Integrity Systems: Conceiving, Describing, Assessing

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Introduction

In countless respects, the security, wellbeing and quality-of-life of all Australians depends on powers they entrust to others. Political decision-making hinges not just on the objective 'quality' of those we empower as leaders, but their ability to earn and retain our trust. The policymaking and services of executive government reach into every aspect of our lives, but their effectiveness is dependent on policy that is responsible, as well as responsive. Commercial life, our health and safety as consumers, and the economic conditions under which we live and work rely on business officeholders honouring diverse obligations to investors, customers and society at large. Not just in a fuzzy, abstract sense but a myriad of formal ways, trust makes our world go round.

How we do know these interlocking matrices of trust relationships – political, administrative, financial, personal – are intact, healthy and being honoured? In a complex world, how do we know entrusted power is being used in accordance with the purposes and values for which it was entrusted? This paper introduces the emerging results of a five-year research project[1] seeking to answer these questions by mapping and assessing Australia's 'national integrity systems' – the sum total of institutions, processes and people dedicated to ensuring accountability and inhibiting corruption in our society.

The term 'national integrity system' (NIS) was popularised internationally in the 1990s by Jeremy Pope, foundation managing director of Transparency International, based on two experiences: the post-Fitzgerald Electoral and Administrative Review Commission (EARC) reform process in Queensland, Australia in 1989-1994 (albeit a provincial rather than national process: Pope 2003: 5); and a National Integrity Workshop in Tanzania in 1995 (Sedigh & Muganda 1999: 171; Pope 2000: 36; 2003: 10). Since its articulation in the Transparency International 'Sourcebooks' of 1997 and 2000 (Pope 2000), the concept has been used as a basis for qualitatively assessing the integrity infrastructure of 33 countries using a methodology developed by Professor Alan Doig, with another 22 in progress (TI 2001; Doig & McIvor 2003a; 2003b; Larmour & Barcham 2004). In-progress studies include a separate report on Australia's federal-level integrity systems conducted by one of our own research team (Roberts forthcoming).
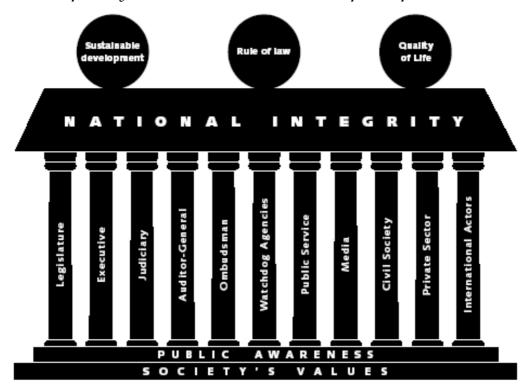

Figure 1. Transparency International's NIS Greek Temple (Pope 2000: 35):

The 'NIS' concept reflects a commonality of experience between different countries – industrialising, industrialised, post-colonial and decolonised – in which accountability and corruption control rely on a diversity of efforts. No single reform is promoted as a lone key to enhanced integrity, but rather a mix of interreliant reforms. The dominant metaphor articulated by Pope is that of a Greek temple, combining all the institutional 'pillars' involved in the anti-corruption fight in a wide range of countries (Figure 1). At least in theory, the specific number and names of the pillars are not prescribed, as emphasised by a recent suite of Pacific Island studies (Larmour & Barcham 2004: 5). The pillars are also not solely institutional, with the TI Sourcebook emphasising accompanying 'rules and practices pillars' by which key integrity values are operationalised. The main lesson is that no single law or institution is likely to provide a magic bullet against corruption. Rather multiple institutions and reforms are needed to achieve and support a desired integrity 'balance', the value of the whole being greater than the mere sum of the parts.

The aims of the Australian National Integrity System Assessment (NISA) project are twofold: *(1)* to better map the institutions and inter-institutional dynamics of Australia's integrity systems, as a major component of *(2)* a comprehensive methodology for assessing those systems' health, well-being and capacity for improvement. To assess any such system, the existing matrix of institutions, rules and practices for the given society needs to be identified, analysed for strengths, gaps or weaknesses, and made subject to recommendations for improvement. Superficially it might seem self-evident why such assessment is good – but in practice, meaningful analysis is conceptually and methodologically complex. The present project began with no fixed methodology, rather was intended to produce one along the way. Hence this paper addresses two fundamental background questions. What objectives is this assessment trying to serve? And given those

objectives, and the lessons already thrown up by similar and related efforts, how should the assessment methodology be structured?

The paper has four parts, addressing the four main objectives associated with the NIS and related methodologies. Importantly, the NIS effort is not alone in the world of 'good governance' assessment and reform. A global industry in integrity systems assessments now exists that few would have contemplated 15 years ago, including those of the World Bank, Organisation for Economic Cooperation and Development (OECD), and Washington-based Centre for Public Integrity (CPI). The latter's Global Integrity Report also includes an existing Australian assessment conducted by one of our team,[2] providing another direct point of comparison between methodologies. Examining this background, we find four different starting-points – economic, democratic, administrative, and personal – enabling us to decide whether we are assessing integrity systems in order to:

(a)   pursue greater, i.e. liberalised and deregulated, economic development;
(b)   promote and enhance democracy;
(c)   establish whether existing 'ethics infrastructure' is performing cost-effectively, irrespective of political or economic change; or
(d)   promote 'integrity' as a desirable personal quality, at a time when it seems in reduced supply.

By contrasting these interrelated objectives, we clarify the present Australian assessment as a clear mix of *(b)* and *(c)*, with the need for a strong awareness of *(d)*, and very little to do with *(a)* despite its dominance of much international governance reform. Moreover this review emphasises that even with clear objectives, further caveats need to surround the potential replication of the Australian methodology in other political and economic contexts, given the inherent subjectivity of such a task even within Australia.

In the course of this analysis, we also identify eight practical limitations associated with existing assessments, important to the design of a suitable methodology. For example, the CPI Global Integrity Report (Camerer 2004) admits four limitations in its analysis of 25 countries: inadequate attention to private sector accountability; overemphasis on formal institutions; problems of geographic superficiality; and contests over the value and quality of different types of evidence. These lessons, combined with clearer objectives, help provide the basis for new methodological choices. In conclusion, having provided some clear conception of what integrity systems are, we outline a new assessment framework for this project's two main activities:

1.   *Describing.* We aim to show that the method used for describing existing integrity systems – good, bad or indifferent – is just as important as how one assesses them, because without a truly three-dimensional view, no prescriptions for reform are likely to have much value. In particular, the description should not commence with a template of desired institutions in mind, but rather a full description of what exists. We identify three different approaches to this descriptive task – ***structural***,

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[2]   John Uhr was lead social scientist for Australia in the Global Integrity Report. See Camerer (2004), http://www.publicintegrity.org (viewed 10 June 2004).

spatial-systemic and *anthropological-ecological* – any combination of which might be needed to 'map' the existing integrity system in a given context.

2.   *Assessing.* Clearly integrity system assessments need to escape from a 'laundry list' of preferred institutions as the primary means of analysing what might be right or wrong about a system. While inherited and imported institutions remain integral, they represent an inadequate primary focus and don't themselves supply an evaluative method. Accordingly we propose a framework that seeks to assess the *capacity* of existing systems, more holistically conceived; evaluate their *coherence*; and measure their performance or *consequences*; before recommending reform. Further papers in the series will explore in more detail what this involves, and present conclusions.

Integrity and Economic Development

Objective (a): globalised economic liberalism

In what context, and for what purposes, did the idea of the National Integrity System first emerge? While Queensland reforms helped inspire its conceptualisation, the pioneer National Integrity Workshop was held in Tanzania in 1995. It was cosponsored by Transparency International and the World Bank, as were a suite of further African workshops. The founding chair of Transparency International, Peter Eigen, was previously manager of World Bank programs in Africa and Latin America. The funders for TI-sponsored NIS country studies have been European, British and Australian development assistance agencies. The NIS concept thus emerged and gained its greatest traction among the international anti-corruption campaign of the post-1990s – triggered in large part by the 'lifting of the veil' on corruption problems in aid-receiving countries, and reduced international business tolerance of the costs and uncertainties of foreign bribery (Glynn et al. 1997: 16-24; McCoy 2001: 68, n.16; Sajo 2003: 175). Governance evaluations such as implicit in the NIS model are closely associated with reducing the aid lost to corruption in developing countries, and bolstering institutions that – at least in donor eyes – should help those communities manage their economic affairs more efficiently, accountably, profitably and equitably.

    National Integrity Systems assessments that begin with these goals, however, come with two presumptions. First, the bulk of recommended reforms are less culturally variable than might have been expected. They include a "state of the art" prescription of macroeconomic reform based on reduced public sectors, minimised official discretion, deregulation, privatisation, enhanced competition and market liberalisation: "virtually all economic, deregulation, and government reform measures would not only help curb corruption but also help sustain national growth strategies" (Kaufmann 1999: 95). Ultimately, as Williams (1999: 122) comments, a "very specific, Western-based understanding of market discipline" underlies this anti-corruption response. This fact is emphasised by recent directions in World Bank assessments. For example Governance Indicators developed to help measure progress against the Bank's Millenium Development Goals use six dimensions: voice and accountability, political stability, government effectiveness, regulatory quality,

rule of law, and control of corruption (Kaufmann et al. 2003). However the apparent comprehensiveness of this list can obscure a narrowness in practice. The 'rule of law' issue consistently identified as most important is enforceability of contracts and private property rights (Stapenhurst & Kpundeh 1999: 238; Kaufmann et al. 2003: 4, 19, 85, 96 etc; Knack et al. 2003: 360). Clearly this is because these are more directly fundamental to market economics than, for example, freedom from arbitrary torture.

The second presumption is that enhanced integrity is not an end in itself, but rather a means to an end – 'good governance' is a means to development, sometimes characterised in terms of 'sustainable' economic development (as in Figure 1) but often still in terms of "greater economic development" or "growth" (Pope 1999; Johnston in Johnston & Doig 1999: 20). Since at least 1992, for example, the World Bank has defined governance as "the manner in which power is exercised in the management of a country's economic and social resources *for development*" (see Marquette 2001: 399). This is not the place to rehearse the difficulties faced by Western, international and development economics in divining sustainability transition paths, or even competent measures of progress towards 'triple bottom line' social, environmental and economic outcomes. It is enough to note that the meaning and value of economic development goals can be contestable, even if we accept that integrity is merely a means to those ends.

Economic liberalisation goals are relevant to Australian integrity systems because, of the four starting-points reviewed in this paper, they identify what the Australian assessment is *least* about. Even internationally, there is now a recognised tension between the relative absolutism of such creeds and the integrity challenges faced by a range of countries. The TI concept in Figure 1 balances 'quality of life' and 'the rule of law' as equal goals to 'sustainable development'. The first 18 NIS country studies auspiced by TI produced signs that contrary to original presumptions, economic deregulation did not necessarily serve as an automatic support nor ultimate goal for integrity-based reform (TI 2001: 11-12, 26-7; Doig & McIvor 2003a: 326). In Australia – with its long history of a strong and proactive public sector – the policy tide is cycling away from neo-classical economics and dry forms of new public management as a fount of governance values (Brown 2003b; Uhr 1999: 97). This is notwithstanding historical links between the rise of that tide from the late 1980s-mid-1990s, for example in the microeconomic reforms of the NSW and Queensland governments, and simultaneous introduction of strong anti-corruption bodies: the Independent Commission Against Corruption and Criminal Justice Commission (now Crime & Misconduct Commission). The gloss faded on Premier Nick Greiner's promise to manage NSW like a corporate group (NSW Inc) after his forced resignation in 1992, having tried to appoint an ex-minister to a public service job in contravention of his own new public management legislation. Another state attempt at entrepreneurial government (WA Inc) collapsed with the premier's imprisonment for pocketing big business 'donations'. Since then, deregulation is also much less in vogue more generally.

The extent and benefits of Australian microeconomic reform in the 1980s-1990s can be weighed elsewhere, and its integrity impacts evaluated in the project conclusions. The critical issue here is that the goal of enhanced integrity does not necessarily include, let alone hinge upon, any prescribed formulae of economic deregulation of the kind with which the NIS was associated at its international 'birth'. Thus we need to find other reasons for undertaking the Australian

assessment, because economic liberalisation goals do not provide any special guide for why or how to assess our integrity systems. They do, however, emphasise the importance of bringing all powerful institutions into the assessment, including international business and commerce. These realisations are important for any effort to replicate the methodology internationally, particularly since Australia is a reported starting-point for the NIS concept.

Methodological issue (a): the non-government sectors

A first practical lesson from existing assessment approaches, is that direct inclusion of the private sector in societal integrity assessment is a relatively new development. There are some obvious explanations. A major feature of international policy debate, particularly in economics, has been the presumption that corruption is primarily a public sector problem – the abuse of public power for private gain. The conceptual separation of public and private power, interests and laws has a long history in Western political thought. 'Business integrity' and 'public integrity' have been conceived differently, with the former best left to self-regulation and the market, at least in first instance, whereas policing the behaviour of public officials has been the focus of the NIS approach.

However in recent decades, all these assumptions have changed, albeit often slowly. Corruption is also recognised as existing both within the private sector and between sectors. Transparency International has expanded its traditional 'official bribery' definition to include any self-serving abuse of entrusted power, equally applicable to all sectors (Pope 2000: 13; see also Stapenhurst & Sedigh 1999: 1). In Australia, corporate excesses since the 1980s entrench this wider focus. Public law and private law principles and approaches to accountability have been cross-fertilising, rather than a one-way 'privatisation' or 'publicisation' (Sampford 1991; Whincop & Keyes 1997; Mulgan 2003: 228-9). Business integrity is recognised as more than market-based, also entailing more diffuse 'public-style' responsibilities to employees, consumers and society-at-large. So too is governance in the 'third' or civil society sector (Uhr 2003: 33).

The need for assessment methodologies to bring together and compare these 'private' and 'public' integrity systems, and understand their interrelationships, is increasingly recognised. Unfortunately economics-based governance assessments still tend to adopt a 'public integrity' model, monitoring effectiveness of control over governments and public officials more than over business itself. For example, of the several hundred variables from 25 surveys used as World Bank Governance Indicators, just four detect corruption within business (not including organised crime): two surveys each ask about insider trading and tax evasion (Kaufmann et al. 2003: 78, 85). However the CPI's Global Integrity Report, while explicitly focused on the 'public integrity' issues implicit in citizen control of the state, accepted feedback from many of its 153 researchers that lack of private sector indicators was a definite weakness (Camerer 2004). The TI NIS concept is one step ahead, in that the private sector was identified from the outset as an integrity 'pillar' – but unfortunately the meaning of this has been unclear. Originally it appears to have only recognised the role of some (presumably not all) international business in deciding to fight rather than perpetuate bribery (Stapenhurst & Sedigh 1999: 2). Pope and World Bank coauthors recognise improved ethical behaviour by companies as fundamental in an

NIS, but customarily in voluntary or self-regulatory terms, the primary sanction for unethical behaviour being expulsion from professional associations – not regulation or prosecution (Langseth et al. 1999: 145; Pope 2000: 137-151). The TI Sourcebook recognises, of course, that business involvement in corruption is illegal, but until now business regulatory institutions have not been recognised as 'integrity pillars'.

The present Australian project has begun to directly tackle this problem. One of its earlier components, a Business Integrity Systems Assessment (BISA) conducted by the RMIT School of Management, followed the preexisting NIS template by focusing on systems developed voluntarily by businesses at an organisational level – but confirms that in reality, individual and societal integrity systems are equally important. The forgotten societal 'pillars' of Australia's business integrity systems include public policy and legislation; legal systems maintenance; regulatory review; and corporate monitoring and reporting; as well as professional regulation (Kimber et al. 2001: 70). Indeed, however uncomfortably this may sit with the deregulatory emphasis of many economics-based assessments, the BISA study confirmed that current public responses to perceived "abuse of power and influence" under self-regulation include a preference for "stricter regulatory regimes, more law and order, [and] more education and training in the importance of human values" (Kimber et al. 2001: 29-30). Thus the tasks of further mapping and assessing these elements of Australia's national integrity system remain a crucial departure-point for further work in our project. Figure 2 provides just a starting point:

Figure 2. Regulatory Relationships in the NIS (Brown 2003a)

Objective (b): the development of representative democracy

A related rationale for assessing Australia's integrity systems – and more satisfactory one – is the potential contribution this may make toward the enhancement of our society's systems of democratic accountability. This starting-point is just as central to economic motivations in the international anti-corruption language of the Transparency International NIS concept. Along with increased productivity and general 'modernisation', international agencies widely promote democratisation as the key to reducing corruption "in the long run" (Elliott 1997: 176), with the spread of democracy presumed to "afford less fertile ground in which corruption can flourish"

(Stapenhurst & Sedigh 1999: 2). Of course this depends on the type of corruption under discussion. More accurately, the presumption is that the forms and prevalence of corruption in developed, democratic societies – while still problematic – are generally less bad than those in less developed, undemocratic ones (Lipset & Lenz 2000: 122; Pope 2000: 1; Hindess 2004: 4). In any event, the wisdom underpinning the NIS is that the preferred integrity system is correlative with democratic institutions – and not just democracy as might be self-defined, for example by communal, direct or religious democracy, but democracy on a Euro-American liberal representative model. For example the TI Sourcebook Foreword by Oscar Arias Sánchez, former President of Costa Rica, reinforces the merits of democratization with special reference to Europe's "age of Enlightenment" —

> … of great philosophical debates about the merits of democracy, the constitution of liberty, and the obligations of citizenry. Let us see the dawn of a new and global enlightenment. Let us work for a renaissance of the ideas that gave birth to our democracies and shaped our governments, for our futures will only be secure by a sustained commitment to these same ideals (Pope 2000: xiii).

Consistently with this starting-point, the NIS concept acknowledges "variations around the world" but conveys no doubt that "the most usual 'integrity pillars' of a society which is seeking to govern itself in an accountable fashion" are the familiar institutions of representative democracy listed in Figure 1 (Pope 2000: 36; see also TI 2001: 8, 40-1 cf 25; Doig & McIvor 2003b). They begin with the tripartite state institutions of Executive, Parliament and Judiciary, formalised in Britain, theorised by France's Baron de Montesquieu and constitutionalised in America during that European 'enlightenment'. Indeed the whole concept of 'horizontal accountability' in which new pillars are presented as equally fundamental, all cross-checking the power of the others, takes as its modern starting point the Anglo-American 'separation of powers' (see Schedler et al 1999: 29-67; Uhr 2003: 16; Brown 1992). While the list of institutions and laws studied through the NIS prism have indeed varied, they remain based in and essentially correlative with democratic institutions spread from this Western model.

This indirect presumption of representative democracy in the NIS can be contrasted with three other approaches. The World Bank's first Governance Indicator of 'voice and accountability', mentioned above, is broader than representative democracy, at least conceptually (in practice its data on political participation is overwhelmingly democratically-centred: Kaufmann et al. 2003). On the other hand, the CPI Public Integrity Report explicitly targets 25 countries "that hold elections", making it fairly unremarkable why it would equate integrity with effective democracy and use six similar institutional categories to the NIS (Figure 3). The third approach is the Democratic Audit developed by the Stockholm International Institute for Democracy and Electoral Assistance (IDEA), another method currently at work in Australia,[3] whose fourteen 'pillars' of nationhood and identity, rule of law and access to justice, free and fair elections, and so on, are also explicitly about effective representative democracy.

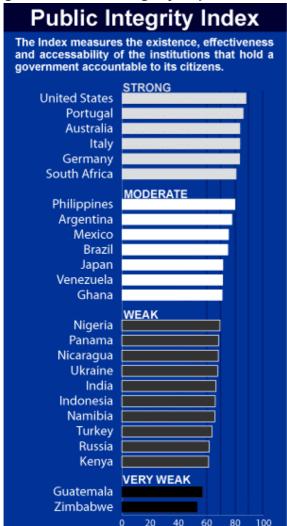[3]   See http:\\www.idea.int. Comparative political science has long contained many such methodologies.

Figure 3. Global Integrity Report (Camerer 2004)

Global Integrity Report – Indicator Categories	Australian Rating
Civil Society, Public Information and Media	4th – Very Strong
Electoral and Political Processes	8th – Strong
Branches of Government	8th – Moderate
Administration and Civil Service	8th – Weak
Oversight and Regulatory Mechanisms	3rd – Very Strong
Anti-Corruption Infrastructure and Rule of Law	1st – Very Strong

The objective of an enhanced representative democracy is clearly applicable to a national integrity system assessment of Australia – given it is already our dominant tradition. Despite many millennia of pre-European Indigenous governance, our dominant political institutions were constructed out of emerging Anglo-American democratic systems, and our majority British population then pushed their boundaries before entrenching them in our 1901 Constitution. Indeed given that Australian reforms helped inspire the NIS concept, it seems no accident that it would feature democratic institutions so prominently. If we examine the Public Integrity Index (Figure 3), it seems similarly unsurprising that we would rank fairly well. Indeed the political institutions of all five countries ranking as 'strong' on the Index have lengthy historical and cultural groundings in Western European democracy, to an extent quite differentiable from the remaining twenty.

The major caveat regarding the pro-democratic objective of integrity systems assessment, therefore, relates less to Australia than the assumption that 'integrity' in any and all countries can automatically be promoted through this template. Despite claiming to recognise the uniqueness of different cultures, political systems and development paths, the NIS "proposed as a set of objectives… elements… and

pillars" (Doig & McIvor 2003a) is clearly more than a mere anti-corruption strategy, but a normative model of an entire political system (Hindess 2004). Many social progressives in non-European countries clearly have no problem with this, if like Sánchez they are already convinced of the value of stronger representative democracy. Syed Hussein Alatas professes a similar need for an Asian popular-political transformation comparable with European democratisation (Alatas 1999: 127-132). However there are problems with assessment methodologies that already presume the fundamental answer – to governance generally or integrity in particular – and risk becoming "reform proposals that emphasise the same factors everywhere, and thus do not really fit anywhere" (Johnson in Quah 2003: 244; Lindsey & Dick 2002: v-vi; Jayasuriya 2002).

The proponents of the NIS may not have intended a uniform prescription, but it has that quality, since while it is *theoretically* possible to identify new 'pillars', the concept so far provides little assistance in doing so. NIS studies provide a rich description of anti-corruption responses drawn up by in-country researchers and useful to TI's country chapters, but do not seem to throw up innovative solutions. Indeed TI professed satisfaction when the first 18 NIS country studies appeared to prove "the relevance and application of a uniform approach" by revealing "most countries had nearly all the pillars and few had additional or different pillars" (TI 2001: 39). The problem appears to be that the pillars are there, but sometimes only as facades, or "hollow" (Larmour & Barcham 2004: 29; TI 2001: 16, 27). This begs many questions, including *(a)* where these societies' real old and new founts of integrity lie, given their different social evolutions, and *(b)* to what extent some pillars were already hollow before they left Western shores, for example those associated with electoral integrity (Philp 2001; Doig & McIvor 2003a: 325). There is plenty of empirical evidence that even Westerners like the *principles* of democracy more than they think it actually works (Cowling 2004: 19), confirming the mismatch between the formal notions of democracy on which institutional integrity models often rely and "the reality of democratic life" (Dobel 1999: 10).

There are two lessons from this. First, an assessment of Australia's national integrity system is of an established representative democracy based on distinct political, cultural and economic conditions. Its lessons may be transferable to no-one; rather, at best, the methodological process might assist others in devising their own assessment processes, working from first principles, and needs to be designed with this in mind. Second, in using the NIS concept to assess Australian institutions we are effectively only holding up a mirror to ourselves. How do we cease evaluating ourselves in terms of institutions we already have, and instead against the type of democracy we want to be?

Methodological issue (b): the institutional focus

The focus on laws and institutions implicit in these democratic assessments raises three practical problems. The first is geographic superficiality – how to assess democracy at every spatial level at which it is configured. The existing NIS studies and CPI methodology do not necessarily extend beyond national-level government. Even between democracies with otherwise common systems, e.g. three-tiered federations of ex-British colonies, the implications can be huge: in Malaysia, more than 80% of public resources are expended from the national level, but in Australia it

is around 50% and in Canada only 40% (Brown 2002: 27-28). Consequently a national-level focus will catch more of Malaysia's integrity system in practice. The problem is driven home by the Australian Government's various self-assessments for the OECD and/or Asian Development Bank, which omit vast components of the nation's integrity systems (OECD 2000: 82-96; Australian Government 2004). Any country seeking to emulate the latter would probably collapse. Our project has only begun to remedy this with state-level integrity system assessments for Queensland and New South Wales (including local government), as well as the Commonwealth, followed by exploratory comparisons between all governments. A comprehensive method will have to integrate the lessons from all nine 'public integrity systems' and marry these with 'business integrity systems' that operate at one national scale for most regulatory purposes but also other state and regional ones. An efficient, accurate, overall picture is an ongoing challenge.

The second problem is that so far, the focus on institutions has still not told us much about the interrelationships that make up an effective integrity system – whether between these institutions or other elements. The original promise of the NIS concept was to provide a "new form of diagnosis" for understanding the "inter-relationships, inter-dependence and combined effectiveness [of integrity measures] in an holistic approach… instead of looking at separate institutions…and then focusing on stand-alone reform programmes" (Pope 2000: 37). Yet once assessment begins, so much time can be spent in reductionist examination of the system's elements, checking off individual institutions and laws, that the 'mapping' objective is lost. The second question becomes how to short-cut the purely institutional analysis in order to take advantage of the holism of the original concept.

Third, and most important, is the question already asked: if we are lucky enough to be measuring our integrity systems against their own institutional image, how do we identify any actual problems? The first part of the answer is supplied by the simple technique underpinning the existing NIS and CPI methodologies, which compare the 'formal provisions' or *de jure* framework of institutions and practices, and *de facto* reality or 'what actually happens.' This simple contrast becomes valid because of its consistency with the basic precept of accountability in a liberal democracy, that the relation between what we say and do actually matters. We measure the exercise of entrusted power against the express or implied purposes for which it was entrusted. As discussed in the Queensland phase, our most tangible concept of 'integrity' relates closely to this concept of accountability, as well as being the positive opposite to negative corruption (Preston 2001; see also Dobel 1999: x). This simple comparison has limits, however, because it only helps identify when we have sought to do something, but not achieved it. This is valid, and the mere act of inquiry may throw up new options, but the comparison does not itself tell us if what we originally tried to do was wrong. We might implement imported integrity institutions exactly as promised, but our standards might changed and require new institutions, or the original model might have never been appropriate to our values. Australians ought to recognise this risk because they have a history as great political 'bower birds', borrowing laws and institutions from multiple contexts but often without much inquiry into their actual theory or original operation – a "click go the shears" approach to institutional design (Williams 1999). Even within Australia, let alone between countries, problems of legal and institutional transfer are ongoing.

This third problem is answered by lifting the focus from the institutions that dominate the NIS to other recognised dimensions of integrity in Western society. These dimensions are present in the NIS concept, but buried. The integrity 'pillars' are recognised as standing on a foundation that includes 'society's values', but the pillars so dominate the latter that they seem to be squashing them (Figure 1). Similarly integrity is recognised as also dependent on 'rules and practices pillars' – the operational methods that give institutions their life – but these are not depicted in Figure 1 and remain legalistically described. This is consistent with the desires of most lawyers and many economists to codify human behaviour, hoping corruption opportunities will be limited if "areas of discretion" are "minimised or, where possible, eliminated" (Pope 1999: 99; Stapenhurst & Sedigh 1999: 5; Langseth et al. 1999: 129). Unfortunately total elimination of human discretion is unrealistic, just as it is undesirable if we are also encouraging officeholders to be entrepreneurial and imaginative. In the West there is a well-known problem with integrity regulations that "trade-in ethics in favour of law", trying to regulate something "difficult even to define, much less to spot" (Carter 1996: 194).

A more comprehensive assessment might thus begin with a rebalancing of the elements of the NIS concept, giving equal weight to the three dimensions of integrity commonly found in Western legal, political, management and ethics thought, as tracked by Sampford (1992; 1994), the OECD [, 1996 #45; , 1999 #15: 12; , 2000 #180: 23], and Dobel (1999: 2-22), and consistent with the trinity of societal, organisational and individual integrity described by Kimber et al (2001). We combine these in Figure 4. How our methodology might better balance what Dobel calls the '*legal-institutional*' model with '*effectiveness* or *implementation*' and '*personal-responsibility*' models can be reviewed after further considering these in the next two sections.

Figure 4. Integrity Dimensions/Models in Western Political Thought

Integrity and Administrative Performance

Objective (c): administrative performance measurement

The third approach to integrity system assessment focuses on one of the major subsets of integrity described in the last section – on assessing not the structures, but methods of governance. It centres less on which institutions exist, nor directly on their interactions, and consequently less on whether a given system is in need of major political or economic change. Rather the focus is on how institutions *perform*, and whether they are discharging their agreed purposes and responsibilities; if the answer is yes, the 'effectiveness' or 'implementation' model says integrity has been achieved. Integrity systems assessment thus becomes a more administrative exercise, concerned with the effectiveness of ethics programs whose legitimacy is uncontested – at least in theory. This approach is akin to concepts of audit and evaluation in the administrative sciences, and was the thrust of the more limited approach taken to the Queensland pilot phase of the project.

The clearest international example of this approach, alongside the simple comparative technique embedded in NIS studies and the CPI methodology to date, is the OECD search for a framework for "assessing effectiveness in ethics management" (OECD 2000: 69-72), driving the current OECD project on 'Developing Policy Assessment Measures for Integrity and Corruption Prevention Activities in the Public Sector' to which the Australian NISA project is also contributing. However the OECD's own surveying of its 29 member countries already provides a strong overall assessment framework, not unlike the NIS concept, describing an 'Ethics Infrastructure' which combines something of all three integrity dimensions discussed above in the form of "guidance", "management" and "control" [OECD, 1996 #45;

1999 #15: 12; , 2000 #180: 23]. Moreover like the NIS, much of the value of the eight elements of this infrastructure lies in the fact they work in a "complementary and mutually reinforcing fashion":

1. Political commitment [to ethical behaviour in administration]
2. Workable codes of conduct
3. Professional socialisation mechanisms
4. Ethics coordinating body
5. Supportive public service conditions
6. Effective legal framework
7. Efficient accountability mechanisms; and
8. Active civil society (OECD 2000: 24-5).

Another, related OECD survey of 15 countries also identified 12 different anti-corruption mechanisms consistent with this framework, and highly correlative with the NIS 'pillars', including enforceable anti-corruption laws, oversight by legislature or parliament, bodies with power to investigate corruption, supreme financial audit authority, an ombudsman, specialised bodies to prosecute corruption, human resources and financial management controls, and guidance and training for public officials (OECD 1999: 7-8).

While closely overlapping with the NIS concept, the OECD catalogue is explicitly limited to the public sector, and less explicitly focuses on public administration – those systems designed to ensure the accountability of primarily non-elected officials in carrying out the business of government. Indeed the OECD's introductory definition of integrity is, in many respects, simply a succinct restatement of good public administration:

Ensuring integrity means that:

- Public servants' behaviour is in line with the public purposes of the organisation within which they work.
- Daily public service operations for business are reliable.
- Citizens receive impartial treatment on the basis of legality and justice.
- Public resources are effectively, efficiently and properly used.
- Decision-making procedures are transparent to the public, and measures are in place to permit public scrutiny and redress (OECD 2000: 11).

This approach to the definition of integrity and assessment of systems is clearly also applicable to Australia. So will the OECD framework when finalised, not least because Australia will have contributed to it. The performance assessment approach is consistent with current styles of 'values-based governance' in the public sector, seeking structured but dynamic ways of evaluating performance against the fundamental goals or 'first principles' of organisations and programs. Indeed as shown in Figure 5, this approach has produced its own graphic NIS-style metaphor for organisational good governance, not a temple but a house (Barrett 2004). As Figure 6 shows, conceptual maps of these kinds of accountability systems have existed in Australia since before the recent outbreak of international activity (Thynne & Goldring 1987: 11). However it is also clear this approach is focused on how integrity systems *work*, taking them as something of a given, rather than what needs

to be in them or how they should be developed. This is an important but less ambitious focus, raising different methodological issues.

Figure 5. 'The House of Public Sector Governance' (ANAO, Better Practice Guide on Public Sector Governance 2003, adapted from Qld Department of Transport 2001, see Barrett 2004).
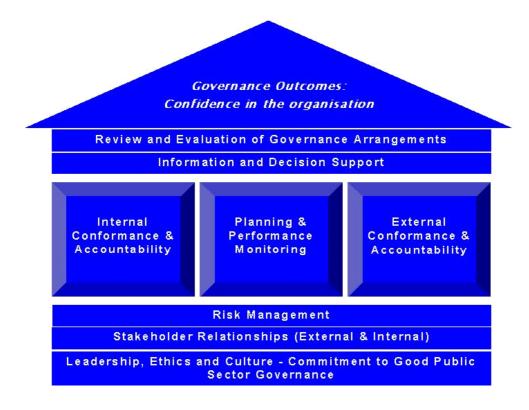
Figure 6. Accountability Infrastructure for Federal Officials (Thynne & Goldring 1987: 11)

	Formal	Informal
Internal	Ministers and administrative superiors	Peers and subordinates
	Public Service Board, Treasury, Department of Finance, Department of the Prime Minister and Cabinet, and Auditor-General	Conscience, loyalty, personal values and ethics
		Professionalism
	Associated departments (especially in the case of non-departmental officials)	Anticipated expectations and reactions of Ministers, administrative superiors, peers and subordinates
	Ombudsman and administrative tribunals	
	Requirements to provide statements of reasons for decisions	
	Conventions and codes of conduct	
External	Parliament and parliamentary committees	General public
		Political parties and party committees
	Cabinet and cabinet committees	Politicians and officials at other levels of government
	Courts	
	Enabling legislation	Interest groups and their representatives
	Freedom of Information legislation	Mass media and media representatives

Note: cf Kernaghan's fourfold classification of internal and external controls and influences over officials and their decision-making: Kenneth Kernaghan, "Responsible Public Bureaucracy: a Rationale and a Framework for Analysis" (1973) 16 *Canadian Public Administration* 581-586. Also cf Peters' internal-external (or policy-survival) and formal-informal (or formality) schema for distinguishing "several basic dimensions of the political activity of administrators": B Guy Peters, *The Politics of Bureaucracy*, New York, Longman, 1978, pp. 138-141.

Methodological issue (c): quantitative audit or qualitative evaluation?

Two fundamental methodological issues are raised by the performance assessment approach. The first is that it automatically shies away from the more political implications of reform, and even more than the institutional approach tends not to look beyond existing institutions nor question existing standards absent some overwhelming reason to do so. This is not to say the results are useless, as the Queensland pilot phase testified. The considerable effort spent trying to evaluate, rather imprecisely, what public integrity bodies do, ultimately made it possible to begin 'mapping' their operational interrelationships, in the end mainly by cajoling some into a survey about what they really thought of each other (KCELJAG & TI 2001: 102-4). A focus group of nine central integrity agency representatives also

identified eight 'emerging issues' (or problems) confronting the system, six of which related partly or wholly to operational coherence (KCELJAG & TI 2001: 108-119). These lessons informed the design of instruments used in the NSW and Commonwealth studies.

Nevertheless this was very much an internal, bureaucratic view, and did not supply many measures of the performance of the system in delivering higher integrity among public servants, containing or preventing corruption, or bringing about greater accountability. Administrative systems had 'integrity' in that they were functioning much as intended, subject to the identified problems; but whether solving those problems would have much effect on substantive public integrity levels was difficult to tell, as against solving other problems not identified. The limitations were highlighted by the fact that even as the report was being finalised, at least three significant Queensland integrity system 'weaknesses' were emerging which the pilot project did not identify.[4] These were not oversights but rather methodological limits of the approach. The OECD is responding to a similar problem, not unrelated to the common problem of over-dependency on self-reporting and self-assessment (Uhr 1999). National governments have remained vague on how they assess effectiveness, frequently citing normal human resource management systems, with measures of success generally restating the intent of original reforms (OECD 2000: 69-72). National reports on processes to 'coordinate and manage' the integrity system, reveal only 16 of the 29 OECD countries reporting *any* coordinating institution, only three reporting a central office to oversee ethics-related measures, and the most tangible sign of performance evaluation, reported by 12 countries, is reactive (analysis of "systemic failures and trends in criminal and disciplinary cases", i.e. measuring when things still go wrong: OECD 2000: 66-68).

The second, related problem is what types of evidence should count in measuring the effectiveness of a system – whether in the above administrative performance sense, or the broader institutional reviews pursued through the NIS and CPI studies. Here integrity system assessments descend into disarray, not assisted by our own Queensland pilot. For example, the Centre for Public Integrity prides its Global Integrity Report as a "quantitative assessment of governance issues", but this can be misleading, because its 25 studies are all qualitative, based on a lead researcher's expert opinion reviewed by three-to-eight others, converted into numbers for the purposes of summation and comparison. The methodological notes report debate over accuracy. The CPI approach may be the best comparative method yet devised, but is not really quantitative. A reverse problem appears in the strange claim of World Bank economists that 'telephone wait times' and 'phone faults' are "Objective Indicators of Good Governance" (Kaufmann et al. 2003: 50). They are certainly objective indicators, but only of the state of the phone system, or at most of economic development… not quality of governance.

The NIS country studies, by contrast, are prided on being entirely qualitative – their accuracy and usefulness flowing from the fact each report is based in 'bottom-up', subjective in-country experience (Doig & McIvor 2003b). Nevertheless claims to objectivity can be politically persuasive in the public policy world, leading TI to promote the NIS as an "audit tool" providing "clearer evaluatory criteria through

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[4] The Crime & Misconduct Commission Shepherdson Inquiry into Electoral Fraud (2000-01) highlighting systemic issues regarding policing of political candidate preselection processes; debate over effectiveness of legal professional complaint systems leading to a new public regulator (2001-02); and concern over effectiveness of the Director of Public Prosecutions leading to a review and more funding (2002-03).

which to assess individual pillars and horizontal accountability" (TI 2001: 2, 39-40). In large part this flowed from early efforts to site the Queensland pilot project within the language of audit, trying to find a teutonically neat way of assessing Queensland institutions against their own stated purposes and objective performance indicators, and then against an idealised model of their various relationships (Figure 7):

Figure 7. Parameters of Possible System 'Audit' (TI 2001: 39-40)

A. Individual Institutional Audit

Values	
Means of Promoting Values	Key Relationships
Reporting	Organisational & Accountability
Powers	relationships
Resources	Functional operational relationships
Origin and Development	
Legislation	Performance Indicators
Role	

B. Inter-Institutional Audit

Assessing within a four-fold matrix:

Intra-agency relationships	Agency-to-public relationships
Agency-to-agency relationships	Agency-to-integrity system relationships.

While all the topics and concepts presented above remain relevant, this model was subsequently abandoned in the Queensland pilot – as was the entire language of 'audit' (KCELJAG & TI 2001: 22-24). In Australian experience, even the expansive concept of 'performance auditing' used as a major accountability tool is restricted to assessing "economy, efficiency and effectiveness" against clear existing standards and structures, and is unable to provide complete assurances about entities' operations because an "expectation gap" always exists above and beyond such an assessment (Barrett 2004). For example audit remains potentially complementary but nevertheless differentiable from 'evaluation', the latter having a "strong focus on policy" and "qualitative assessment of policy effectiveness" (Barrett 2001).

   Both these lessons highlight that conventional performance assessment approaches to integrity systems, while important, cannot supply the full picture. If a particular framework of integrity values and institutions is in place – or if the political decision-making capacity exists to create or alter them – then performance audit and evaluation processes can have an invaluable role in establishing whether they are doing their job. However there is no existing clear performance assessment framework for political decision-making regarding integrity systems, nor may there ever be, hence the need for performance assessment to be embedded in a broader methodology. Some performance indicators will be quantitative, some will be qualitative, and as usual many will provide a mixture of both, with the final interpretation always necessarily political no matter what indicators are used. The question becomes how to a structure a methodology that combines the best, and avoids the worst of administrative performance assessment, as just one part of a holistic assessment process and not the whole box and dice.

Integrity and Humanity

Objective (d): promoting integrity as a personal quality

The fourth and final approach to integrity systems assessment is one that rediscovers the essential humanity of integrity – a reminder that when talking of integrity, we are talking not just about institutions and processes but also *people*, individually and collectively going about their lives. This approach is implicit in all three of the foregoing approaches, but in the shadow of other objectives can easily be lost. As we have seen, the economic approach tends to focus as much on the integrity of 'the market'; the democratic approach on the integrity of democratic institutions; and the administrative approach on the integrity of plans, programs and implementation processes. But what happened to honesty, uprightness, trustworthiness, reliability, honour – the personal qualities we demand in the groups and individuals to whom we entrust power?

The National Integrity System concept is predicated on a reality that trust in personal morals or 'goodness' alone will not insure against abuses of power – virtuous individuals are a scarce commodity, at least relative to demand, and it cannot be presumed they will always come good when and where we need them (Uhr 2002: 15; Preston et al. 2002: 68). Morals alone can even allow individuals to escape responsibility, if they surrender their "moral humanity" to the imperatives of cause, order or superior, or define their identity "solely by one aspect of themselves – such as ethnicity, gender, or religion" (Dobel 1999: x). Hence the need for systems; and yet their basic purpose is to ensure that people behave with honour. Purely technical accountability can still produce abuses of power, if officeholders have regard only for orders and not the "basic constitutional and regime values" of their society. Mechanical concepts of corruption as "pollution of the public by the private" fail to recognise that personal goals and self-interest are fundamental to performance in office, the challenge being how to reconcile and integrate these with honour (Dobel 1999: 10-11, 130). As long ago as the 11th century, the Chines reformer Wang An Shih declared history to have proved it "impossible to secure proper government by merely relying on the power of the law to control officials when the latter are not the right men for their job" (quoted in Alatas 1999: 4). Virtuous leadership is perhaps the most desired integrity quality among officeholders, and more important to anti-corruption efforts than new oversight bodies on empirical evidence from developing countries (Kaufmann 1999: 49, 93). To balance the 'values-based' or "results-oriented management" of the 'effectiveness' model, and verification on a 'legal-institutional' model, the key is to reintroduce the personal model: to recognise the value of personal merit and the deliberative talents it involves (Uhr 1999: 102; 2002).

How can an integrity system best promote integrity as a personal quality, and where does this idea of integrity sit in relation to related concepts of accountability and responsibility? Figure 8 sets out a first attempt to contrast the important distinctions between all three, applying lessons of Western 20th century sociology to the three models of integrity above. Just because a person obeys technical accountability on a legal-institutional model, does not mean they will be recognised as a person 'of integrity'. One of the most basic forms of integrity system, the 'integrity test', is directly personal just for this reason – an individual can be surrounded by, and satisfy a web of accountability systems, but when it comes to the

crunch of individual judgment they can still fail. Equally in daily human interaction, we often recognise people 'of integrity' simply through gut feeling, without analysing their past technical performance in delivering on promises or honouring their word. But these concepts are nevertheless related, with many paths lying between them. We see integrity systems as concerned with any and all of these paths.

Figure 8. Common Routes to Integrity

	Technical *Process-rational* (Institutional-Legal)	**Substantive** *Value-rational* (Implementation / Effectiveness)	**Personal** *Pre/post-rational* (Personal-Responsibility)
(Dobel's model)			
Accountability	Individual actions are, or can be held to account.	Individual actions invite, are open to accountability.	Accountability *makes* person trustworthy.
Responsibility	Individual actions are, or can be held responsible.	Individual actions are responsive, responsible.	Person *is* responsible, trustworthy.
Integrity	Actions accord with stated purposes/values; trust is honoured.	Actions are honest, honourable.	Person *is trusted*, has honour.

Source: A J Brown applying Weber (1954: 1) and Hoskin (1996) to Thynne & Goldring (1987: 4-7), Davis et al (1993: 79), Uhr (1993, 1999 #196), Schedler (1999), Dobel (1999) and Mulgan (2003: 7-22, 240).

Methodological issue (d): integrity and corruption as cultural narrative

How can an integrity system assessment take account of, and measure a society's personal integrity? The first question is easier to answer, and becomes fundamental to the any assessment methodology, because it emphasises that only by examining the way in which integrity and corruption are defined within a society, can we understand precisely the values and problems to which its integrity system is directed. In Australia's case, it forces us to consider the use and abuse of power as elements of our own political and social history, rather than in abstract. It provides a reminder of the fine line between "prudent action" and "political expediency" in public life, and consequently the real challenges of setting and maintaining integrity standards (Dobel 1999: 17-18).

General studies of Australia's overall track record of corruption – or integrity – are few but all the more valuable as a result. The major narratives conclude that despite its convict origins and poor track record of owning up to indigenous dispossession, post-colonial Australia is not a "very wicked place", generally deserving its reputation for high public standards, but that its "wish to be well regarded as honestly governed has usually been accompanied by a tolerance level too elevated for comfort and a resistance to corruption too slowly aroused" (Perry 2001: viii, 129). Our more celebrated integrity scandals are clearly not mere

aberrations on an inherently 'clean' political culture, but bubble to the service after long gestations, revealing deep-set dilemmas about when and how deteriorating standards can be recognised and rectified (Dickie 1988; O'Brien & Webb 1991; Gleeson et al. 1992; Tiffen 1999). Our responses tell us much about individual integrity foundations in our society, stories that explain not just our own experience of corruption, but our own processes for articulating it as a problem and doing something about it (Goodpaster 2002: 88-90). Particularly easily overlooked, is the role of religious, spiritual and other prematerial and postmaterial values in identifying what conduct we traditionally honour or condemn. In secularised, industrialised societies these values can be relatively diffuse but for that remain all the more important. It is worth remembering that the Greek temple on which the NIS is modelled – and similar neoclassical depictions of pillars and columns as democratic symbols, such as cover the OECD (2000) *Trust in Government* report – originally had a religious purpose more than an economic, administrative or even democratic one (Ancient Greek democracy having been practiced in the citizens' 'agorae' not the Gods' temples: Grant 1987: 4-5; Stockton 1990: 33-4). Every item of U.S. currency carries a similar reminder that it is not only in 'Liberty' but 'In God' that Americans trust.

Apart from taking better account of our own cultural narratives, the main methodological lesson is the reminder that in Australian public life, the cornerstone to integrity is indeed trust. In complex modern societies, human beings need "as far as they can, to economize on trust in persons and confide instead in well-designed political, social, and economic institutions", but there remain limits to how far such economy of trust can go (Dunn 1988/2000: 85-6). Concepts of integrity reveal the places in our society where it either has not, or cannot be compromised. The individual trustworthiness that defines personal integrity, connects with the trust placed in public and private officeholders to responsibly discharge power, and in turn with trust in institutions as a whole. The Business Integrity System Assessment conducted early in our project was the first component to explicitly stress individual integrity systems as a vital window upon the potential synergies and conflicts between integrity as practiced interpersonally, organisationally and societally (Kimber et al. 2001). Since the ultimate measure of the design and leadership of institutions is "the quality of integrity and judgment that they produce" (Dobel 1999: xii), trust remains the ultimate measure of our integrity system, and gauge to how it might be improved. In sociology, organizational psychology and political science, trust can be and is being measured qualitatively and quantitatively, even if not providing the catch-all indicator of good governance some may have hoped (Bouckaert & Van de Walle 2003). The different approaches to integrity system assessment can be bound into a holistic reality by more closely analysing who trusts who, how much, and why.

Conclusions: Towards a Framework Methodology

This paper has reviewed the four main objectives of existing efforts in integrity system assessment: *(a)* economic development, *(b)* the promotion and enhancement of democratic accountability, *(c)* ensuring cost-effective administrative performance and *(d)* an upgrade in the qualities of personal integrity lived out in public and

commercial life. The discussion confirms the validity of *(b)* and *(c)* as motivations for an assessment of Australian integrity systems, but also shows why a stronger awareness of *(d)* is needed to bring the three dimensions of integrity scrutiny back into balance. An Australian National Integrity System Assessment (NISA) is most clearly differentiable from *(a)*¸ notwithstanding the historical significance of deregulatory prescriptions as an international driver of governance reform and the role economics should continue to play in assessment methods.

En route, we have identified eight key methodological problems with various existing approaches, including the earlier phases of our own project: inadequate attention to the non-government sectors; geographic superficiality; the ease with which institutional foci can divert us from the goal of a holistic 'mapping' approach; the problem of measuring existing institutions against their own existing structures and standards; overdependency on self-assessment leading to non-assessment; the difficulty of incorporating 'objective' audit-style methods into an inherently political evaluation; the need to reincorporate history, culture and narrative; and the potential of trust as a focus for study, linking integrity's three major models or dimensions.

What type of assessment methodology emerges from these lessons? First, it should be one based on greater clarity and precision, rather than one in which the major answers are already part-presumed but not transparently so, leading to uncertainty as to what was originally intended and what has, or hasn't, been validated. From there the recommended framework proceeds on two principles. First, we need to take some care in reaching an agreed understanding of what our national integrity systems are, and how they currently function, before going on to assess how *well* they function and how they might best be improved, supplemented ort replaced. Second, all three dimensions of public integrity in our social and political tradition need to be brought back into both these analyses, replacing the current over-focus on institutional templates and avoiding potential over-focus on administrative performance outcomes.

Describing Integrity Systems

This paper has helped clarify what we mean by 'integrity', and why we are seeking to assess its systems – but what do our current systems currently look like? We know they contain many institutions, but perhaps not all the right ones, and the role of some institutions may have been escaping our notice altogether. We know they contain many processes, but these are cultural, social and political as well as simply administrative. We know that individuals have critical roles to play in enhanced integrity, but usually only recognise these after the event. The method used for describing existing integrity systems – good, bad or indifferent – is just as important as how one assesses them, because without a truly three-dimensional view, no reform prescriptions are likely to have value. In particular, the description should not commence with a template of desired institutions in mind, but rather a full description of what exists.

To fulfil its potential as a tool of social and political diagnosis, integrity system 'mapping' needs to begin with an acceptance that different interpretive approaches will produce different types of map. Three quite different approaches can be taken to this descriptive task, as highlighted through this paper. Figures 1, 3 and 5 all take a ***structural*** approach, largely because they begin with institutions and their

components; the conceptual parallels are obvious between the NIS "temple", the Global Integrity evaluation of anti-corruption "architecture" (Lewis 2004), and the OECD's ethics "infrastructure". These are all useful graphical metaphors, but putting aside questions of historical accuracy and intercultural transfer, they so far remain one-dimensional. The remaining figures are not yet based on any fixed metaphor, but begin to add other dimensions, and our discussion noted the need to add geography to our picture of integrity system configuration – all suggesting a different range of *spatial-systemic* approaches. Finally the concept of 'ecological integrity' (Preston 2001) reminds us of a further range of *anthropological-ecological* approaches to modelling relationships with less regard for structuralist metaphors, many of which we expect are technically highly developed. These approaches need not be exclusive, with any combination useful for 'mapping' the existing integrity system in a given context. The point is to find what is most useful for tracing the critical elements of integrity systems in institutional, process and human terms, and understand how they currently interact, irrespective of what we think *should* occur.

Assessing Integrity Systems

The clearer distinction between the descriptive activity needed to understand integrity systems as they *are*, and the evaluative activity involved in suggesting reforms, is a first major step for escaping from a 'laundry list' of preferred institutions as the primary means of analysing what might be right or wrong. While inherited and imported institutions remain integral, they represent an inadequate primary focus and don't themselves supply an evaluative method. The lesson remains particularly vital for any adaptation of this methodology for international capacity-building, because even at a national scale, we continue to make the mistake of trying to 'fly in' other jurisdictions' laws and bodies at the expense of bottom-up institutional design.

For this reason, along with the other methodological issues identified earlier, our recommended approach to assessment begins with further distinctions between three major assessment themes (Brown 2003a), cutting across all three of the identified dimensions. The first critical issue is not what institutions exist within the matrices of integrity systems, but whether the systems have the *capacity* to achieve what was intended, or what might objectively be described as needed to achieve their goals. This may come back to what is fundamentally an analysis of institutions, but remains open to other options. Second, the mapping effort becomes particularly useful for evaluating the *coherence* of systems, again possibly primarily in terms of institutions, but also more broadly, working through when particular degrees of coherence are good or bad. Thirdly, we need concrete guidance about the effects or *consequences* of integrity systems, both in terms of administrative performance and of broader democratic quality and levels of public trust. Together we expect these themes to throw up enough key issues and evidence to support reform that might itself be described as having 'integrity'.

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