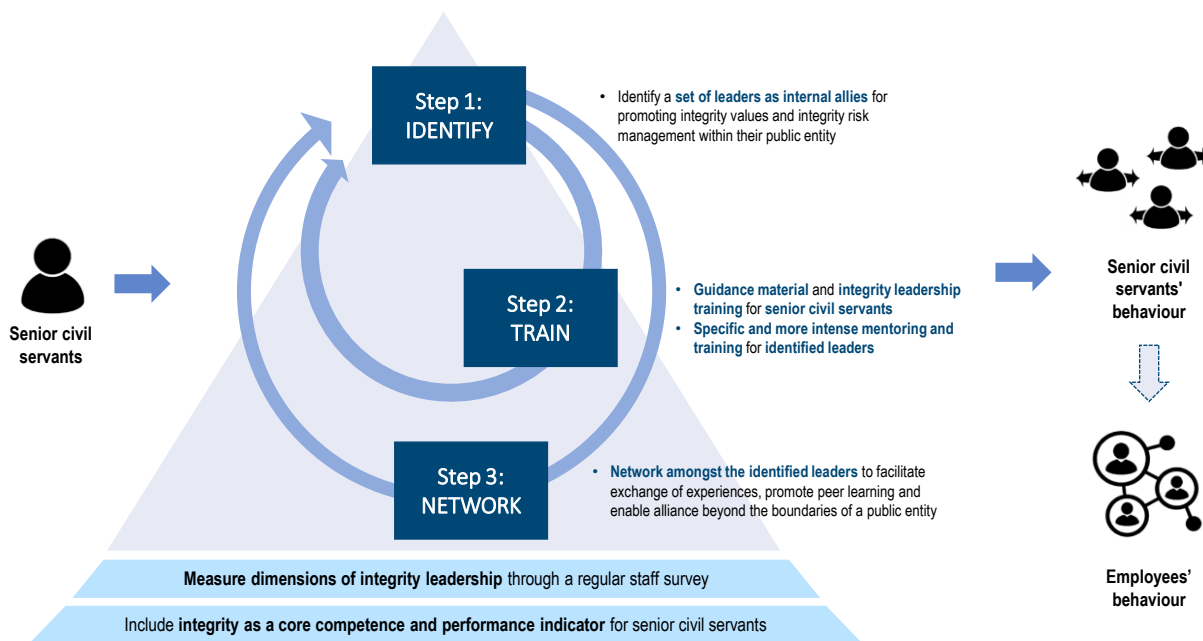
The next sections provide more details for each step of the strategy. To fine tune and ensure that the measures unfold the desired impact, the CGU could consider implementing a pilot programme by first selecting a subset of public entities where the strategy for strengthening integrity leadership behaviour could be tested. Lessons from the pilot could then lead to improvements in the different steps before implementing the strategy at scale in the federal administration through the SIPEF.

The steps of the strategy, summarised in Figure 3.1, are building upon one another to increase the likelihood of achieving the desired impact:

- **Identification:** The first step consists in identifying potential integrity leaders within a public entity. By being identified as an integrity leader, the senior civil servant feels motivated and more committed to the values of the institution and to actively promoting these values within their teams. In turn, such integrity leaders may be better placed to transmit the messages related to integrity policies to the employees.

- **Training:** In the second step, both senior civil servants and the identified integrity leaders are trained. Senior civil servants could be reached effectively through existing programmes, while integrity leaders could be trained through a more specific and intensive training and mentoring programme. By receiving targeted training, the selected leaders build additional skills and competences to self-reflect on their own behaviour as leaders and to better promote integrity and an open culture within their teams.
- **Network:** Finally, the third step relies on the CGU establishing a network between the integrity leaders. This step can be implemented in parallel with the training activities (second step). By building a network that meets regularly, the engagement of the leaders is maintained over time, participants develop additional capacities by learning from one another (peer learning) and leaders may be more committed because of the peer pressure.

Figure 3.1. A road map for strengthening integrity leadership behaviour in Brazil



3.3.1. Step 1: The Integrity Management Units (UGIs) could identify a set of leaders as internal allies for promoting integrity values and integrity risk management

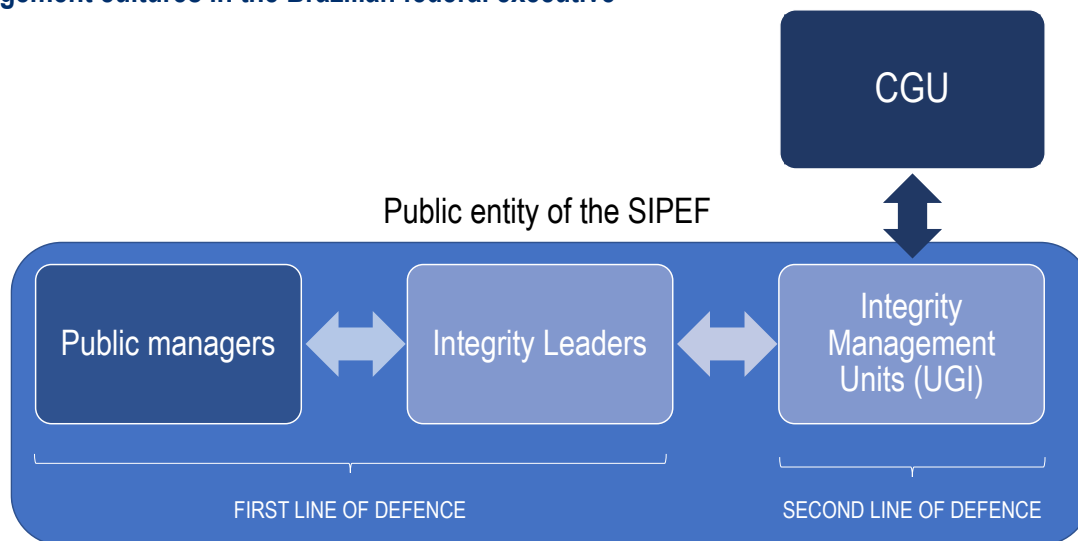
Dedicated “integrity actors” in public entities can contribute to overcome the challenge of mainstreaming integrity policies to ensure implementation in public entities and to promote organisational cultures of integrity. International experience shows the value of having a specialised and dedicated person or unit that is responsible and held accountable for the internal implementation and promotion of integrity laws and policies (OECD, 2009^[30]; G20, 2017^[65]; OECD, 2019^[66]). Recognising this, Brazil established in 2021 the SIPEF through Decree 10.756/2021. The SIPEF requires every public entity of the direct, autarchic and foundational administration at the federal level (*administração direta, autárquica e fundacional*) to establish an Integrity Programme (*Programa de Integridade*) and an Integrity Management Unit (*Unidade de Gestão da Integridade*, UGI).

As emphasised in an earlier OECD report (OECD, 2021^[15]) and in the forthcoming Integrity Review of Brazil, the SIPEF and the UGIs are an important step towards mainstreaming public integrity in the federal administration. The UGIs, as units of the second line of defence, have the potential to become the driving forces that can promote the implementation of integrity measures within the entities. Nonetheless, interviews conducted by the OECD with staff from the UGIs revealed that promoting change in the organisational cultures is perceived as a mayor challenge and that they would welcome the help of leaders

in the organisations as internal allies. While all public employees and in particular senior civil servants of course have responsibilities in upholding and promoting values, not all are likely or able to become leaders in that area.

Therefore, the UGIs could identify a set of senior civil servants within their entities that already are or show the potential of becoming such leaders. These integrity leaders could become the link between UGIs and other civil servants at all levels. The integrity leaders would be a source of knowledge and information and a role model to follow (Figure 3.2). These integrity leaders ideally should be part of the permanent staff of the public entity, they should also be highly valued by peers and employees and be recognised for their soft skills. The identification of the integrity leaders could happen actively by the UGIs, approaching senior civil servants that have shown interest and engagement and/or through a call-for-interest within the public entity. Also given the results of the CGU/OECD *Survey on integrity and leadership in the Brazilian Executive Branch* regarding the differences in the level of comfort and security to discuss misbehaviour and report cases of corruption between female high-ranked officials and male high-ranked officials, the UGIs should pay attention to select both female and male integrity leaders.

Figure 3.2. The roles of the CGU, the UGIs and integrity leaders in promoting integrity risk management cultures in the Brazilian federal executive



Source: (OECD, 2022^[14]).

Being identified as an integrity leader is likely to reinforce and support a positive self-image of the senior civil servant. Indeed, people typically act in ways that make them feel better about themselves (the “*ego effect*”) (Dolan et al., 2012^[67]). Unconsciously, this may contribute to increase the motivation and ownership of the leaders to the integrity policies and their commitment to communicating and promoting them actively. It may also impact positively on their own ethical behaviour, reinforcing their credibility as models of integrity.

In addition, such recognised and valued integrity leaders are likely to be taken more seriously by employees, raising the likelihood that their messages will be followed. Indeed, research evidences that the source of information matters (the “*messenger effect*”): the authority of the messenger (the integrity leader), the existence of shared characteristics between messenger and receiver (e.g. belonging to the same public entity), the consistency of the messenger’s behaviour over time (does the integrity leader really behave the way he/she speaks?) and the sympathy for the messenger all make it more likely that the messages coming from such integrity leaders will be taken more seriously and will be followed (Dolan et al., 2012^[67]; OECD, 2020^[37]).

3.3.2. Step 2: The CGU could partner with the ENAP to develop and provide integrity leadership trainings for senior civil servants and in particular for the identified integrity leaders

Obviously, promoting integrity leadership requires supporting people in leadership positions to carry out their functions as integrity leaders (OECD, 2020_[18]). This includes providing leaders with training opportunities on aspects of the government's integrity standards and system, as well as providing them with opportunities to further develop relevant skills of managers for integrity. As discussed above, managers for integrity are role models who discuss integrity issues openly, who reward good behaviour and who empower their employees to make ethical decisions (OECD, 2020_[18]). At the same time, as emphasised in Chapter 1, such trainings should be designed and implemented carefully: ethical leaders should not feel as “morally superior” compared to their employees as a result of the trainings (Stouten et al., 2013_[20]). To achieve this, governments can provide leaders with training opportunities to develop relevant skills such as guiding and advising employees on integrity concerns, communicating openly with employees, discussing moral decision making with colleagues, and building trust among employees to express any grievances.

To be effective, three aspects are essential when designing and implementing integrity training: the timing and frequency of the training, the target audience and the content and delivery methods (OECD, 2020_[18]). Regarding the latter, governments can use several methods to develop the skills of integrity leadership (Table 3.4). For instance, while lectures or online learning modules can cover various aspects of the integrity standards and system in place to ensure that there is a common understanding of leaders' integrity obligations and the mechanisms and tools available to help managers meet them, case studies of real leaders facing real ethical dilemmas can be used to teach and practice moral reasoning.

Table 3.4. Main training methods

Method	Approach	Description
Lecture	Rules-based	Public officials are offered lecture-format courses on integrity standards, rules, and administrative procedures to reinforce their understanding of ethical concepts and principles of public service. Trainers are mainly the ones intervening.
E-learning module / online course or massive open online course	Rules-based	Public officials are offered online courses or modules through an online platform or website on ethical standards, rules, and administrative procedures to reinforce their understanding of ethical concepts and principles of public service. Trainers are mainly the ones intervening.
Coaching and mentoring	Combined	Through peer feedback and discussions, junior public officials are given the opportunity to partner with a senior manager with proved ethical conduct, motivating ethical behaviour and helping to develop ethical awareness to foresee and resolve dilemmas.
Ethical dilemma case studies and discussions	Combined	Based on a described situation or scenario or on non-didactic support such as a video, public officials are encouraged to identify integrity and ethical issues and discuss how to address and avoid them. The trainer acts as a facilitator with the trainees, sharing views and discussing the dilemmas.
Simulation game, role-playing and scenario	Values-based	Public officials are given a scenario, an issue to deal with or a specific function and they are asked to perform it as if they were in a real case situation. The trainer acts as a facilitator only and trainees do most of the work, acting in an inductive way.

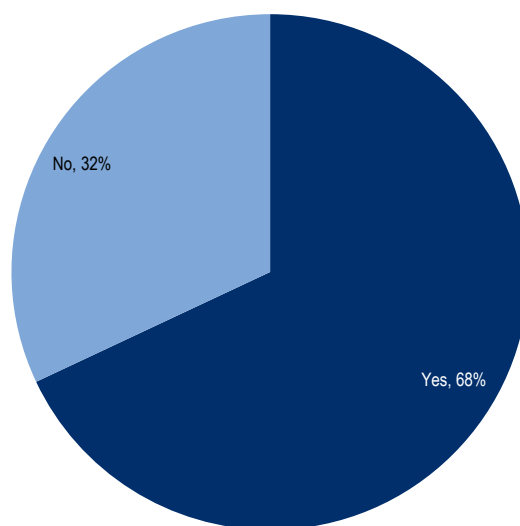
Note: Rules-based methods aim to impart knowledge about specific integrity standards, rules and administrative procedures that exist to guide integrity in the public sector; values-based methods focus on developing attitudes and behaviours in response to potential integrity issues that public officials may encounter while carrying out their duties; and combination methods, focus on providing a combined experience in which trainees are offered courses but also participate actively in sharing views and discussing dilemmas

Source: (OECD, 2020_[18]).

When designing and implementing integrity trainings, it is important to consider the monitoring and evaluation of the training outcomes (OECD, 2020^[18]). This includes monitoring and evaluating the quality of training activities (what participants and trainers thought and felt about the training) as well as their impact (the development of knowledge, skills and attitudes resulting from the training, the extent of behaviour and capability improvement, and the impact on work environment or results).

As previously mentioned and evidenced through the CGU/OECD *Survey on integrity and leadership in the Brazilian Executive Branch* (Figure 2.1), Brazilian senior civil servants currently do not participate very often in integrity trainings, which affects the possibility to deepen their knowledge on the integrity standards and system in place and further develop relevant integrity leadership skills. This contrasts with a great interest in participating in integrity related training (Figure 3.3), suggesting the need to increase and diversify the offer of integrity trainings for senior civil servants.

Figure 3.3. The interest amongst Brazilian senior civil servants in trainings or activities on integrity leadership



Source: CGU/OECD *Survey on integrity and leadership in the Brazilian Executive Branch*.

Therefore, the CGU, the ENAP and the UGIs could together develop and implement a two-pronged approach to building skills and capabilities for integrity leadership in the federal administration, by:

- Including integrity more explicitly into existing programmes, senior civil servants could be introduced and supported in their roles both as models and managers of integrity.
- Acknowledging, however, that not all senior civil servants are likely to be interested nor able to become integrity leaders within their entities, a more specific training and mentoring programme could be implemented for the integrity leaders identified by the UGIs as internal allies.

Brazil could target senior civil servants through already existing programmes to raise awareness and provide general guidance to leaders

Senior civil servants could be reached effectively through existing programmes, such as the CGU's campaign "We Are All Integrity" ("*#Integridade Somos Todos Nós*") and the ENAP's LideraGov Programme (Box 2.1). The former could aim at raising awareness on the role senior civil servants have within the integrity system both as models and managers of integrity, while the latter could be used to help senior

civil servants further develop specific skills and capacities needed to become integrity leaders and encourage an open organisational culture within their teams.

Box 3.4. Championing an integrity culture: The Senior Executive Services Integrity Masterclass Series

In May 2022, the Australian Public Service Commission (APSC) partnered with the Australia and New Zealand School of Government to launch the Senior Executive Services (SES) Integrity Masterclass Series. This assists senior leaders from the Australian Public Service (APS) to strengthen integrity culture and capability within their organisations and across the wider public service. While every member of the APS is obliged to act with integrity, SES leaders – as stewards of organisational culture – play an important role in setting expectations and modelling behaviours.

With this in mind, the APSC developed the SES Integrity Masterclass Series to equip SES participants with the knowledge and tools needed to build key integrity capabilities on both individual and organisational levels. The series comprises three masterclasses, with modules delivered online and in-person. The modules include an opening address from the APS Commissioner, a panel discussion with prominent APS integrity experts, videos, and a face-to-face workshop.

On completion, participants have the knowledge and tools to:

- Champion integrity – cultivate an environment where employees feel confident to raise integrity concerns and have positive and empowering conversations about integrity.
- Lead with integrity – foster a positive and collaborative working environment conducive to high performance.
- Promote integrity – implement tools and resources to build the integrity capability of teams and organisations.

Source: (Australian Public Service Commission, 2022^[68]); <https://www.apsc.gov.au/working-aps/state-of-service/2022/report/chapter-1-strong-foundations/13-integrity-all-aps-does>.

Regarding the “We Are All Integrity” campaign, the CGU could consider developing a specific module on “integrity leadership”, clarifying that leaders are expected to both uphold the values underpinning public service and communicate openly about integrity within their teams while giving employees opportunities to safely voice their opinions and discuss their integrity concerns. Particular examples of expected behaviours could be included for different leadership positions or situations that leaders may encounter in their day-to-day activities.

Regarding the LideraGov Programme, the Ministry of Management and Innovation in Public Services and the ENAP could consider involving the CGU in future trainings and introducing specific modules within the Programme’s structure on how leaders can promote integrity, encourage employees to seek guidance and come forward with concerns and new ideas. For instance, specific modules could be introduced within the leadership competence “team engagement” and the transversal competence “communication” to highlight how future leaders can engage, encourage and empower employees with the aim of building an environment where people have a shared vision and feel safe to share their concerns.

Generally speaking, five leadership skills (technical, conceptual, interpersonal, emotional intelligence and social intelligence) can enhance individual and organisational integrity standards (Haq, 2011^[69]). When developing the integrity training modules, the ENAP and the CGU could use these skills as a guidance to ensure that relevant skills are included and effectively developed (Table 3.5).

Table 3.5. Leadership skills leading to enhanced ethics in the public service

Leadership skills	Enhanced ethics
Technical	Responsiveness, Rule of law, Accountability, Transparency
Conceptual	Ethical Decision Making, Reliability, Resolve Ethical Dilemmas
Interpersonal	Diffuse and Establish Ethical Values
Emotional intelligence	Impartiality, Protection of Public Interest, Integrity
Social intelligence	Compassion, Fairness

Source: (Haq, 2011^[69]).

More specifically, in Brazil, integrity leadership training could cover the following dimensions:

- Dimension 1: presentation of Brazilian public administration's seven core integrity values (*Valores do Serviço Público Federal*) and the role leaders play in fostering their day-to-day application by public officials. The core values are engagement (*engajamento*), integrity (*integridade*), impartiality (*imparcialidade*), kindness (*gentileza*), justice (*justiça*), professionalism (*profissionalismo*) and public vocation (*vocação pública*). Leaders will familiarise themselves with the Public Service Values, learn how to use these values as a moral compass in their daily activities and how to foster their use by their employees.
- Dimension 2: presentation of leaders' own potential cognitive biases and ethical blind spots. For example, the training could address the most common justifications to unethical practices (such as, linguistic euphemisms, ledger metaphor, "Everyone does it", among others) or how to avoid confirmation or proximity biases, for example. Participants could be offered a roadmap provided by senior leader's experience on how to identify and prevent these and other relevant biases.
- Dimension 3: identification of ethical dilemmas and conflict of interest (at the individual and collective level) that can trigger situations of cognitive dissonance and lead to dishonest behaviour. Leaders will learn how to manage these situations and raise awareness within their teams through ethical dilemma case studies and discussions. A good practice for trainings on ethical dilemmas are the dilemma training to public officials offered by the Agency for Government Employees in the Flemish Government: trainees are given practical situations in which they face an ethical dilemma with no clear path to resolution with integrity.
- Dimension 4: presentation of the importance of an open communication culture to discuss integrity inside a team ("Openness"). Leaders would be able to learn how to build and maintain a "safe space" to discuss integrity openly and sincerely in professional spheres.

In addition to this training, the CGU could complement such efforts by developing general guidance material (such as leaflets, toolboxes or websites) for senior civil servants on how to promote an open organisational culture and encourage employees to engage and voice their ideas and concerns. For example, leaders and managers could acknowledge errors, turning negatives into lessons learned, and publicly discussing what went wrong, and what can be done differently (OECD, 2020^[18]). Other options include moving beyond the "open door" policy, and speaking to employees in less formal settings, such as over a coffee or lunch. Evidence has found that an open door policy rarely achieves the desired effect of creating more openness, as it still enforces a power dynamic that is difficult to overcome (Detert and Burris, 2007^[70]; Detert and Treviño, 2010^[71]). Other approaches include making leaders more accessible to employees at all levels. For example, in Victoria, Australia a "reverse mentoring" programme was piloted by the Public Sector Innovation Team: senior executives were matched with more junior staff, with the objective of learning from them and taking in different perspectives (OECD, 2020^[18]). The practice from New South Wales (Australia) to strengthen openness at the workplace could be used as a further inspiration (Box 3.5).

Box 3.5. Guidance for managers to strengthen an open working environment: Positive and Productive Workplace Guidelines in New South Wales, Australia

Recognising the impact that managers' behaviour can have on organisational culture and employee attitudes and behaviours, the Public Service Commission of New South Wales, Australia emphasises the behaviour of managers in their Positive and Productive Workplaces Guideline. Specifically, the guidelines propose some concrete actions at the management level, including:

- Ensure leaders understand the importance of values and organisational culture in achieving outcomes.
- Require leaders to behave in an exemplary fashion.
- Ensure leaders implement the organisation's values in their areas of responsibility.
- Discuss behaviour and acceptable standards of ethics and conduct at regular team meetings.
- Expect leaders and managers to be alert for any signs or reports of unreasonable behaviour and to take quick, informal and discreet action to draw it to the person's attention.
- Expect leaders and managers to treat complaints as potential symptoms of systemic issues rather than seeing them as a burden or evidence of a lack of loyalty in the workplace.
- Provide development for managers in holding respectful conversations, managing workplace conflict, providing constructive feedback on work performance, and speaking candidly to employees about unreasonable behaviour.
- Use scenario-based exercises to foster discussions among employees and managers about the expected standard of behaviour and organisational culture.
- Promote an understanding of diversity and inclusion based on helping all people to participate in the workplace and make a valued contribution to the group.
- Expect managers who observe or hear about unreasonable behaviour to act quickly and fairly. They need to have a confidential, clear and direct conversation with the person(s) about the behaviour, its impact on others, the expected standards of behaviour, the need for the behaviour to stop, and how the organisation can assist the person in changing their behaviour.

Source: (NSW Public Service Commission, 2017^[72]).

For the identified integrity leaders, the CGU could develop and implement, with support from the ENAP and the UGIs, a more specific and intensive integrity training and a mentoring programme

The more general integrity leadership training and guidance for senior civil servants recommended in the previous section would complement and reinforce the human resources policy on integrity competences and performance assessments for leaders mentioned above. However, the integrity leaders identified in step 1 should receive more targeted and intensive support, training and guidance.

In this sense, the CGU and the ENAP, with the support of the respective UGI, could develop and implement a specific training programme for integrity leaders. Such more specific training could include workshops, coaching and a mentoring programme tailored to each specific entity covering the topics listed in the previous section. Additionally, specific modules could also be developed to address some of the gender specific challenges, including sexual harassment. Research indicates for example that the social responses of co-workers or supervisors to sexual harassment can influence significantly the mislabelling, misreporting, or inappropriately punishing sexual harassment in some organisations (Goodmon et al.,

2020^[73]). Leaders, independent of their gender, should be aware of such social dynamics and learn how they can contribute to changing social responses within their teams and organisations. Leader should also learn how to address discomfort and insecurity to discuss misbehaviour and report cases of corruption and how to ensure a safe space that allow everybody to bring forward their concerns and feel empowered. Senior leaders from other entities, recognised for their trajectory and who have proven their skills both as models and managers of integrity could be invited along experts from the CGU, the ENAP and universities, to participate in specific sessions and share their experiences. For integrity leaders, such training sessions could be an opportunity to get in touch with other leaders who have been “exposed” to the climate of their organisation for several years and have learned to deal with the most common challenges.

In addition, senior leaders invited to participate as speakers could also be selected as mentors in a mentorship programme designed as part of the specific integrity leadership training programme. Such a mentoring programme has the potential to develop the “next generation” of integrity leaders (Brown, 2007^[74]). Indeed, research has confirmed that such ethical mentoring can positively impact the behaviour of the future integrity leader (Crawshaw et al., 2020^[75]). In Brazil, the mentorship programme could partner civil servants in junior position who show the potential to advance to leadership positions with integrity leaders and senior leaders. This not only aims to motivate ethical behaviour and develop ethical awareness in junior civil servants, but it can also strengthen senior public officials’ own ethical convictions and commitment to openness within public institutions. Indeed, evidence suggests that those who teach, also learn (the “*protégé effect*”) (Cohen, Kulik and Kulik, 1982^[76]; Fiorella and Mayer, 2013^[77]). Ideally, mentors should not be in direct hierarchical relation with the junior civil servants to ensure that mentees feel comfortable seeking advice, speaking freely and sharing their concerns. Moreover, considering the results of the CGU/OECD *Survey on integrity and leadership in the Brazilian Executive Branch* and that women have been historically underrepresented in senior management and middle management positions in the Brazilian federal administration (OECD, 2023^[50]; Leandro Rezende, 2020^[78]), the UGIs could pay attention to select both female and male civil servants in junior positions to participate from the mentorship programme, allowing for equal opportunities to become integrity leaders. In fact, also to follow Decree 11.443/2023, Brazil could consider broadening this concept of inclusion to ensure the participation of afro descendant and indigenous populations.

3.3.3. Step 3: Maintain engagement, promote peer learning and alliances: The CGU could initiate and promote a network amongst identified integrity leaders to facilitate the exchange of experiences and enable alliances beyond the boundaries of a public entity

Public service leadership is increasingly challenging and complex. Senior civil servants face several dynamic and complex policy issues whose causes and effects are blurred and interrelated – for instance, climate change, pandemics or income inequality and poverty. In this context, senior civil servants are expected to work across organisational boundaries, sectors and jurisdictions to tackle ongoing and emergent policy challenges, as well as to be able to learn as they go and quickly adapt to a rapidly changing environment (Gerson, 2020^[21]). In this sense, being able to look beyond their own organisation and collaborate through networks with other government actors and beyond, has become a relevant skill to face common challenges, adapt to changing environments and promote learning. Senior civil servants across several countries have established such networks aimed at learning from their peers and finding solutions to common problems in different fields (Box 3.6).

Box 3.6. Networks and peer support for senior civil servants in select counties

In **Estonia**, the Top Civil Service Excellence Centre was developed to support leadership across the top two tiers of the civil service bureaucracy. It began with a narrow focus on competency development but has progressively expanded to include a wider set of lifecycle interventions, including developing competency models, relationship management for potential candidates, recruitment, delivering competency assessments, being on interview panels, delivering coaching and leadership programmes, and the follow-up assessment activities. By bringing together top civil servants to participate in the different activities, the Centre has allowed the development of a trusted network. The ability to improve relationships across ministries was commonly cited as one of the most important outcomes of the Centre's activities. This is particularly important in Estonia where no hierarchical relationship exists among secretaries general and few formal structures to direct co-ordination and collaboration.

In **Finland**, secretaries general meet weekly on Monday mornings and organise special days with the Prime Minister and other high-level speakers for the broader senior civil service, providing different opportunities to network. For example, the Ministry of Finance organises an annual Public Management Day with high quality speakers. During this day, discussions take place between the different participants, including with invited mayors and municipal leaders, promoting networking and co-operation among the whole public sector. Finland has also developed more formalised small peer support groups, made up of approximately 10 leaders per each group, which meet approximately 4 times per year. Participants are stable for at least 2 years in the same group, allowing senior civil servants to talk openly about their experience in a comfortable and trusted environment. These groups also enable the sharing of innovations and collective problem solving.

In the **Netherlands**, the Senior Civil Service Bureau has set up "Intercollegiate Groups" to help senior civil servants learn from the insights of their peers. Senior civil servants can use these intercollegiate groups to access additional perspectives and experiences when in the thick of particularly complex leadership challenges. Groups of 6 senior civil servants commit to meet 12 times over a period of 2 years. These groups are each supervised by a professional coach, with 1-2 being present at each meeting to facilitate discussions. At each meeting, the group focuses on a particular senior civil servant and the challenge they face and use different tools to generate insights from the group, challenge assumptions and look at the problems from different perspectives.

Source: (Gerson, 2020^[21]).

Based on this approach, the CGU could initiate and promote a network amongst the integrity leaders across the federal administration to facilitate the exchange of experiences and enable alliances beyond the boundaries of a public entity. Participants could be encouraged to meet virtually (for instance, every two months) and in person (once or twice a year). Moreover, to promote discussion and ensure participants' involvement in the network, a subject of their interest could be selected in advance. Considering the limited time senior civil servants may have available, it is important to schedule the meetings in advance, ensure topics are interesting and relevant to senior civil servants, and make sure participants understand and appreciate the value the network adds to their personal and professional development.

Creating such a network amongst integrity leaders could have several benefits: It could allow leaders to share information, exchange experiences and learn from their peers, it could provide visibility to common challenges and support from outside one's own organisation, and it could ensure protection and peer support in finding and implementing solutions that promote public integrity. This is particularly important

for female leaders, who may feel particularly supported and protected by this network to overcome their fear and insecurity to discuss misbehaviour and report cases of corruption.

Together with a mentoring programme, having access to tailored experiential learning opportunities such as networking and peer support enriches theoretical learning approaches such as workshops and online modules. Indeed, the hands-on experience of senior civil servants in their day-to-day practice is a valuable source of information. Therefore, an integrity leadership network would complement the conceptual insights provided to the selected leaders by offering them more operational and concrete information emerging from the field and the possibility to directly exchange with their peers. Moreover, as the network would also engage leaders participating in trainings and workshops as well as senior leaders acting as mentors in the mentorship programme, it could be used as a dedicated space for exchanging practices and knowledge acquired during the leadership trainings and workshops.

The CGU could also consider establishing a password protected online space for the network, where integrity leaders can search and contact their peers, post information and materials or questions. This space could also be appropriate to identify the main integrity challenges leaders face and collect suggestions on how to overcome integrity barriers (normative, behavioural, organisational, etc.). As such, the network could become a key ally for the CGU, as the central organ of the SIPEF.

Key recommendations

- To set the basic foundations to enable an environment for integrity leadership in the federal administration:
 - The Ministry of Management and Innovation in Public Services, in co-ordination with the CGU and the ENAP, could more explicitly include integrity in the competence for leaders and provide for periodical performance evaluations of senior civil servants.
 - The CGU could measure dimensions of integrity leadership through a regular staff survey to get a sense of where different federal public institutions stand with respect to integrity leadership and to monitor progress and impact of specific targeted interventions.
- To further strengthen integrity leadership in Brazil, the following three-steps strategy could be implemented across public institutions of the federal administration:
 - Step 1: The UGIs could identify a set of leaders as internal allies for promoting integrity values and integrity risk management within their public entity.
 - Step 2: The CGU could partner with the ENAP to develop general guidance material on how to promote an open organisational culture and provide integrity leadership trainings for senior civil servants. Moreover, the CGU could partner with the ENAP and the UGIs to develop a specific and more intense mentoring and training programme for the identified leaders, tailored to each specific entity.
 - Step 3: The CGU could initiate and promote a network amongst the identified leaders to facilitate exchange of experiences, promote peer learning and enable alliance beyond the boundaries of a public entity.

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Annex A. CGU/OECD Survey on integrity and leadership in the Brazilian Executive Branch

Introduction

In June 2022, the Office of the Comptroller General of the Union (*Controladoria-Geral da União*, CGU) and the OECD implemented the *CGU/OECD Survey on integrity and leadership in the Brazilian Executive Branch*. The survey targeted senior civil servants of the Executive Branch, that is DAS-4, DAS-5, or equivalent positions, who in most cases directly supervised a work team within a public institution.

The survey included the following modules: on respondents' sociodemographic characteristics, participation in integrity training, exposure to unethical behaviours within public institutions and direct work teams, perception about the effectiveness of some integrity policies (e.g., UGIs, integrity programmes), perceptions about openness to dialogue, leadership style preferences, and integrity environment within public institutions and direct work teams. Additionally, the survey included a vignette experiment aimed at identifying relative determinants of dishonest behaviour perception amongst high-level officials of the Executive Branch in Brazil.

Methodology

The CGU and the OECD contacted the Integrity Management Units (*Unidades de Gestão da Integridade*, UGIs) of different federal entities and asked them to send a list of the relevant senior civil servants in their respective entities, including their names, position (DAS or FCPE) and contact details. Based on these lists, the OECD consolidated a unique database including information on 5 889 senior civil servants from 104 federal entities. These senior civil servants were then invited to participate in the survey designed by the CGU and the OECD via an email sent to their professional email. They were given a month (June 2022) to access a personal link to LimeSurvey and reply to the survey. 1 573 high-level officials located in the 26 Federal States and the Federal District provided answers to the survey via LimeSurvey, which corresponds to a response rate of 26.7%.

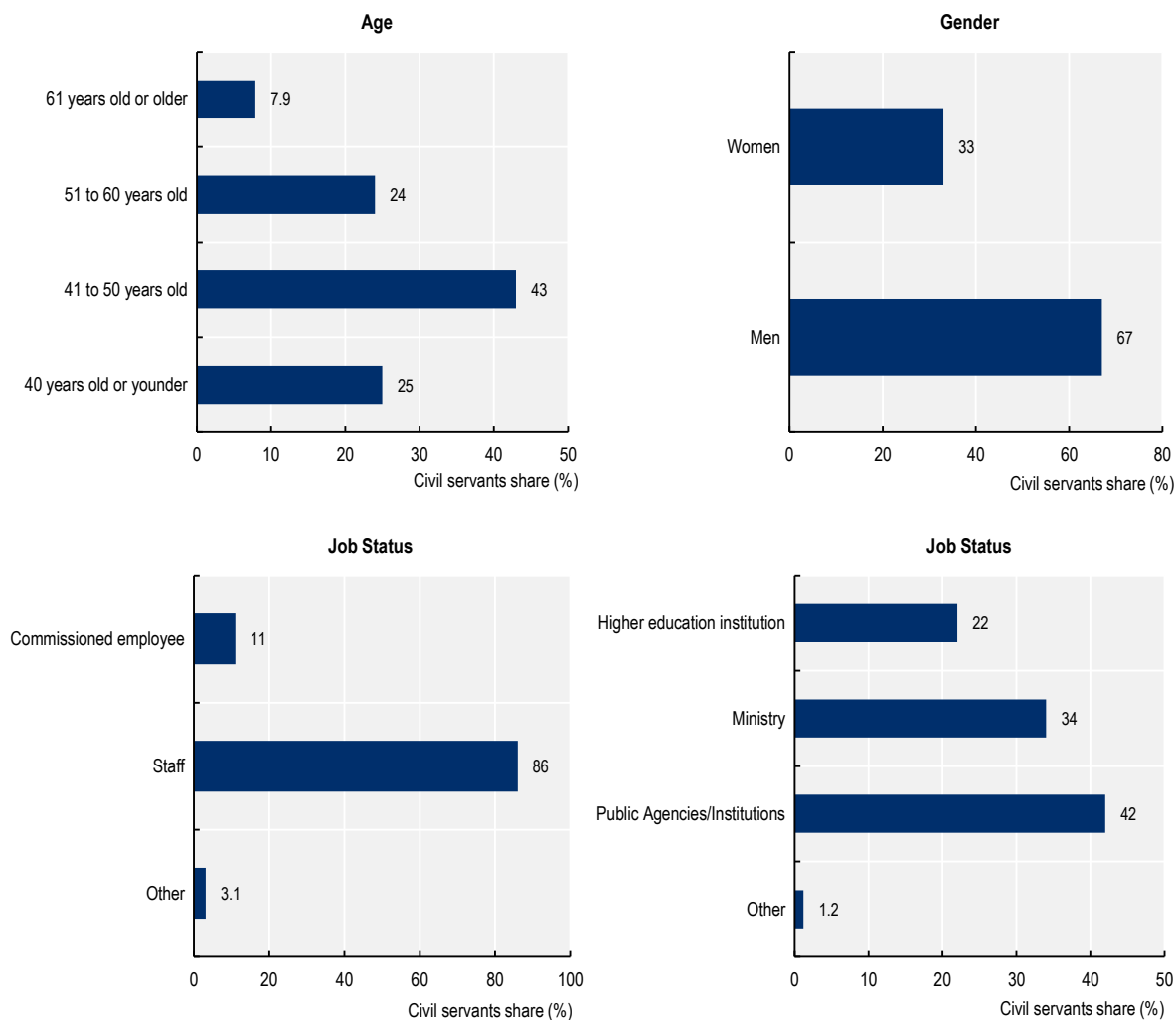
Characteristics of the sample

The surveyed senior civil servants were located in the 26 Federal States and the Federal District: the majority (52%) were located in Brasília D.F., followed by 12% located in Rio de Janeiro. The remaining 36% are distributed relatively homogeneously among the other 25 Federal States.

In terms of gender, age, job status and institution, Figure A.A.1 presents the general profile of the senior civil servants surveyed. Two thirds of the sample are men (67%) and one third (33%) are female; only 1 211 of the 1 573 participants answered to this question. Participants are mostly located in the “41 to 50 years old” interval (43%). The youngest official surveyed is 24 years old, while the oldest official surveyed is 78 years old. On average, surveyed officials are 47 years old. More than four-fifths of the sample are staff employees (86%), this is, current employees hired under a staff status. Officials surveyed belong to 104 public institutions located across the country. 42% of the sample works in a public agency/institution, 34% in ministries and 22% in higher education institutions.

Figure A A.1. General profile of high-level officials surveyed

Share of civil servants

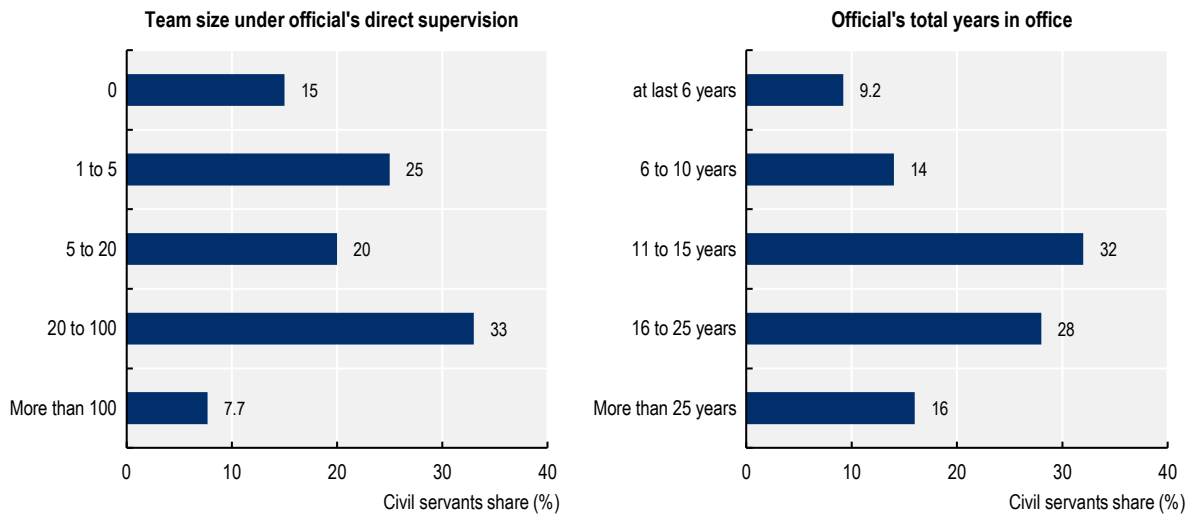


Source: CGU/OECD Survey on integrity and leadership in the Brazilian Executive Branch.

For this study, the degree of responsibility, defined as the size of the team the high-level official directly supervises, determines the leadership degree of the official. In the sample, 25% of officials surveyed supervise a small-size team (from 1 to 5 employees), 20% of officials surveyed supervise a team with 5 to 20 employees, 33% of officials surveyed are responsible for medium-size teams (from 20 to 100 employees) and 7.7% of officials surveyed are responsible for large-size teams (more than 100 employees) (Figure A A.2). Officials surveyed have a solid professional experience in the public sector: 76% of respondents have been serving in the public sector over 11 years (Figure A A.2).

Figure A A.2. Professional profile of high-level officials surveyed

Share of civil servants



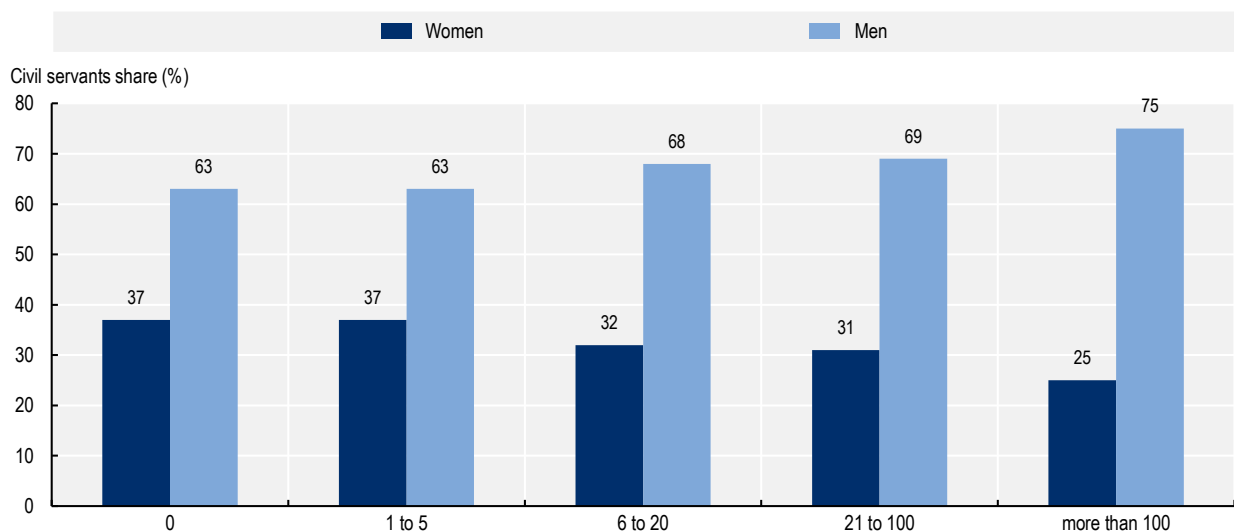
Note: 15% of the sample corresponded to Comissionados, this is, high-level officials who did not directly supervised a team by enacted as advisors. These are identified under the label "0".

Source: CGU/OECD Survey on integrity and leadership in the Brazilian Executive Branch.

One striking fact is that women are less likely to lead large teams than men (Figure A A.3), even when considering that the structure of the samples in terms of years in office and level of education is similar between men and women (Figure A A.4). Indeed, while 37% of small-size team teams are led by women, only 25% of large-size teams are led by female leaders.

Figure A A.3. Team size under direct officials supervision

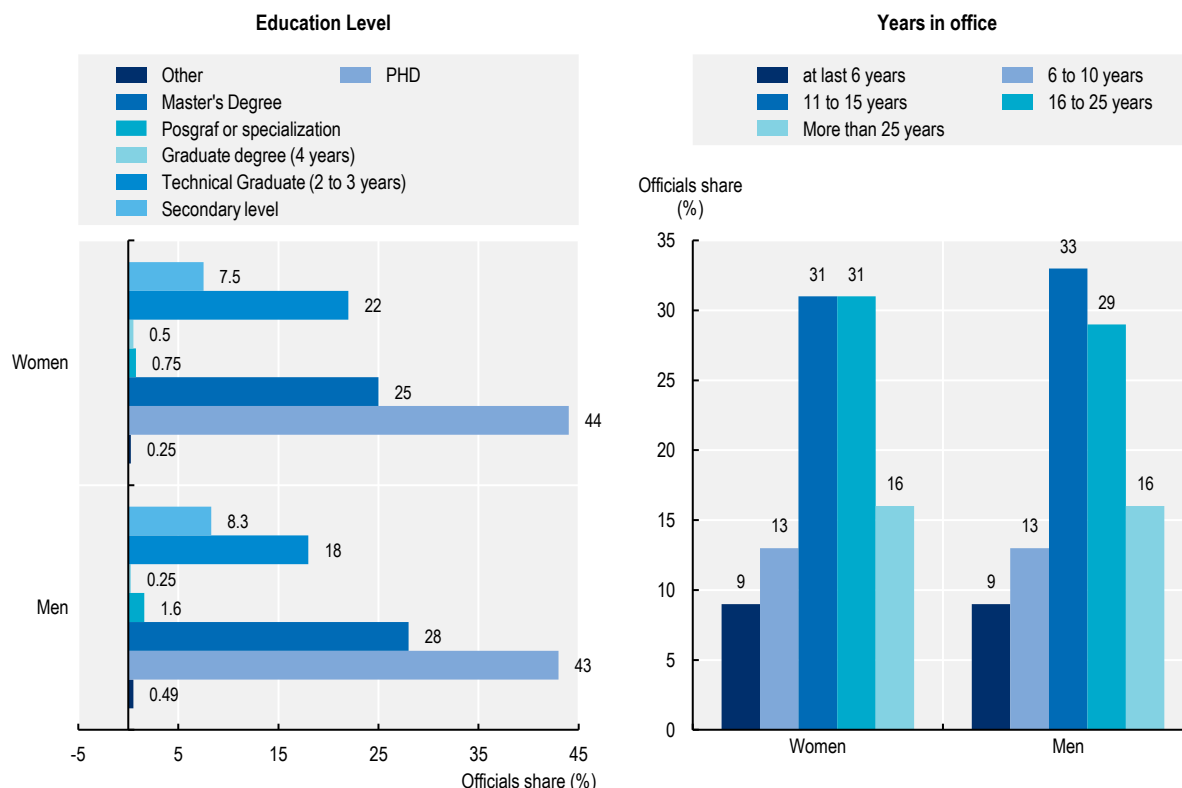
Share of civil servants



Note: Statistically significant relationship between gender and team since at a 5% confidence level.

Source: CGU/OECD Survey on integrity and leadership in the Brazilian Executive Branch.

Figure A A.4. Level of education and professional experience is similar between male and female high-level officials surveyed



Source: CGU/OECD Survey on integrity and leadership in the Brazilian Executive Branch.

Vignettes: Identification strategy and results

The vignettes experiment methodology consists in providing participants a series of fictive, short, and systematically varied scenarios (called “vignettes”) to elicit their beliefs, attitudes, or behaviours with respect to the presented scenarios, revealing their personal preferences (Atzmüller and Steiner, 2010^[79]). Participants’ reaction to each scenario allows to explore their judgment and identify the key determinants of moral judgment under unethical circumstances by high-level officials of the Brazilian Executive Branch.

1 257 out of the 1 673 senior civil servants who responded to the survey also participated in the vignettes experiment. In total, eight vignettes were randomly display to each participant. Participants were expected to give their opinion on a 1 to 10 scale, 1 meaning “totally accepted behaviour” and 10 meaning “totally unaccepted behaviour”, regarding each of the presented scenarios. The random character of the experiment allows to evaluate participants’ preferences across different scenarios.

The experiment included two vignettes:

- **Vignette 1** presented a situation where a public servant reveals confidential information to benefit private interests. Vignette 1 included eight scenarios, which vary according to the following three concepts: (1) the magnitude of the information disclosed, (2) the existence of a conflict of interest, and (3) the existence of a justification mechanism. Vignette 1 answers the following questions: Does the magnitude of the information disclosed matter? To what extent a conflict of interest is a determinant of moral judgement? Could a “for the greater good” justification mitigate peers’ reaction towards this unethical practice? Which of these concepts – (1) the magnitude of the information

disclosed, (2) the existence of a conflict of interest, and (3) the existence of a justification mechanism – is socially more severely punished?

- **Vignette 2** presented a situation where a leader reacts to an unethical behaviour by one of his/her employees. The survey respondent had to judge the behaviour of his peer senior civil servant. Vignette 2 also included eight scenarios, this time exploring (1) potential gender biases with regards to female senior civil servants, (2) work performance as a potential mitigation channel, also interpreted as a potential justification mechanism for unethical behaviour and (3) the importance of openness to dialogue from the leaders' perspective when it comes to reacting to unethical behaviour inside the senior civil servant's team. Vignette 2 answers the following questions: Does the gender of the senior civil servant biases the way his/her peers evaluate how well he/she handled the situation of misconduct? To what extent a "good work performance" mitigates leaders' reaction towards an unethical practice? How relevant do peers consider "openness to dialogue" when it comes to addressing an unethical situation? Which of these concepts – (1) gender of the senior civil servant involved in the situation, (2) work performance and (3) openness to dialogue – is socially more severely punished?

The experiment uses a multilinear regression, clustering errors at the individual level. The number of observations for each respondent is equal to the number of scenarios displayed, which are 8 in total (4 for each vignette). The following sections explain the identification strategy of each vignette as well as the results.

Vignette 1: Information disclosure case

The Identification Strategy of vignette 1 is the following:

$$ScoreV1_{ij} = a_{ij} + \beta_1 InformationDisclosureSeverity_{ij} + \beta_2 ConflictInterest_{ij} + \beta_3 PublicBenefitJustification_{ij} + e_{ij}$$

The variable $ScoreV1_{ij}$ measures the respondent's moral judgment on a scale from 0 to 10, 0 being a totally accepted behaviour and 10 a totally unaccepted behaviour, for a given subject i and scenario j . The variable Information Disclosure Severity $_{ij}$ (SL_{ij}) comprises two possible values, 0 and 1. Value 1 is taken when the scenario displays a more severe level of information disclosure. Conflict of Interest $_{ij}$ (CI_{ij}) is a dummy variable that takes the value 1 when the scenario includes a conflict of interest. The variable PublicBenefit $_{ij}$ (PB_{ij}) measures when a public servant justifies his/her misconduct as a form of public benefit ($PB_{ij} = 1$ then). To test the robustness of the results, a set of control variables to specifications (1) and (2) include gender, age, years in office, job status, team size under the senior civil servant's supervision and state of residency.

The results are displayed in Table A A.1. Overall, respondents severely condemn an information disclosure scenario with a score of 8.9 over 10, on average, with 10 being totally unacceptable. As presented in column (2), the degree of information breach is statistically significant at the 1% confidence level and its magnitude is small and equivalent to 7.3% of the average score (0.65/8.9). The variable Conflict of interest is not statistically significant, suggesting that the existence of a conflict-of-interest situation does not play a role in the moral judgment of information disclosure. Finally, the estimates suggest that to a small degree, the justification of "doing wrong for a greater good" holds. The coefficient is equal to -0.20 and statistically significant at the 1% confidence level. Results are robust when adding control variables which suggest that the randomisation of scenarios has a homogenised sample composition.

Table A A.1. Main results: Vignette 1

Variable	(1)	(2)
	Coeff.	Coeff.
Information Disclosure Severity	0.67***	0.65***
Conflict of Interest	0.004	0.007
Public Benefit Justification	-0.21***	-0.20***
Female		0.05
Age		0.01
Years in Office		0.01
Job status: Staff		0.45**
Jobs Status: Other		0.25
Team Size: 1 to 5		0.049
Team Size: 5 to 20		0.22
Team Size: 20 to 100		-0.10
Team Size: more than 100		0.10
Observations	5748	5439
Controlling for State (Fixed Effect)	No	Yes

Note: Confidence levels are shown as (*) at 10%, (**) at 5% and (***) at 1%. Errors clustered at the individual level.

Vignette 2: Leadership perception when addressing unethical behaviour

Vignette 2 uses the same econometric approach to explore the determinants of the senior civil servants' moral judgement. More precisely the Identification Strategy is:

$$ScoreV2_{ij} = a_{ij} + \theta_1 GenderBias_{ij} + \theta_2 OpenDialogue_{ij} + \theta_3 PerformanceJust_{ij} + e_i$$

The variable $ScoreV2_{ij}$ measures the moral judgment attributed to each scenario on a scale from 0 to 10, 0 being a totally accepted behaviour and 10 a totally unaccepted behaviour, for a given subject i and scenario j . Gender Bias $_{ij}$ (GB_{ij}) is a dummy variable that takes value 1 when the gender of the official is female, and 0 otherwise. OpenDialogue $_{ij}$ (OD_i) is also a dummy variable that stands for openness to dialogue when senior officials address an unethical situation inside their teams. The value of the variable is equal to 1 in case there is an open window for dialogue, and 0 otherwise. The variable $PerformanceJustif$ (PJ_i) is equal to 1 when the scenario includes a good work performance of the misbehaving employee, and 0 otherwise. To test the robustness of the results, a set of control variables to specifications (1) and (2) include gender, age, years in office, job status, team size under the senior civil servant's supervision and state of residency.

The results are displayed in Table A A.2. On average, vignette 2 displays a score of 3.6 over 10, which shows that, overall, the respondents tend to support the behaviour of their peers addressing an unethical situation in the scenarios. According to the estimations, the gender of the senior civil servant who leads the team in the scenario does not bias this judgement: the gender coefficient θ_1 is not statistically significant. Results further suggests that openness to dialogue of the leader in the scenario is very well perceived by the peers. Indeed, a scenario where the leader opens a space to discuss misconduct is significantly associated with a more positive judgement of the peer's behaviour (at the 1% level of confidence). The magnitude of coefficient θ_2 corresponds to a 64% decrease of its mean value. In other words, when leaders open the space for dialogue, they will be favourably judged by their peers with a score that decreases 64%, on average. This finding suggests that openness to dialogue inside teams is considered as a good behaviour. Finally, a good performance displayed by the employee could act as a

mechanism that justifies misbehaviour (*Metaphor of the ledger*). The coefficient θ_3 is small, negative and statistically significant at the 1% level.

Table A A.2. Main results: Vignette 2

Variable	(1)	(2)
	Coeff.	Coeff.
Gender Bias	0.062	0.069
Openness to Dialogue	-2.34***	-2.32***
Performance Justification	-0.30***	-0.30***
Female		0.19
Age		0.04***
Years in Office		-0.02*
Job status: Staff		0.73**
Jobs Status: Other		0.83
Team Size: 1 to 5		0.28
Team Size: 5 to 20		0.39
Team Size: 20 to 100		0.35
Team Size: more than 100		-0.15
Observations	5544	5471
Controlling for State (Fixed Effect)	No	Yes

Note: Confidence levels are shown as (*) at 10%, (**) at 5% and (***) at 1%. Errors clustered at the individual level.

Questionnaire [Original in Portuguese]

Dear participant,

You are about to begin the initial questionnaire for the study on integrity and public leadership (CGU-OCDE). Your responses are very valuable as they will enable the research team to identify the characteristics of leaders of Brazilian federal agencies and entities. The data provided within the framework of this questionnaire will be treated confidentially by the OECD research team only. There are no right or wrong answers in the questionnaire. We are interested in your honest opinion and experiences. Please take 20 minutes of your time to answer this questionnaire in complete peace of mind.

The OECD is committed to protecting the personal data it handles in accordance with its Personal Data Protection Rules (<https://www.oecd.org/general/data-protection.htm>). To exercise these rights, please contact Mr. Michael Donohue, Data Protection Officer (DPO) of the OECD at michael.DONOHUE@oecd.org.

Thank you for your participation in this study.

Module A. Professional Career

1. For how many years have you worked as a federal public servant? (*Only numbers can be used in this field. *Please enter your answer here. *If it is in months, please add decimals. For example, 0.5 for 6 months)

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2. What is your affiliation with the federal public service? (*Choose one of the following answers. *If you choose 'Other:' please specify your choice in the text field. *Please choose only one of the following options)
- Permanent
 - Commissioned only
 - Other _____
3. In which federal organ or entity do you work? (*Please choose one of the following answers. *Please choose only one of the following options)
4. How many people in your organisation are under your direct responsibility? (*Please choose one of the following answers. *Please choose only one of the following options)
- None
 - From 1 to 5
 - From 5 to 20
 - From 20 to 100
 - More than 100

Module B. Initial context

5. Have you participated in training or capacity building activities on topics related to integrity or ethics in public service in the last 5 years? (*Please choose one of the following answers. *Please choose only one of the following options. Some examples of issues addressed in training or capacity building activities are ethics, disciplinary system (sanctions and other disciplinary measures), conflict of interest, nepotism, transparency, integrity risk management, whistleblowing channels or channels for reporting or communicating integrity risks, among others).
- Yes
 - No
5. **bis.** How many trainings or capacity building courses have you attended in the last 2 years? (*Only answer to this question under the following conditions: The answer was 'Yes' in question '5. Have you participated in training or capacity building activities on topics related to integrity or ethics in public service in the last 5 years?'. *Only numbers can be used in this field. *Please enter your answer here)
- _____
6. In your opinion, how difficult do you find it to talk about unethical behaviours within your **work team**? (*Please choose one of the following answers. *Please choose only one of the following options. For example, discussing a risk of conflict of interest or asking a staff member to change an unethical behaviour)
- Very Difficult
 - Difficult
 - Easy
 - Very Easy

7. In your opinion, how difficult do you find it to talk about unethical behaviours within your **federal agency**? (*Please choose one of the following answers. *Please choose only one of the following options. For example, discussing a risk of conflict of interest or asking a staff member to change an unethical behaviour)
- Very Difficult
 - Difficult
 - Easy
 - Very Easy
8. Have you ever been informed about a dishonest or unethical act or attitude within your **work team**? (*Please choose only one of the following options)
- Yes
 - No
9. Are you aware of the existence of an Integrity Management Unit (UGI) in the **institution** where you work? (*Please choose only one of the following options)
- Yes
 - No
9. **bis.** How would you assess the relevance of UGI for your work and that the work of your team? (*Only answer to this question under the following conditions: The answer was 'Yes' in question '9. Are you aware of the existence of an Integrity Management Unit (UGI) in the institution where you work? *Please choose the appropriate response for each item). The UGI is:
- Very relevant
 - Relevant
 - Not relevant
 - Irrelevant
10. Would you be interested in participating in an integrity leadership programme in federal agencies and entities? (*Please choose one of the following options)
- Yes
 - No
11. Please choose one answer option for each of the following statements. **Within your institution...** (*Please choose the appropriate answer for each item)

	Totally disagree	Partially disagree	Neither agree nor disagree	Partially agree	Totally agree
People are honest					
People are respectful towards others' views					
People are supportive					
People prioritise the public interest over their individual interests when conducting their public duties					
People interact with their colleagues with kindness					

12. Please choose one answer option for each of the following statements. Within your **direct work team...** (*Please choose the appropriate answer for each item)

	Totally disagree	Partially disagree	Neither agree nor disagree	Partially agree	Totally agree
People are honest					
People are respectful towards others' views					
People are supportive					
People prioritise the public interest over their individual interests when conducting their public duties					
People interact with their colleagues with kindness					

13. In the last three years, have you been aware of any occurrence **within your institution** of (*Please choose the appropriate response for each item)

	No	Yes, once	Yes, several times
Influence peddling			
Misappropriation of public assets			
Use of confidential information			
Abuse of power			

Module C. Leadership Perception

14. In your opinion, what are the elements or characteristics that a leader in the civil service should have? (*All answers should be different and ranked in order. Please choose a maximum of 6 answers. Please number each box in order of preference, from 1 to 6)

- Efficient delegation and execution of objectives
- Social skills
- Attitudes of integrity
- Commitment
- Academic qualifications required for the execution of their function
- Analytical mind, self-reflection and openness to dialogue

15. In your current role, which of the following do you consider to be most important? (*All answers should be different and ranked in order. Please choose a maximum of 3 answers. Please number each box in order of preference, from 1 to 3)

- To lead with openness to dialogue and tolerance
- To lead with an iron fist and know how to set limits
- To lead with integrity and values

Module D. Vignette experiment, presentation of scenarios

You now have to assess 8 scenarios that reflect situations in the public sector. The scenarios are similar but not identical. Please read each one carefully before answering.

Vignette 1: Aurélio is a public agent. He was informed in a high-level meeting of the government's decision to devalue the Real to reactivate Brazilian exports.

- **Scenario A:** Aurélio decides to communicate the date of the operation to **two companies** that decide to buy a large amount of Dollars on the market, before the official announcement of this news and, consequently, **benefit** from the devaluation of the Real. **He is on the board of directors** of these companies. This operation **prevents** each company from having to **lay off 10 000 employees** this year.

On a scale of 1 to 10 (1 being totally acceptable and 10 being totally unacceptable), what is your opinion about Aurelio's behaviour? (*Each answer should be between 0 and 10. Please provide your answer(s) here)

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- **Scenario B:** Aurélio decides to communicate the date of the operation to **two companies** that decide to buy a large amount of Dollars on the market, before the official announcement of this news and, consequently, **benefit** from the devaluation of the Real. He **has no links** to these companies. This operation **prevents** each company from having to **lay off 10 000 employees** this year.

On a scale of 1 to 10 (1 being totally acceptable and 10 being totally unacceptable), what is your opinion about Aurelio's behaviour? (*Each answer should be between 0 and 10. Please provide your answer(s) here)

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- **Scenario C:** Aurélio decides to communicate the date of the operation to **two companies** that decide to buy a large amount of Dollars on the market, before the official announcement of this news and, consequently, **benefit** from the devaluation of the Real. **He is on the board of directors** of these companies. This operation **prevents** each company from having to **lay off 50 employees** this year.

On a scale of 1 to 10 (1 being totally acceptable and 10 being totally unacceptable), what is your opinion about Aurelio's behaviour? (*Each answer should be between 0 and 10. Please provide your answer(s) here)

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- **Scenario D:** Aurélio decides to communicate the date of the operation to **two companies** that decide to buy a large amount of Dollars on the market, before the official announcement of this news and, consequently, **benefit** from the devaluation of the Real. He **has no links** to these companies. This operation **prevents** each company from having to **lay off 50 employees** this year.

On a scale of 1 to 10 (1 being totally acceptable and 10 being totally unacceptable), what is your opinion about Aurelio's behaviour? (*Each answer should be between 0 and 10. Please provide your answer(s) here)

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- **Scenario E:** Aurélio decides **not to communicate** an exact date to two companies, but to say that there is a high probability for the devaluation of the Real. These companies favour from buying dollars before the official communication. **He is on the board of directors** of these companies. This operation **prevents** each company from having to **lay off 50 employees** this year.

On a scale of 1 to 10 (1 being totally acceptable and 10 being totally unacceptable), what is your opinion about Aurelio's behaviour? (*Each answer should be between 0 and 10. Please provide your answer(s) here)

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- **Scenario F:** Aurélio decides **not to communicate** an exact date to two companies, but to say that there is a high probability for the devaluation of the Real. These companies favour from buying dollars before the official communication. **He is on the board of directors** of these companies. This operation **prevents** each company from having to **lay off 10.000 employees** this year.

On a scale of 1 to 10 (1 being totally acceptable and 10 being totally unacceptable), what is your opinion about Aurelio's behaviour? (*Each answer should be between 0 and 10. Please provide your answer(s) here)

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- **Scenario G:** Aurélio decides **not to communicate** an exact date to two companies, but to say that there is a high probability for the devaluation of the Real. These companies favour from buying dollars before the official communication. He **has no links** to these companies. This operation **prevents** each company from having to **lay off 50 employees** this year.

On a scale of 1 to 10 (1 being totally acceptable and 10 being totally unacceptable), what is your opinion about Aurelio's behaviour? (*Each answer should be between 0 and 10. Please provide your answer(s) here)

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- **Scenario H:** Aurélio decides **not to communicate** an exact date to two companies, but to say that there is a high probability for the devaluation of the Real. These companies favour from buying dollars before the official communication. He **has no links** to these companies. This operation **prevents** each company from having to **lay off 10.000 employees** this year.

On a scale of 1 to 10 (1 being totally acceptable and 10 being totally unacceptable), what is your opinion about Aurelio's behaviour? (*Each answer should be between 0 and 10. Please provide your answer(s) here)

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Vignette 2: Last week, an employee was discovered carrying out a dishonest act. The climate within his/her work team is tense as this act has affected the unit's operations as well as the image (internal and external) of the team and the organisation.

- **Scenario A:** João Pedro, responsible for the team, decides to summon the employee, who committed the dishonest act, **to hear his/her version of the facts** and thus have an opinion about the future of the employee, either to send him/her to another sector or to call his/her attention and ask for disciplinary sanctions. It is important to highlight that the employee that has been discovered **has been a good colleague, constant and engaged** in the fulfilment of his/her duties.

On a scale of 1 to 10 (1 being totally acceptable and 10 being totally unacceptable) what is your opinion about the behaviour of the team leader? (*Each answer should be between 0 and 10. Please provide your answer(s) here)

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- **Scenario B:** João Pedro, responsible for the team, decides to summon the employee, who committed the dishonest act, **to hear his/her version of the facts** and thus have an opinion about the future of the employee, either to send him/her to another sector or to call his/her attention and ask for disciplinary sanctions. It is important to highlight that the employee that has been discovered **is not a constant employee in his/her** and **lacks commitment** to fulfil his/her duties.

On a scale of 1 to 10 (1 being totally acceptable and 10 being totally unacceptable) what is your opinion about the behaviour of the team leader? (*Each answer should be between 0 and 10. Please provide your answer(s) here)

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- **Scenario C:** João Pedro, responsible for the team, decides to summon the employee, who committed the dishonest act, **to inform him/her of the disciplinary consequences** of his/her mistake and send him/her to another sector, meanwhile the case is resolved. It is important to highlight that the employee that has been discovered **has been a good colleague, constant and engaged** in the fulfilment of his/her duties.

On a scale of 1 to 10 (1 being totally acceptable and 10 being totally unacceptable) what is your opinion about the behaviour of the team leader? (*Each answer should be between 0 and 10. Please provide your answer(s) here)

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- **Scenario D:** João Pedro, responsible for the team, decides to summon the employee, who committed the dishonest act, **to inform him/her of the disciplinary consequences** of his/her mistake and send him/her to another sector, meanwhile the case is resolved. It is important to highlight that the employee that has been discovered **is not a constant employee in his/her** and **lacks commitment** to fulfil his/her duties.

On a scale of 1 to 10 (1 being totally acceptable and 10 being totally unacceptable) what is your opinion about the behaviour of the team leader? (*Each answer should be between 0 and 10. Please provide your answer(s) here)

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- **Scenario E:** Maria Camila, responsible for the team, decides to summon the employee, who committed the dishonest act, **to hear his/her version of the facts** and thus have an opinion about the future of the employee, either to send him/her to another sector or to call his/her attention and ask for disciplinary sanctions. It is important to highlight that the employee that has been discovered **has been a good colleague, constant and engaged** in the fulfilment of his/her duties.

On a scale of 1 to 10 (1 being totally acceptable and 10 being totally unacceptable) what is your opinion about the behaviour of the team leader? (*Each answer should be between 0 and 10. Please provide your answer(s) here)

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- **Scenario F:** Maria Camila, responsible for the team, decides to summon the employee, who committed the dishonest act, **to hear his/her version of the facts** and thus have an opinion about the future of the employee, either to send him/her to another sector or to call his/her attention and ask for disciplinary sanctions. It is important to highlight that the employee that has been discovered **is not a constant employee in his/her** and **lacks commitment** to fulfil his/her duties.

On a scale of 1 to 10 (1 being totally acceptable and 10 being totally unacceptable) what is your opinion about the behaviour of the team leader? (*Each answer should be between 0 and 10. Please provide your answer(s) here)

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- **Scenario G:** Maria Camila, responsible for the team, decides to summon the employee, who committed the dishonest act, **to inform him/her of the disciplinary consequences** of his/her mistake and send him/her to another sector, meanwhile the case is resolved. It is important to highlight that the employee that has been discovered **has been a good colleague, constant and engaged** in the fulfilment of his/her duties.

On a scale of 1 to 10 (1 being totally acceptable and 10 being totally unacceptable) what is your opinion about the behaviour of the team leader? (*Each answer should be between 0 and 10. Please provide your answer(s) here)

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- **Scenario H:** Maria Camila, responsible for the team, decides to summon the employee, who committed the dishonest act, **to inform him/her of the disciplinary consequences** of his/her mistake and send him/her to another sector, meanwhile the case is resolved. It is important to highlight that the employee that has been discovered **is not a constant employee in his/her** and **lacks commitment** to fulfil his/her duties.

On a scale of 1 to 10 (1 being totally acceptable and 10 being totally unacceptable) what is your opinion about the behaviour of the team leader? (*Each answer should be between 0 and 10. Please provide your answer(s) here)

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Module E. Characteristics

1. What is your gender? (*Please choose one of the following options)

- Female
- Male

2. How old are you? (*Only numbers can be used in this field. Please enter your answer here)

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3. What is your state/federal district of residence? (*Please choose one of the following options)

- Acre
- Alagoas
- Amapá
- Amazonas
- Bahia
- Ceará
- Goiás
- Goiás
- Maranhão
- Mato Grosso
- Mato Grosso do Sul
- Mato Grosso do Sul
- Pará
- Paraíba
- Paraná
- Pernambuco
- Piauí
- Rio de Janeiro
- Rio Grande do Norte
- Rio Grande do Sul
- Rondônia
- Roraima

- South Africa
- Saskatchewan
- Sergipe
- Tocantins
- Federal District

4. What is your level of education? (*Please choose one of the following answers. Please choose only one of the following options)

- High school
- Higher technical course (2 to 3 years)
- University course (4 years)
- Post-graduate or specialisation
- Master's degree
- Doctorate
- Other

Note

¹ By Decree No 11.529 of 16 May 2023, the SIPEF was replaced by the System of Integrity, Transparency and Access to Information of the Federal Public Administration of Brazil (*Sistema de Integridade, Transparência e Acesso à Informação da Administração Pública Federal* – SITAI). This new system is expected to maintain the strengths of the SIPEF while also further strengthening integrity, broadening its scope and bringing it closer to themes such as transparency and access to information.

OECD Public Governance Reviews

Strengthening Integrity Leadership in Brazil's Federal Public Administration

APPLYING BEHAVIOURAL INSIGHTS FOR PUBLIC INTEGRITY

The behaviours of both top- and middle-level managers matter for promoting open organisational cultures, mitigating integrity risks and fostering ethical behaviour by their staff. This report examines key issues around integrity leadership in Brazil's federal public administration, based on an extensive survey of senior public officials. Informed and inspired by behavioural insights, it provides concrete recommendations for strengthening integrity leadership in Brazil.



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