

DOCTORAL THESIS

International Integrity Management Frameworks: Does One Size Fit All?

Leno Saarniit

TALLINN UNIVERSITY OF TECHNOLOGY
DOCTORAL THESIS
18/2024

**International Integrity Management
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Does One Size Fit All?**

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This dissertation was accepted for the defence of the degree 15/03/2024

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Declaration:

Hereby I declare that this doctoral thesis, my original investigation and achievement, submitted for the doctoral degree at Tallinn University of Technology has not been submitted for doctoral or equivalent academic degree.

Leno Saarniit

signature

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ISSN 2585-6898 (publication)

ISBN 978-9916-80-123-9 (publication)

ISSN 2585-6901 (PDF)

ISBN 978-9916-80-124-6 (PDF)

DOI <https://doi.org/10.23658/taltech.18/2024>

Printed by Koopia Niini & Rauam

Saarniit, L. (2024). *International Integrity Management Frameworks: Does One Size Fit All?* [TalTech Press]. <https://doi.org/10.23658/taltech.18/2024>

TALLINNA TEHNIKAÜLIKOOL
DOKTORITÖÖ
18/2024

**Rahvusvahelised eetika juhtimise
raamistikud:
kas sama lahendus sobib kõigile?**

LENO SAARNIIT



Contents

List of Publications	6
Author's Contribution to the Publications	7
Introduction	8
1 Methodology.....	13
2 Approaches to Integrity Management.....	16
3 Context and Integrity Management.....	20
3.1 Theoretical Concept of Context	20
3.2 Integrity Management Frameworks and Context.....	22
3.3 Integrity Management Frameworks and the Local Context: The Gap	26
4 Integrity Management in Post-Communist Countries	28
4.1 Background	28
4.2 Corruption Profile	29
4.3 Integrity Management	31
5 Integrity Management in Small States.....	37
5.1 Background and Corruption Profile	37
5.2 Integrity Management	38
6 Discussion.....	41
7 Avenues for Further Research.....	44
References	46
Acknowledgements.....	61
Abstract.....	63
Lühikokkuvõte.....	66
Appendix 1	69
Appendix 2	87
Appendix 3	115
Appendix 4	143
Appendix 5	165
Appendix 6	193
Curriculum vitae.....	217
Elulookirjeldus.....	219

List of Publications

- I Saarniit, L. (2006). A Public Service Code of Ethics Applied in a Transitional Setting: The Case of Estonia. *Public Integrity*, 8 (1), 49–63. (ETIS 1.2)
- II MacCarthaigh, M., Saarniit, L. (2019). Administrative Culture. In: *Oxford Research Encyclopedia of Politics*. Oxford University Press. 10.1093/acrefore/9780190228637.013.1452. (ETIS 3.1)
- III Saarniit, L., Pevkur, A. (2019). Teaching Ethics in Academic Curricula: Case of Five Disciplines in Estonian Public Universities. *Ethical Perspectives*, 26 (1), 33–58. 10.2143/EP.26.1.3286288. (ETIS 1.1)
- IV Saarniit, L., Sarapuu, K. (2024). Corruption and Country Size: Insights from Small State Studies. *Halduskultuur – The Estonian Journal of Administrative Culture and Digital Governance*, 22 (2), xx-xx. (ETIS 1.1)

Appendix

- V Saarniit, L., Sarapuu, K. Taking Stock of 30 Years of CEE Transformation: Institutionalisation of Integrity Management System in Estonia. Manuscript submitted to the *NISPAcee Journal of Public Administration and Policy*. (ETIS 1.1).
- VI Sarapuu, K., Saarniit, L. (2020). Public Administration in Estonia: A Search for Identity. In: Bouckaert, G.; Jann, W. (Ed.). *European Perspectives for Public Administration. The Way Forward* (317–333). Leuven University Press. (ETIS 3.2)

Author's Contribution to the Publications

Author's contribution to the papers in this thesis are:

- I The author of the thesis is the **sole contributor** to this publication.
- II The author of the thesis contributed **30%** to this publication. She co-researched and co-wrote the sections on the dimensions of culture, rewrote the sections on analytical questions and administrative reform and contributed to respective research, conducted preliminary research, and wrote the first version for the sections on administrative culture.
- III The author of the thesis was the lead author of the article and contributed **60%** to this publication. She co-developed the theoretical framework and methodology. She also carried out document analysis, conducted interviews, and co-wrote the analysis.
- IV The author of the thesis was the lead author of the article and contributed **50%** to this publication. She wrote the sections on the contextual factors of corruption and country size as an explanatory factor. She also co-wrote the analysis, discussion, and conclusion.
- V The author of the thesis was the lead author of the article and contributed **60%** to this manuscript. She co-wrote conducted document analysis and interviews. She also co-wrote the theoretical framework, analysis, discussion, and conclusion.
- VI The author of this thesis contributed **20%** to this publication. She helped to outline the idea for the chapter and wrote a section on the links with practice.

Introduction

The ethical behaviour of rulers has been a topic in political philosophy treatises and governance research for centuries, with extensive collection of “mirrors for princes” in Europe (Lambertini 2011), Islam (Blaydes, et al. 2018; Hillenbrand 2004, Marlow 2009), Byzantium (Prinzing 2023), etc., encouraging them to “examine what [they] should be and how [they] should behave” (Perret & Péquignot 2023, p. 2). However, the focus of the discussion has shifted considerably over time. Instead of focusing on what characterises a good ruler and why certain behaviours are good and others bad, the main questions today concern ensuring the integrity of civil servants and politicians and preventing corruption. In short: the scholarship focusses on integrity or ethics management, defined as “activities undertaken to stimulate and enforce integrity and prevent corruption and other integrity violations within a particular organisation” (OECD 2009, p.9). Thus, the focus has turned to analysing the best methods for reducing opportunities for wrongdoing, the rules to adopt and implement, the ways of preventing and detecting integrity violations, and how to institutionalise and manage the necessary instruments and functions.

To answer these questions, the past decades have seen a surge in national anti-corruption and integrity policies, adoption of international anti-corruption conventions¹, and, of course, academic research on the topic. A most notable trend has been the emergence of “anti-corruption norm” (McCoy & Heckel, 2001) with anti-corruption and integrity policy advice becoming a “major industry” (Mungiu-Pippidi, 2006, p. 86), involving international organisations (Andersson & Anecharico, 2019, p. 11; Pal 2019, p. 501; Cafaggi 2019, p. 601–602), such as Transparency International (TI), World Bank (WB), the International Monetary Fund (IMF), the United Nations (UN), European Union (EU), the Organization of Economic Cooperation and Development (OECD), and the Council of Europe Group of States against Corruption (GRECO). This international industry relies on providing ““toolkits” of ideas /.../ in line with the logic of a “one fits all” approach” (Persson et al., 2010, p. 6), based on merging different instruments and functions into comprehensive integrity management frameworks (Tremblay et al., 2017, pp. 3–4; Andersson & Anecharico, 2019, p. 68; Maesschalck et al. 2024, p. 542). TI claims that “there is a growing international consensus as to the salient aspects that work best to prevent corruption and promote integrity” (TI 2012a, p. 3). These frameworks defined by Maesschalck et al. (2024, p. 543) as interconnected set of deliberate measures and actors implementing them, are used for policy learning, analysis, assessment, comparison, and recommendations, and as often is the case, praising some countries, while criticising others. As Mungiu-Pippidi puts it: “it has become fashionable for governments to invite international corruption-assessment missions” (2006, p. 91).

As there is a wide-spread consensus that “corruption is detrimental to the integrity of governance, to trust in democratic processes, and to effective decision making and administration” (Andersson & Anecharico, 2019, p. 7), the integrity management frameworks tend to emphasise similar benefits, such as the promotion of integrity and prevention of corruption, ensuring reliable public services, impartial treatment of

¹ For example: OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997); United Nations Convention against Corruption (2003); Council of Europe Civil Law Convention on Corruption (1999); Council of Europe the Criminal Law Convention on Corruption (1999).

citizens, effective and efficient use of public resources, and transparent decision-making procedures (OECD, 2000, p. 11) or even wider goals, such as “equitable growth, sustainable development and social cohesion” (TI 2012a, p. 3). They are also similar in their underlying assumption that corrupt countries should replicate the policies and institutions of clean countries and that with the support of international organisations they can curb the corruption (Mungiu-Pippidi, 2006, p. 96). This assumption is facilitated by the Western universalist outlook that “every society works, or should work, essentially the same way” and countries that fail “to conform to this model [are] seen as underdeveloped or dysfunctional” (Hooker 2009, p. 252).

These toolkits and assessment frameworks have been compiled by identifying “the best practices” of national policies and uploading them to the international level. The OECD report “Trust in Government”, which focuses on the “mechanisms promoting integrity and countering wrongdoing” (OECD, 2000, p. 22), surveyed its (predominantly European and Anglo-American) member states for best practices, defining the main elements of ethics infrastructure and its functions. This group of countries is also reflected in the later frameworks (OECD 2009; OECD 2020) and is especially apparent in the referenced sources. Transparency International’s National Integrity System (TI NIS) approach was designed by identifying existing and emerging national practices and focusses on the role of institutions in preventing corruption (Pope, 2000; TI 2012a), including democratically elected parliaments, independent judiciary, independent and free media, active civil society, and others (Pope 2000; TI 2012a).

Although fair and just governing systems are not “confined to Europe but embrace all regions of the world” (Pope 2000, p. 10), with Chinese civil service exams regarded as „primary grand example” that corruption can be prevented and controlled from inside of the public administration (Drechsler 2013, pp. 330-331), “the scientific debate on ethics management is mostly Western based” (Lašakova et al. 2021, p. 57). In short, the current anti-corruption and integrity management frameworks seem to be based on the same group of countries: Western (i.e. predominantly European and Anglo-American) countries, that are democratic, mostly wealthy and politically stable, with relatively large populations and well-functioning administrative system and rule-of-law, strong civil society, and free media. This choice of countries also corresponds clearly with what Drechsler (2013) has called the Western paradigm of governance.

As all the integrity and anti-corruption policies have been originally designed for a specific organisation or a country with specific corruption risks and challenges, political and administrative culture, institutional framework, and socio-economic situation, they also work the best in that specific environment. However, when these policies are uploaded into frameworks as best practices, that specific context for which they were designed, often gets lost or becomes vaguely implied. As has been shown by several authors in various fields, the “best” practice is not necessarily a universally applicable practice as it often relies on an incomplete understanding of the practice, overemphasises copying, disregards diversity of organisations, contexts, and dynamic environments, and underestimates the need for adaptation and innovation (see, for example, Bardach & Patashnik, 2020; Pal & Clark 2013; Bretschneider et al. 2004; Gibson 2012). Thus, an issue emerges: what happens when the integrity policies that have been developed for democratic, stable, and wealthy Western countries, with relatively low

levels of corruption, high administrative capacity², and large populations, are downloaded to countries that do not fit this description?

This question becomes especially relevant when these frameworks are often (but not exclusively) used normatively in Non-Western and/or developing countries, to determine what policies and instruments should be adopted and implemented and to assess the goodness of the integrity management system. However, as Hooker (2009, p. 252) has pointed out Western cultures tend to be more rule-, than relationship-based, with more trust put in the system³. Consequently, the Western idea might not be universally transferable. As the issue of how context influences the transfer of integrity management instruments has not garnered sufficient attention in the academic literature, more than two decades of experience offers a chance to look back at these frameworks and analyse how they have performed in various contexts.

Therefore, the main aim of the dissertation is to analyse how context influences the design and implementation of integrity management instruments. The thesis focuses on two understudied contexts: post-communist transformation and small states. These contexts form relevant research objects for several reasons. First, existing academic and policy research has not paid sufficient attention to integrity management in these two contexts. In case of small states, defined as those with small populations (see e.g., Baldacchino & Wivel, 2020; Briguglio, 2018), corruption research largely disregards population size as a variable (**IV**) and small state studies are usually limited to the occasional references to particular forms of corruption (**IV**), integrity challenges stemming from small social fields (**IV**) or case studies of specific countries (e.g. Walton 2021a, 2021b; Walton & Hushang 2022; Weeramantry & Mohan 2017; Corbett & Shiu 2014). Nevertheless, although there are some comparative studies (Larmour & Barcham 2006; Larmour 2008, 2009; Corbett 2013a; 2013b; Walton & Dinnen 2019; Borlea et al. 2019; David-Barrett et al. 2020; Gascoigne 2023), there is no systemic discussion on integrity management in the small state context. Regarding post-communist transformation in Central and Eastern Europe (CEE), the focus has been more on the corruption profiles of the countries (which forms of corruption have emerged in the context of post-communist reforms and why) and anti-corruption reforms, including large scale economic reforms (see, for example, World Bank, 2000; Karklins, 2002; Zaloznaya, 2017). Although integrity management is a crucial element in combating corruption, this topic has not received sufficient attention in academic research.

Second, both contexts present specific combinations of political, administrative, cultural, and economic factors that influence not only the corruption risks and corruption profiles of the countries, but also how corruption might be prevented and ethical behaviour promoted. In the context of small states, the particularistic relationships, economic profile, and political and administrative context create specific corruption risks that might require different approaches to integrity management (see, for example, Larmour, 2008; Larmour & Barcham, 2006). In post-communist states, rapid political, administrative, and economic reforms have created favourable conditions for different forms of corruption, while the changing political and administrative culture and societal norms combined with lacking legislation and control structures have not been able to curb it. Additionally, the external pressures resulting from the accession to the European

² Administrative capacity refers to the „ability to manage efficiently the human and physical resources required for delivering the outputs of government“ (Painter & Pierre 2005, p.2)

³ For public value comparisons see for example Van Der Wal & Yang 2015, Yang & Wan Der Wal 2014.

Union (EU), various sources of policy advice (e.g., Council of Europe, OECD, IMF, World Bank) and competing reform paradigms (see, for example, Randma-Liiv & Drechsler, 2017, p. 599; Drechsler, 2005) have provided controversial requirements and recommendations. The latter have presented the transforming countries with difficult choices due to lack of local expertise, analysis of local context, and low administrative capacity. These factors may create barriers and constraints to integrity management, but also require adapting the prescribed good practices.

As the aim of the thesis is to analyse the impact of context, the focus is on integrity management on the level of public administration systems, not on individual public organisations. Although integrity management is sometimes seen as a task for the organisational level (see OECD, 2009), the existing frameworks emphasise the importance of the system level that establishes the structure in which individual organisations operate, including legal frameworks, integrity management instruments, oversight functions, etc.

The main research questions for the thesis are as follows:

1. How is context conceptualised in various integrity management frameworks?
2. How does post-communist context shape the choice and implementation of integrity management instruments?
3. How does small state context shape the choice and implementation of integrity management instruments?
4. How should integrity management toolkits and resulting policy advice take into account different contexts?

The main body of argument is developed in six original publications. Two publications (**II**, **IV**) are theoretical in nature and focus on specific contextual aspects – the administrative culture and small state context, respectively. Four publications (**I**, **III**, **V**, **VI**) are centred around the case study of the chosen country – Estonia, which qualifies both as a small state and a post-communist state and offers a perfect environment for studying the issues related to these specific contexts. As the author has been participating in various capacities as an expert and lecturer in the development of Estonian public service integrity management, the papers have been published over more than 15 years. The longitudinal perspective allows a deeper insight into the development and implementation of the integrity management system in Estonia and permits generalisations of wider relevance.

The first publication (**I**) analyses the drafting and early implementation issues of the Public Service Code of Ethics (1997–2004), focusing on the context of post-communist transformation and its influences. The chapter “Administrative Culture” (**II**, co-authored with Muiris MacCarthaigh) provides relevant background in two respects: firstly, it shows how the concept is often used as an independent variable explaining the divergence and variety in policy outcomes in various contexts, and secondly, its interpretation as the shared beliefs and practices in public service is a crucial aspect of integrity management. The article “Teaching Ethics in Academic Curricula” (**III**, co-authored with Aive Pevkur) analyses how a compartmentalised approach to teaching ethics in academia jeopardises integrity in the public service. Although the articles focusing on the case of Estonia tend to emphasise the post-communist context, the small state context plays an important role in multiple papers (**III**, **V**). The article “Corruption and Country Size: Insights from Small State Studies” (**IV**, co-authored with Külli Sarapuu) discusses the topic in more detail. This article (**IV**) shows how country size is a significant contextual characteristic

that affects economic, political, and socio-cultural factors of corruption, thus creating specific corruption risks and challenges for integrity management. The manuscript on the institutionalisation of integrity management systems in Estonia since regaining independence (**V**, co-authored with Külli Sarapuu) traces the main integrity management reforms over the last 30 years, starting with the early post-communist transformation in the 1990s and analysing the main factors explaining the changes in the integrity management system. The chapter “Public Administration in Estonia: A Search for Identity” (**VI**, co-authored with Külli Sarapuu) provides additional information on the context of Estonian public administration education, including connections between academia and practice in public service ethics.

The introductory discussion of the thesis starts with the description of the methodology and the case of Estonia. This is followed by the analysis of different approaches to integrity management and their criticism. Subsequent sections discuss the concept of “context” and how it relates to integrity management, post-communist transformation, and small states. The last chapter focuses on discussion and conclusion and outlines suggestions for further analysis. The thesis contributes to the integrity management scholarship theoretically as well as empirically. Regarding theoretical discussions on integrity management, the thesis adds to the discussion on the relevance of context in the choice and implementation of integrity management instruments. On an empirical level, the study of the development and implementation of integrity management instruments in Estonia analyses the opportunities and pitfalls of specific integrity management policies in a small post-communist country.

1 Methodology

The thesis employs several qualitative research methods, including literature review, document analysis, and interviews (see table 1 for overview). Although they are seen to have several drawbacks (e.g., lack of representativeness and reliability, lack of objectivity, openness to interpretation, low generalisability (Flick 2023, pp. 489–495; Devine, 2002, pp. 204–207; Sadovnik, 2007, p. 424), qualitative research methods enable in-depth study of a case that is embedded in local context, thus allowing the identification of contextual factors and the study of dynamic processes (Flick 2023, pp. 489-495; Devine, 2002, p. 199; Sadovnik, 2007, pp. 423–424), making the qualitative methods particularly suitable for answering the research questions of the current thesis.

Table 1 Overview of the research methods used in the original publications.

Publication	Literature review	Document analysis	Interviews
Saarniit 2006 (I)	X	X	X
MacCarthaigh & Saarniit 2019 (II)	X		
Saarniit & Pevkur 2019 (III)	X	X	X
Saarniit & Sarapuu 2024 (IV)	X		
Saarniit & Sarapuu (manuscript) (V)	X	X	X
Saarniit & Sarapuu 2020 (VI)	X	X	

All publications employ literature review as a research method. Literature review as a method allows the researcher to identify results, gaps, and flaws in previous studies (Mertens, 2009, p. 90–91), making it possible to build on existing research (Xiao & Watson, 2019, p. 93). In three publications (I, III, V), literature review is used to establish a theoretical background for the empirical study by identifying a research problem and showing the new contribution to the existing scholarship (Pare et al., 2015, p. 183). The article on administrative culture (II) is a narrative review aimed at conceptual clarity, defining the concepts, key terms, and main findings within the field. Although narrative reviews are selective in their choice of reviewed literature, and thus vulnerable to subjectivity (Pare, 2015, p. 185), their main benefit is the summarisation of previous knowledge. The publication on small states and corruption (IV) can be classified as a theoretical review. Its main aim is to integrate different streams of research, investigate their relationships, and discover and analyse common topics and issues, making it possible to develop “novel conceptualizations or extend current ones by identifying and highlighting knowledge gaps between what we know and what we need to know” (Pare et al., 2015, p. 188). None of the publications can be classified as systematic literature reviews, as they do not employ comprehensive and pre-structured search strategies.

Four publications use document analysis as one of the primary sources of data. On the one hand, the documents (e.g., legislation, explanatory memoranda, memos, transcripts, curricula, etc.) can be a primary source of evidence, while on the other hand, they give the researcher a sense of the times (Yanow, 2007, p. 410). In the original publications, document analysis is mostly used in the former sense, providing information on the development of various integrity management policies and background information prior to conducting interviews. Three publications use

semi-structured expert interviews. The semi-structured expert interviews allow the interviewee to talk in their own terms about their experience and elaborate on their thoughts, while placing their experience in a wider social setting (Devine, 2002, pp. 198–199). Therefore, it allows the researcher to obtain rich, in-depth data, gain insights into the interviewees' perspectives, and develop a contextual understanding, while triangulating and validating other data sources, such as documents. However, as with other qualitative methods, interviews and document analysis are prone to the same weaknesses, e.g., limited generalisability, subjectivity in interpretation, researcher bias, etc. (Flick, 2023, pp. 489–506).

Four publications (**I**, **III**, **V**, **VI**) are case studies, employing the aforementioned qualitative methods as well as different quantitative data sources, including statistics on corruption, international indexes, and corruption and integrity (management) surveys conducted in Estonia. Use of multiple methods for data gathering ensures the validity and reliability of conclusions (van Thiel, 2022, p. 92). These studies are different in nature, with studies **V** and **VI** analysing the case over a longer period of time (since the 1990s), while studies **I** and **III** (though discussing the (historical) background as well) present a snapshot of an issue in a given moment in time.

The case study as a research strategy presents several opportunities for answering the research questions of the thesis. As the main aim of the thesis is to investigate how various contextual factors influence the design and implementation of integrity management, the case study approach enables the author to analyse context-dependent knowledge and gain a nuanced view of integrity management practices (Flyvbjerg, 2006, pp. 222–223; see also Yin 2018; for uses in corruption research see de Graaf & Huberts 2008). However, one of the main downsides of a case study is its limited external validity (van Thiel, 2022, p. 88).

The choice of Estonia for the case study is motivated by several factors. Estonia is a small post-communist country. After 50 years under Soviet occupation, Estonia regained its independence in 1991. Since then, Estonia, a unitary parliamentary republic, has gone through major political, administrative, and economic reforms. Within a month of regaining its independence, Estonia became a member of the United Nations, followed by membership in the European Union and NATO in 2004, and OECD in 2010. Although Estonia is considered a high-income economy by the World Bank, its GDP per capita remains below EU average. With its 1.365 million inhabitants, Estonia is one of the smallest countries in the EU and among other post-communist countries. 32% of the population is a mainly Russian-speaking minority. For the past twenty years Estonia has signed and ratified multiple anti-corruption conventions and cooperated with various international organisations in the field of anti-corruption and integrity management reforms (**V**). Based on various international indexes (TI Corruption Perceptions Index⁴, WB Governance Indicator: Control of Corruption) and surveys (Eurostat), Estonia remains the least corrupt country among the post-communist countries and one of the least corrupt countries in the world.

First, the mixture of a post-communist country and a small state enables addressing the research questions on the specificities of these contexts, but also permits the exploration of possible overlaps between the two. Second, with 30 years of continuous

⁴ Transparency International Corruption Perceptions Index has included Estonia since 1999, scoring 5,7 (out of 10), while the most recent score of 76 (out of 100) places Estonia in 12th position. World Bank Control of Corruption indicator shows Estonia's rise from 70th percentile in 1996 to 90th in 2022.

integrity management reforms, the case of Estonia illustrates the changing and cumulative choices of integrity management instruments, their implementation and the actors behind the choices, as well as the critical events in the evolution of the integrity management system. Analysing changes over time also facilitates a deeper understanding of the systemic transformation and allows for the identification of patterns and results. Therefore, it is useful for informing further policy decisions.

Third, compared to other post-communist countries, Estonia can be characterised as an outlier with its relatively low level of corruption. As Flyvbjerg (2006, p. 229) points out “atypical or extreme cases often reveal more information because they activate more actors and more basic mechanisms in the situation studied”. Estonia, with its 30 years of continuous integrity management reforms, offers relevant information on the institutionalisation of integrity functions in a post-communist context and valuable insights into the mechanisms that have been at work. However, it also means that not all conclusions that are valid for Estonia can be generalised for all post-communist or small states.

2 Approaches to Integrity Management

This dissertation analyses five international frameworks concerning integrity management by OECD, Transparency International and Council of Europe. These are commonly used for policy analysis, assessment, and/or policy advice (see Maesschalck et al. 2024 for examples on TI NIS and OECD 2009; Macaulay & Mulcahy 2017 for NIS assessments) and have also been developed further within academic scholarship (see for example Tremblay et al. 2017).

First is the ethics infrastructure (OECD, 2000), which is based on the survey of OECD members' anti-corruption instruments and processes. It emphasises the interaction of eight different elements – political commitment, codes of conduct, professional socialisation, ethics coordinating body, public service conditions, effective legal framework, efficient accountability mechanisms, and active civil society. These elements are aimed at guiding, managing, and controlling standards of ethical behaviour (OECD, 2000, pp. 23–25). The OECD ethics infrastructure also outlines the compliance (rules) and integrity (values) based approaches to several elements (OECD, 2000, pp. 25–26). The main focus of the ethics infrastructure is on the systemic level – how the system is organised on the level of public administration in general. As such, the ethics infrastructure provides a snapshot of existing practices in OECD countries, offering valuable information on good practices and ideas about which factors to look for (e.g., the role of politicians and civil society). However, the main elements remain rather unspecific and are therefore difficult to operationalise for actual analysis.

The integrity management framework is OECD's second toolkit (2009) and lists approximately 40 instruments and various processes aimed at preventing corruption and promoting ethical behaviour. Unlike the systemic level approach of the ethics infrastructure, the integrity management framework focuses on individual organisations, stating that in order to achieve the "culture of integrity" (OECD, 2009, p. 9) every organisation should develop instruments, processes, and structures aimed at ensuring the ethical behaviour of its employees. With the focus on the ethical needs of the organisation (Andersson & Anechiarico, 2019, p. 72), the implemented instruments should perform four main functions: determine and define integrity, offer guidance to employees, monitor the situation, and enforce the rules, providing lists of instruments for each function (OECD, 2009, pp. 21–74). The integrity management framework also emphasises the blend and balance of rules- and values-based instruments (OECD, 2009, p. 12; see also Andersson & Anechiarico, 2019, p. 69). However, as Hoekstra et. al. (2016) and Huberts (2014) explain, the methodology for assessing the balance between different methods and their impact is lacking.

The third OECD approach is the Public Integrity Handbook (2020) and it reiterates several aspects of the earlier frameworks. Similarly to the ethics infrastructure and the integrity management framework, it emphasises standards for ethical behaviour, oversight, and enforcement. However, it introduces additional aspects of integrity management, such as the whole of society approach, which focuses on cooperation with civil society and the business sector, describes leadership instruments in public service, outlines the benefits of the merit principle in more detail compared to the integrity management framework, discusses capacity building, etc. Although the key elements and underlying logic remains very similar to the earlier publications, the PI Handbook contains more examples from various countries.

The fourth framework is Transparency International's National Integrity System (from here on TI NIS) (TI, 2012a⁵). It has been constructed as an analytical framework to be used in assessing the capacity of a country's institutional system in preventing and combating corruption. The main aim is to evaluate institutions, primarily of the public sector (or the "pillars"), that should contribute to anti-corruption policies (e.g., legislature, executive, judiciary, public sector, national audit office, ombudsman, etc). These institutions are evaluated (on paper as well as in practice, i.e., it is assessed whether certain characteristics and instruments are present in legislation and whether existing legislation is implemented) based on various criteria, such as resources, independence, transparency, accountability, integrity, and its role in anti-corruption activities. Similarly to the OECD's approaches, the NIS also lists multiple integrity management instruments, but it also adds a link between certain functions and institutions and pays more attention to the division of tasks between different institutions. For example, one of the pillars is the "anti-corruption agency" which is seen as having the role of educating and investigating, while the pillar of the "public sector" is assessed based on its role in public education and cooperation as well as in coordination between the public sector, civil society, and private sector organisations. Another similarity can be found between the institutionalisation of the OECD's integrity management and NIS's evaluation in practice. Both emphasise the importance of the implementation of various instruments.

Fifth, Guidelines of the Committee of Ministers of the Council of Europe on Public Ethics (2020) is the newest framework. It is also the only one that functions as a soft law for the member states. These guidelines emphasise several common integrity management instruments, including rules and regulations on standards of conduct, guidance, as well as the importance of a national strategy for public ethics, existence of independent authorities for providing oversight, and "promoting transparency in public life" (Council of Europe, 2020, F.1). However, in addition to the common elements, these recommendations also outline the conditions for an effective public ethics framework (Council of Europe, 2020, B.1) and the principles of public ethics (Council of Europe, 2020, D.1). The conditions are somewhat similar to the contextual foundations of the NIS (see chapter 4.2 for more discussion), while only OECD (2000, p. 32) outlines the principles or values in public ethics.

As mentioned above, such frameworks are often used as a basis for analysis, assessment, and policy advice. OECD's integrity management framework (2009) and public integrity handbook (2020) are mostly examples of the latter, offering examples of integrity management instruments, processes and structures that can be used as a basis for developing one's system. The other two frameworks have predominantly been used as a basis for analysis. OECD's ethics infrastructure (2000) was aimed at getting a snapshot of existing practices, without evaluating their soundness, while the methodology of the NIS requires specific assessment that is based on preset criteria. Thus, the NIS methodology (TI, 2012a) can be seen as somewhat normative: for example, the absence of certain integrity instruments would require a researcher to lower the score for an institution. The frameworks also differ in their focus on the organisational vs the systemic level. While the TI, NIS (2012a), and the OECD (2000) ethics infrastructure focus on the

⁵ The earliest versions of TI NIS framework were developed in the 1990s (see for example Pope 2000), however, for current dissertation the most recent version of methodology will be used.

systemic level, the OECD (2009) approach focuses on the organisational level and OECD (2020) mixes both – organisational as well as system level instruments.

Approaches to integrity management are not unproblematic. Becker and Karssing (2024, p. 313) criticise the underlying assumption of these frameworks that integrity could be managed at all, claiming that moral duties elude calculation, while moral motivation is impossible to instrumentalise – two inherent expectations in modern management practices. Lasthuizen et al. (2011), Hoekstra et al. (2016) and Huberts (2014) criticise integrity management frameworks for lacking clear methodology to assess the balance between different values and compliance. Tremblay et al. (2017) point out that integrity management has three crucial limitations, including its focus on regulating just the individual behaviour, but disregarding collective and strategic levels, the variable nature of controls and the difficulties of integrating them, as well as the lack of varied instruments and procedures to manage diverse integrity issues. Lašakova et al. (2021, pp. 55–56) criticise integrity management frameworks due to their set of measures while not sufficiently grounded empirically, being still limited due to the included practices. TI NIS methodology has been criticised for its lack of agreement on the intent and nature of NIS design (Macaulay et al. 2014), while the assessments pre-dating 2010 for their lack of standardisation and thus considerable variation in their contents and scoring (Macaulay and Mulcahy 2017, p. 294), leading to limited generalisability and comparative value (Macaulay and Mulcahy 2017, p. 294; Transparency International 2012b).

Nevertheless, one of the key issues in integrity management, dating back to the 1930–40s Friedrich-Finer debate, has been whether integrity management should rely on external controls and adherence to rules or whether ethical behaviour could be achieved by reliance on personal values and self-regulation (Andersson & Anechiarico, 2019, pp. 63–64). The compliance or rules-based approach tends to focus on codes of conduct, laws, formal rules, monitoring, and sanctions (Tremblay et al., 2017), while the values-based approach relies on self-regulation that is based on commitment to organisational values (Andersson & Anechiarico, 2019, p. 64). These two opposing views were not used in a complementary fashion until the 1990s, when the TI NIS (Pope, 2000) and OECD's ethics infrastructure combined them to establish systematic foundations for preventing corruption and promoting integrity (Tremblay et al., 2017, p. 3). Over the past two decades, there is consensus that as these two approaches have a different effect on behaviour, there is a need for a balanced approach (Maesschalck, 2004; Hoekstra & Kaptein, 2014; OECD, 2009).

Similar to publication V, the OECD (2009) integrity management framework, its four main functions and corresponding instruments are taken as the basis for comparing and integrating various approaches. According to OECD (2009, p. 9), integrity management “refers to the activities undertaken to stimulate and enforce integrity and prevent corruption and other integrity violations within a particular organisation” (see also Lawton et al., 2013; Tremblay et al., 2017). Integrity management consists of different instruments, processes, and structures aimed at four main functions: determining and defining, guiding, monitoring, and enforcing integrity (see table 2 for examples). Different aspects of integrity management are seen as supporting each other, for instance, the ethics code has to be supported by training, the development and implementation of integrity rules has to be integrated into institutional processes, etc. (OECD 2009, p. 11). Although there is considerable overlap between integrity (also ethics) management and anti-corruption policies, the latter tend to exclude topics like ethical leadership and

ethical performance (see, for example, Lawton et al., 2013; Heres & Lasthuizen 2014; Lawton & Paez 2015), while including the role of economic liberalisation, deregulation, tax simplifications, legal and judicial reforms, etc. (Persson, et al., 2010, p. 7; Fjeldstad & Isaksen 2008, pp. 9–14) in curbing corruption. Heywood et al. (2017, p. 4) also claim that they differ in their underlying intents, with the anti-corruption policies being motivated mainly by preventing certain activities (and are therefore mainly scandal-driven), while integrity management is aimed at promoting ethical behaviour. Additionally, as Lasthuizen et al. (2011, p. 389) point out, integrity violations⁶ go beyond corruption and can include, for example, misconduct during private time.

Table 2 Integrity management functions and instruments.

Function	Examples of Instruments
Defining and determining integrity Effective legal framework, codes of conduct in OECD (2000) Standards in OECD (2020) Integrity criterion in NIS (Transparency International 2012)	Rules on conflicts of interest, procedural restrictions, auxiliary activities, gifts and gratuities, declarations of economic interests, lobbying, codes of ethics, oaths of office. Also, rules on freedom of information, financing of political parties; bribery and trading influence, etc.
Guidance Capacity, leadership in OECD (2020) Socialisation mechanisms, tasks of the ethics coordination body in OECD (2000) Tasks of the anti-corruption agency in NIS (Transparency International 2012)	Various forms of training, methodological materials, core advisory functions, leadership
Monitoring Oversight, risk management in OECD (2020) Tasks of the ethics coordination body, active civil society in OECD (2000) Roles of the anti-corruption agency, ombudsman, national audit office, civil society in NIS (Transparency International 2012)	Surveys, integrity audits, whistle-blowing channels, oversight institutions (supreme audit institutions, ombudsmen, administrative courts)
Enforcement Enforcement, oversight in OECD (2020) Efficient accountability mechanisms in OECD (2000) Accountability criterion, tasks of the anti-corruption agency in NIS (Transparency International 2012)	Disciplinary and criminal procedures, cooperation structures, e-databases to manage cases

Sources: OECD 2009, OECD 2000, OECD 2020, TI 2012a

⁶ Lasthuizen et al. (2011, 389) bring out a typology of integrity violations, including bribery, favouritism, fraud, theft, gifts, sideline activities, misuse of authority, misuse and manipulation of information, indecent treatment of colleagues, citizens, and customers, waste and abuse of resources, and misconduct in private time.

3 Context and Integrity Management

3.1 Theoretical Concept of Context

One of the most interesting questions in public policy design and analysis is how policies are made and what determines the policy making process, implementation, and outcomes. A key concept in this endeavour is “context”. It is notable that the term “context” is extensively used but seldom defined (e.g., Sabatier, 2019; Pollitt & Bouckaert, 2017; Andrews, 2008; Pertiwi, 2018). The extensive study of context in public policy and management by Pollitt (2013) attempts to fill the gap by offering multiple approaches and definitions to the concept.

The term “context” is often used interchangeably with “environment”. Bovaird (2013, pp. 157–8) points out that both “context” and “environment” refer to “variables that are potentially relevant to the behaviour being studied”, but not specifically under study, linking the former term to political science and the latter to systems theory and organisational theory. However, Peters (2013, p. 101) uses the terms as synonyms, while Christensen and Lægread (2013, p. 131) define context as “circumstances, environment, background or settings which affect, constrain, specify, clarify the meaning of an event”, and thus seeing the environment as an element of context. The rather general definition of “circumstances surrounding an event” provided in the Oxford Concise Dictionary of Politics (McLean & McMillan 2009) seems to summarise the concept quite well.

In addition to the definition, there is also considerable debate concerning the “building blocks” of context, with various sources using terms such as “factors”, “features”, “forces”, “dimensions”, “constraints”, or “determinants”. For example, in organisational theory, Jones (2013, pp. 83–87) differentiates between specific and general environment; the latter being defined as “forces that shape the specific environment and affect the ability of all organisations in a particular environment”. These “forces” (Jones, 2013, pp. 85–87) or “sectors” (Hatch, 2018, pp. 72–75) include economic, legal, political, ethical, environmental, technological, demographic, cultural, and social factors. Bovaird (2013, p. 158) points out that these elements of the macro-environment have been summarised in the PESTEL analysis framework (political, economic, social, technological, ecological, legislative),

Various (public policy) theories focus on different factors, such as actors, institutions, the structure of political and administrative systems, ideas and policy advice, economy, or social cleavages to operationalise context. For example, theories of multi-level governance, punctuated equilibrium, and the advocacy coalition framework focus on different constellations of actors, their interactions, and how and why these constellations and interactions result in some policies remaining stable, while others change rapidly (Cairney, 2012). Institutionalism in its various streams identifies formal and informal institutions or rules of behaviour that influence how the policies are made (Cairney, 2012, p. 69). Structural explanations focus on how relatively fixed structures that are difficult to change (such as economy, government, demography, history-geography, etc.) influence the decisions of actors (Cairney, 2012, pp. 111–4).

In the context of comparative public administration, the terms “features” and “dimensions” have also been used. Pollitt and Bouckaert (2017, p. 47) argue that selecting the features to use for comparative purposes is one of the most debated questions. While they opt for state structure, nature of the executive, relationships between political executives and top civil servants, dominant administrative culture, and channels

of ideas for public management reforms, Kuhlmann and Wolmann (2014, pp. 11–16) rely on administrative culture (Continental European rule of law culture vs Anglo-Saxon public interest culture), the institutional dimension (federal, unitary-centralised, unitary-decentralised) and the historical dimension.

Instead of factors, others might use the term “constraints”. For example, Quiggin (2006) discusses economic constraints such as scarce resources, budget balance, and globalisation, while Immergut (2006) shows the constraints institutions create in the policy process and Bobrow (2006) presents constraints as resulting from social and cultural factors. Howlett (2019, p. 80) focuses on context-related “barriers and constraints” stemming from policy and governance styles, history, legacies, ideologies, path dependency, resource availability, etc. These constraints are seen as limiting policy choices, pushing them in a particular direction or impacting whether a policy issue remains on the agenda or not (Howlett, 2019, pp. 80, 101).

Still others use the term “determinants”. Howlett (2018, p. 23) claims that governance modes are “the first important overall determinant of policy design parameters in specific policy and issue areas” and discusses trust as a key determinant of policy effectiveness (2018, p. 114). Discussing policy styles, Knill and Tosun (2012, pp. 32–36) list potential determinants, differentiating between country-specific (e.g., socio-economic development, institutional arrangements, the relationship between state and society, economic situation, public opinion, coalition, etc.) and sector-specific determinants (e.g., policy paradigms, legacies and path dependencies, pressure of the problem, current experience, etc.).

Based on the aforementioned examples, context is commonly seen as a combination of different factors that provides a backdrop for policy decisions, their implementation and results, as well as comparisons of policies and administrations. These factors can be quite stable or at least they are expected to remain the same for the purposes of the research (Bovaird, 2013, p. 158; Proeller, 2013, p. 220), but not static (Pollitt & Bouckaert, 2017, p. 47). These factors are used as explanatory, control, or even dependent variables (Proeller, 2013, p. 221), for example. In corruption research, these factors have been used in all three ways (see **IV** for discussion). However, as is evident in integrity management research, the contextual factors are quite often used for description, e.g., in the NIS assessments.

Most commonly listed groups of factors with examples are summarised in Table 3.

Table 3 Examples of contextual factors.

Political system	Democracy and length of democratic tradition (Jetter et al. 2015; Moreno 2002; Kolstad & Wiig 2016) Political and civil liberties (Neudorfer 2015; Bacio-Terracino 2008) Freedom of press (Kalenborn & Lessmann 2013; Färdigh 2011; Flavin & Montgomery 2020) Unitary (centralised vs decentralised) vs federal system (Kuhlmann & Wollmann 2014) Political stability (Kaplan & Akçoraoğlu 2017; MacDonald & Majeed 2011; Fjelde & Hegre 2014)
Administrative system	Administrative culture (V; Pollitt and Bouckaert 2017) Quality of governance (Shen & Williamson 2005; Tavits 2007, Rauch & Evans 2000) Merit system (Dahlström et al 2012; Meyer-Sahling & Mikkelson 2016)
Socio-economic development	Wealth (GDP per capita) (Shen & Williamson 2005) Distribution of wealth (Policardo & Carrera 2018; Dincer & Gunalp 2012; Samadi & Farahmandpour 2013) Economic freedom (Samadi & Farahmandpour 2013)
Legal system	Rule of law (Shen & Williamson 2005) Common law vs Roman tradition (Kuhlmann & Wollmann 2014) Role of the judiciary in policy making (Albanese & Sorge 2012; Gotham 2020)
Socio-cultural factors	Trust (e.g Uslaner 2013; Richey 2010; Graeff & Swendsen 2013; Tavits 2010) Cleavages in society (ethnic, racial, religious, etc.) (Shadabi 2013; Shen & Williamson 2005) Value system (Sandholtz & Taagepera 2005; Huntington 2017)
Sector specific factors	Nature of the problem, policy paradigms, typical cleavages and conflict, pressure of the problem, current experience, historical legacies (Knill & Tosun 2012)

3.2 Integrity Management Frameworks and Context

Before becoming best practices, all integrity and anti-corruption policies have been designed for a specific organisation or a country with specific corruption risks and challenges, i.e., for a specific context or as Kaptein (2024, p. 1) emphasises integrity is about organisation's "singularity, individuality, originality". However, when these policies and instruments are uploaded into toolkits, the information on what makes a particular solution work in a specific (country or organisational) context tends to get lost in favour of generalised best practices. During the downloading process, it can be difficult to identify what is needed to make the best practices work in a new context. Therefore, a number of authors (Lawton et al. 2015; Hoekstra 2015; Lawton and Macaulay, 2015; Six and Lawton, 2013; Moilanen & Salminen 2006, p. 30) have emphasised the importance of context in integrity management, with Doig and Riley (1998, p. 62) arguing that corruption is deeply rooted in social, economic, and political contexts, and anti-corruption strategies should be tailored accordingly, discussing the importance of "political, economic, social, and cultural contexts and conditions". Demmke & Bossaert

(2004, pp. 69-71) emphasise several categories such as political context (including public trust, civil society, media freedom, depoliticised public administration etc.), judicial framework and private sector regulations. Thus, it is important to analyse how the selected integrity management frameworks consider context.

To a different extent, all four integrity management frameworks consider context, with the TI NIS having the most systematic and comprehensive approach. As the NIS methodology explains “since the national integrity system is deeply embedded in the country’s overall social, political, economic and cultural context” (TI, 2012a, p. 27), any assessment necessitates the analysis of four different contextual foundations: political-institutional, socio-political, socio-economic, and sociocultural (see table 4 for a detailed list). The assessment of these foundations relies on international data sources and indexes (Freedom House, WB governance indicators, WHO, World Values Survey, etc). As the institutional setting is often seen as a contextual element, another strength of the NIS approach lies in its inclusion of institutions, including political and non-political institutions from the public sector as well as civil society and the business sector. Last but not least, the NIS assessment methodology requires the analysis of a country’s corruption profile (TI, 2012a, pp. 27–28), including “tradition, culture or ethnic development (for example, patronage, clientelism, regional ethnicity), the nature of political structures, the nature of party politics, levels of pay, the propensity for corruption in the dominant business sectors, transit crime and drugs, money laundering”.

Table 4 Contextual foundations of the National Integrity System (Transparency International).

Foundation	Criteria/Elements (examples)
Political-institutional	Free and fair political competition for government offices among political parties and individuals Protection of civil rights Rule of law Trust in democratic institutions
Socio-political	Class, religious, ethnic, linguistic, or other divisions Social, ethnic, religious, or other conflicts Protection of minority rights Socially rooted party system Strength of civil society Patron-client relationships Political elite
Socio-economic	Wealth and division of wealth Exclusion due to poverty Coverage of basic necessities Social safety nets Infrastructure Business sector performance
Sociocultural	Support of prevailing ethics, norms, and values in society regarding integrity Trust Public-minded vs apathetic Personal integrity as a norm

Source: Transparency International 2012a, Annex 1.

Despite the detailed coverage of contextual factors, the NIS approach treats them as descriptive, not explanatory variables. The methodology does not require connecting the capacity of institutions or the existing integrity framework to contextual foundations. Although the NIS methodology is aimed at country level assessments, the use of international data sources may lend itself to comparative approach as well. Still, the comparative report of 25 European countries (TI 2012b) focuses only on the key strengths and weaknesses in the institutional structure, identifying main patterns (e.g., best and worst institutions, gaps and loopholes in legislation, etc.) but fails to consider the underlying causes and to draw respective conclusions. Although there is potential for pinpointing connections between the context and specific instruments, the framework has not been used in that way.

The ethics infrastructure approach (OECD, 2000) mostly employs the term “environment” when discussing the political, social, economic, or administrative context. However, contrary to the NIS methodology, the ethics infrastructure approach does not operationalise what is meant by political, social, economic, or administrative context. For example, the reports may refer to trends such as “globalisation, European integration, citizens’ demands for performance and accountability” or “rapidly changing socio-economic environment” (OECD, 2000, pp. 9–10), with no additional explanations. Administrative environment is mostly operationalised through the impact of administrative reforms, such as the use of private sector management methods to increase public sector efficiency and effectiveness, decentralisation of public service management, fragmentation of “traditional” public service values, increased risk of misconduct and changing boundaries between politics and strategic management (OECD, 2000, pp. 10, 27–29).

The integrity management framework approach (OECD, 2009) has its focus on the organisational level. It states that “integrity management instruments do not exist in a vacuum. They exist in a broader context with many other factors /.../ and actors that have an impact upon the organisational members’ integrity.” (OECD, 2009, p. 22). These actors and factors are a part of the organisation’s “outer context”. The description of these is divided into three main groups: firstly, factors in the economic context, political context, criminal context (all are limited to one example); secondly, integrity management instruments that have been adopted outside of the organisation and influence the organisational integrity management; and thirdly, actors that are listed by using the NIS framework (OECD, 2009, pp. 23–25). Again, similarly to the ethics infrastructure, the integrity management framework does not operationalise the factors – it simply gives a few examples and states that “these contextual factors are manifold and a general recommendation to take them all into consideration would not be very helpful for practitioners” (OECD, 2009, p. 23). However, it is pointed out that “if the integrity management framework for a particular organisation is appropriately designed and implemented, this will automatically imply that the most important contextual factors are taken into consideration”, for example, by using risk assessments or conflict of interest policies (OECD, 2009, p. 23). Still, by referring to institutions listed in the NIS, the ethics infrastructure establishes a basis for additional analysis of the “outer context”.

The OECD Public Integrity Handbook (2020) uses both terms, the “environment” and the “context”. The term “environment” is generally used in phrases, e.g., “work environment”, “open and safe [organisational] environment”, “control environment”, “risk environment”, occasionally also “public sector environment”. With the exception of the last example, the terms all refer to the internal context of an organisation. The term “context”, on the other hand, is mostly used to refer to the political, social, and legal

context, the “current context, performance and challenges within a specific country”, local and national contexts, the labour market. This is most clearly phrased while discussing risk assessments (similarly to the integrity management framework). It is stated that “the external context may include legal and policy frameworks, external stakeholders, and political, social and economic realities that underline specific types of integrity risks or response mechanisms” (OECD, 2020, p. 156). This approach is further specified by suggesting methods for evaluating the context, e.g., by using the PESTLE method (Political, Economic, Social, Technological, Legal and Environmental factors) (OECD, 2020, p. 156).

To conclude, although all three OECD frameworks recognise that „the integrity management instruments do not exist in a vacuum” (OECD, 2009, p. 22), they have adopted relatively different approaches to discussing context. First, the three frameworks use the terms “context” and “environment” interchangeably, with the 2009 and 2020 approaches mostly using the former, while the 2000 approach uses the latter. Second, the frameworks use these terms to refer to either the internal/organisational context or, similarly to the NIS framework, to the political, social, economic, or administrative context, but unlike the NIS framework, the OECD approaches do not operationalise them. This leads to vagueness in pointing out the influence of contextual factors. For example: “successful integrity measures /.../ take into account the wider public service environment” (OECD, 2000, p. 16), “specific measures in countries reflect national differences in priorities and social, administrative and political culture” (OECD, 2000, p. 11), “countries defined a wide variety of values which reflect their respective national, social, political and administrative environments” (OECD, 2000, p. 30), “the legal, political and public environments support effective civic space and thereby a robust civil society” (OECD, 2020, p. 230), “in line with their relevant political and legal context, each government (national and sub-national) and public organisation should have clear roles and responsibilities across the integrity system” (OECD, 2020, p. 30), etc. While correct, these statements do not provide sufficient information on how the context influences integrity management systems.

Unlike other frameworks, the Council of Europe Guidelines (2020) includes “conditions for an effective public ethics framework” (ch. B.1), such as respect for human rights and fundamental freedoms, respect for the rule of law, democratic norms, and the state’s “creation and maintenance” of a political and legal environment to facilitate the framework. These rather minimal requirements resemble the NIS framework not only in regard to the references to democracy, rule of law, etc., but also regarding the institutional capacity to uphold the integrity management policies.

A common characteristic of all these frameworks is their use of “context” as descriptive variable, not as an explanatory variable, which is common in corruption research. The contextual factors repeat (at least in very general terms) in integrity management frameworks and in research on the causes and effects of corruption, for example, general groups of economic, politico-administrative, and socio-cultural factors, each including several specific variables (for overviews see: Ata & Arvas, 2011; ElBahnasawy & Revier, 2012; Seldadyo & de Haan, 2006, Lambsdorff 2006). Therefore, while corruption research tries to explain which contextual factors might (not) contribute to higher levels of corruption, the integrity management framework does not link specific integrity management instruments or processes to the context. Consequently, for the discussion of context, the dissertation will draw mostly from the TI NIS methodology due to its well-structured and more comprehensive operationalisation of contextual factors.

3.3 Integrity Management Frameworks and the Local Context: The Gap

As discussed in the preceding sections, integrity management frameworks attempt to outline certain contextual characteristics, e.g., the TI NIS requires the analysis of political-institutional, socio-political, socio-economic, and sociocultural foundations, while the Council of Europe recommendation clearly states that democracy, rule of law, and human rights are prerequisites for an integrity management system to function at all; other frameworks pay attention to the importance of civil society (e.g., OECD, 2000 & 2020, TI NIS). Although these frameworks present a comprehensive overview of the integrity management instruments and functions, the foundations for these frameworks come from a rather specific set of countries as mentioned in the introduction. Therefore, as the contextual factors are to some extent stated, but mostly implied, it creates, as Drechsler (2013, p. 320) puts it in the context of public administration reform, a tacit assumption that there is just one good integrity management system that can and should be universally applied in different contexts. Although Maesschalck et al. (2024, p. 547) warn that these frameworks “are designed for organisations that function in a stable democratic environment” and cannot simply be implemented in a “deeply corrupt environment without serious adaptation”, they are still used in diametrically different contexts. Consequently, as these default terms and conditions are not met, countries whose political, legal, and administrative context is different, may fail to implement these seemingly universal policies.

This poses the question of which aspects of the integrity management system are more context specific and which are more universal/general. Drawing from Drechsler (2013, p. 324), some elements and solutions are “similar at all or most times” while others are different⁷. As it is not the aim of the thesis to focus on the global perspective in integrity management, following the discussion by Hooker (2009) the term “universal” in this context refers to the Western understanding of good governance as it is based on rules, not relationships. However, even within the Western context, there is significant variance in countries regarding their political, administrative, and legal systems, civil societies, relationships between the state and its citizens, cultural norms, size, etc. Public ethics scholarship suggests that there is considerable agreement when it comes to public values, such as legality, impartiality, integrity, transparency, objectivity, etc. (Christensen & Læg Reid, 2011a; Christensen & Læg Reid, 2011b; Cooper, 2004; DeForest Molina & McKeown, 2012, p. 381; Heintzman, 2007; Kernaghan, 2000; Kernaghan, 2003; Lewis, 2006; Moilanen & Salminen, 2006; Palidauskaite et al., 2010; Six & Huberts, 2008; van der Wal et al. 2008) and general principles such as the concept of conflict of interest and separation of public and private interests. When it comes to more specific strategies on how to combat corruption and promote ethical behaviour, there is some agreement on framework laws (e.g., which instruments might be needed), institutions (e.g., law enforcement) and functions (e.g., guidance), but not all of them (e.g., whether it is necessary to establish independent anti-corruption agencies or whether a regular law-enforcement system is sufficient for tackling corruption). However, it remains context-dependent how to formulate specific integrity management instruments and their implementation (e.g., gift policies, rules on auxiliary activities, or sanctions for bribery, etc.), who is responsible for which tasks, and what are the priorities of integrity and anti-corruption strategies.

⁷ See also Rayner et al. 2011 on different concepts of public service ethos.

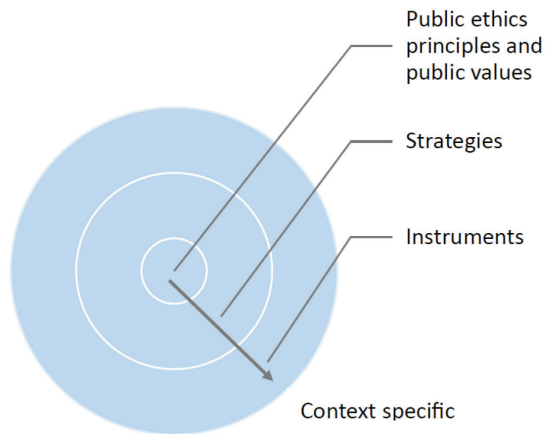


Figure 1 Context dependence of integrity management elements.

Integrity management toolkits seem to fall between the first two levels in their generalisability. They outline the values that should characterise ethical governance and suggest main instrument categories, functions, and processes. However, depending on the framework, they also prescribe norms based on which integrity management systems are evaluated, without providing any information on how to adapt the general instruments so that they would work in specific contexts. For example, the best practice of anti-corruption agencies (part of TI NIS) can have considerable variation in its functions, power, financing, position in the administrative structure, relationship to political leadership, etc. The same goes for any other integrity management instrument. Nonetheless, the frameworks do not suggest any factors that could or should be taken into account when designing them or what resources are needed to implement them.

The following chapters illustrate how designing and implementing integrity management instruments can vary in two contexts – post-communist states and small states.

4 Integrity Management in Post-Communist Countries

4.1 Background

The core inheritance of the communist era was common for all countries emerging from the influence of the Soviet Union: an undemocratic political system, planned economy, weak rule of law, low administrative capacity, and corruption. Despite the similar starting point, several authors have questioned whether post-communist countries could still be grouped together as reforms led them in different directions (Agh, 2003, p. 537), with some becoming members of the EU, while others retained authoritarian regimes (Staeher, 2006, p. 3; Douarin & Mickiewicz, 2022). Douarin and Mickiewicz (2022) claim that the transition is over as post-communist countries have become institutionally similar to others at their level of GDP, including (varying levels of) democratisation, a functioning market economy, and low inequality.

Still, based on various criteria, the Central and Eastern European countries that joined the EU in 2004–2007 not only differ from each other, but there are also obvious differences between the “new” (CEE countries) and “old” member-states (aka EU-15) of the European Union. In the context of the EU, the difference of GDP per capita between the poorest and richest CEE countries is about two-fold and remains below EU average. Eurostat data, taking into account the purchasing power standards, indicate that CEE countries range between 62% and 90% of the EU average. The World Bank Worldwide Governance Indicators⁸ show differences between old and new EU member states in five out of six indicators, with political stability and absence of violence being the most similar across Europe. In other categories (such as voice and accountability, government effectiveness, regulatory quality, rule of law, control of corruption), some countries consistently score on the same level as old EU member states (e.g., Baltic states, Czechia, Slovak Republic, Slovenia), while most of the CEE countries lag behind. In short, CEE countries tend to be poorer, have lower regulatory quality, government effectiveness, weaker rule of law and more corruption than older EU member states.

However, compared to the 1990s, the differences between CEE countries and old EU member states have become smaller. To overcome the aforementioned characteristics, most commonly called the legacy of the Soviet system (see, for example, Suwaj, 2012; Meyer-Sahling, 2009; Agh, 2003), CEE countries had to institute comprehensive political, administrative, economic, and social reforms. First, the reforms related to democratisation included transitioning from single-party systems to multi-party systems, reforms to the electoral systems and political institutions, local government, (see Kuhlmann & Wollmann, 2012 for a comparative perspective on decentralisation), establishing conditions for the functioning of civil society, adopting legislation on human rights, media freedom, etc. (Agh, 2003; Suwaj, 2012). These reforms often required constitutional as well as significant legislative changes and were supported by judicial (Dallara 2010; Kühn 2016) and administrative reforms (Meyer-Sahling 2004; Verheijen 2007; Nemeč 2008; Meyer-Sahling & Yesilcagıt 2011; Sarapuu 2011, 2012a; Drechsler & Randma-Liiv 2015, 2016; Randma-Liiv & Drechsler 2019; Randma-Liiv & Drechsler 2017). Second, reforms establishing new borders between the public, private and non-profit sectors, including economic reforms abandoning central planning of the economic system and reverting to market economy,

⁸ Voice and Accountability, Political Stability and Absence of Violence / Terrorism, Government Effectiveness, Regulatory Quality, Rule of Law, Control of Corruption (World Bank 2024).

privatisation, and restructuring and restricting government functions and services (Staehr, 2007; Suwaj, 2012).

As most countries in the region declared their intention to join the EU, the reforms were considerably influenced by the conditionality of EU accession, accompanying monitoring by and influence of various donors (Suwaj, 2012, 664–666). As early as 1993, the European Council had defined conditions for any potential member states (also known as the Copenhagen criteria)⁹, focusing on democracy, rule of law, human rights, functioning market economy, and ability to transpose and implement *acquis communautaire*. Therefore, political, legal, administrative, and market reforms were also crucial regarding the hope of joining the EU.

4.2 Corruption Profile

The issue of corruption has been a persistent element of post-communist political, economic, legislative, institutional, and social reforms. At the end of the 1990s, the World Bank claimed that “perceptions of corruption in the Commonwealth of Independent States (CIS) are among the highest of all countries included” and that Central and Eastern European Countries and the Baltic states, though in a better position, are still lagging considerably behind the OECD countries (World Bank, 2000, xiii). Corruption in post-communist countries ranged from low-level administrative corruption (e.g., bribery to low-level officials to bend the rules, using licencing power for extortion, deliberate over-regulation, etc.) and asset-stripping by officials (e.g., mismanagement of public resources, corrupt public procurement, nepotism, etc.) to state capture by corrupt networks (e.g., undermining elections, legislative and judicial processes, etc.) (Karklins 2002, p. 24; see also Holmes 2013, Zagainova 2007). The high level of corruption has been explained through the legacy¹⁰ of the Soviet system and the unstable environment created by the political, economic, and administrative reforms of the 1990s.

The legacy explanation focuses on the “rampant” corruption inherited from the Soviet era (Schmidt, 2007, p. 202) characterised by „a long-term departure from ethical standards of good governance, accountability, transparency and the steady movement toward private rent seeking in the bureaucracy, and continuing domination by the state in the economy so typical of the former command structures” (Kotchegura 2004, p. 327), with “traditions” of grand and petty corruption, clientelism, mistrust of state, and seeing “beating the system” as a legitimate (not a corrupt) activity (OSI, 2002, pp. 43–44). Several authors (Schmidt 2007; OSI, 2002, pp. 43–44; Kotchegura 2004, pp. 328) emphasise weak civil society and the weakness of democratic traditions as the underlying causes of corruption. Moller and Skaaning (2009 p. 726), however, disagree and claim that if control variables such as wealth, religion, and dependence on oil and gas

⁹ Copenhagen criteria include:

- 1) stable institutions guaranteeing democracy, the rule of law, human rights and respect for and protection of minorities;
- 2) a functioning market economy and the capacity to cope with competition and market forces in the EU;
- 3) the ability to take on and implement effectively the obligations of membership, including adherence to the aims of political, economic and monetary union.

¹⁰ Although most commonly legacy in this context refers to the communist legacy, some authors also refer further back in history, i.e. political and administrative systems predating II World War (e.g. Kotchegura 2004, Meyer-Sahling 2009).

production are used, the legacy of the communist rule has no “statistically significant effect on the level of corruption”.

Explanations that focus on the context of reforms attribute high levels of corruption to a decade of political and economic instability, simultaneous political and market reforms, lack of clear and stable rules, regulatory institutions, accountability and transparency mechanisms, “murky boundaries” between the state and economy, poor enforcement of laws, leading to private interests taking over governance processes, and the rise of oligarchs or even state capture in several countries (World Bank 2000, xiii; Kotchegura 2004, p. 328; OSI 2002, pp. 44, 60–67; Karklins 2002). As discussed in IV, these factors are frequently associated with higher levels of (perceived) corruption. Additionally, Moran (2001, p. 388) points out that the concurrent influx of foreign funds in the form of aid or investments also increased the susceptibility to fraud, embezzlement, and kickbacks. In short, the main causes of corruption have been seen in the combination of lack of competition and bureaucratic controls, with the reforms offering ample opportunities for corrupt activities (Møller & Skaaning 2009, p. 723; Karklins 2002; Pope 2000, p. 19).

Although the CEE as a region has become more stable over the past three decades, corruption still remains a serious issue in most countries. According to the latest Transparency International Corruption Perceptions Index 2023, Romania, Bulgaria, and Hungary remain the weakest scorers in the region, with Hungary and Poland seeing significant decline over the past decade, while others have seen improvement (e.g., Czechia, Latvia, Lithuania, Estonia) (see Figure 2) Still, even now, based on the TI CPI, the level of perceived corruption is significantly higher in CEE countries with a mean score of 54.6 compared to the EU average of 65 or 71 for old member states. TI also points out issues characteristic to the region, such as unsanctioned high-level corruption (Hungary), weakness of rule of law (Bulgaria), influence of oligarchs (Bulgaria), challenges to journalists reporting corruption (e.g., Hungary, Bulgaria, Poland), and insufficient independence of the judiciary (Poland, Lithuania, Slovakia) (Transparency International, 2024). In this context, Estonia stands out with its significantly better and improving score and position, surpassing several old EU member states.

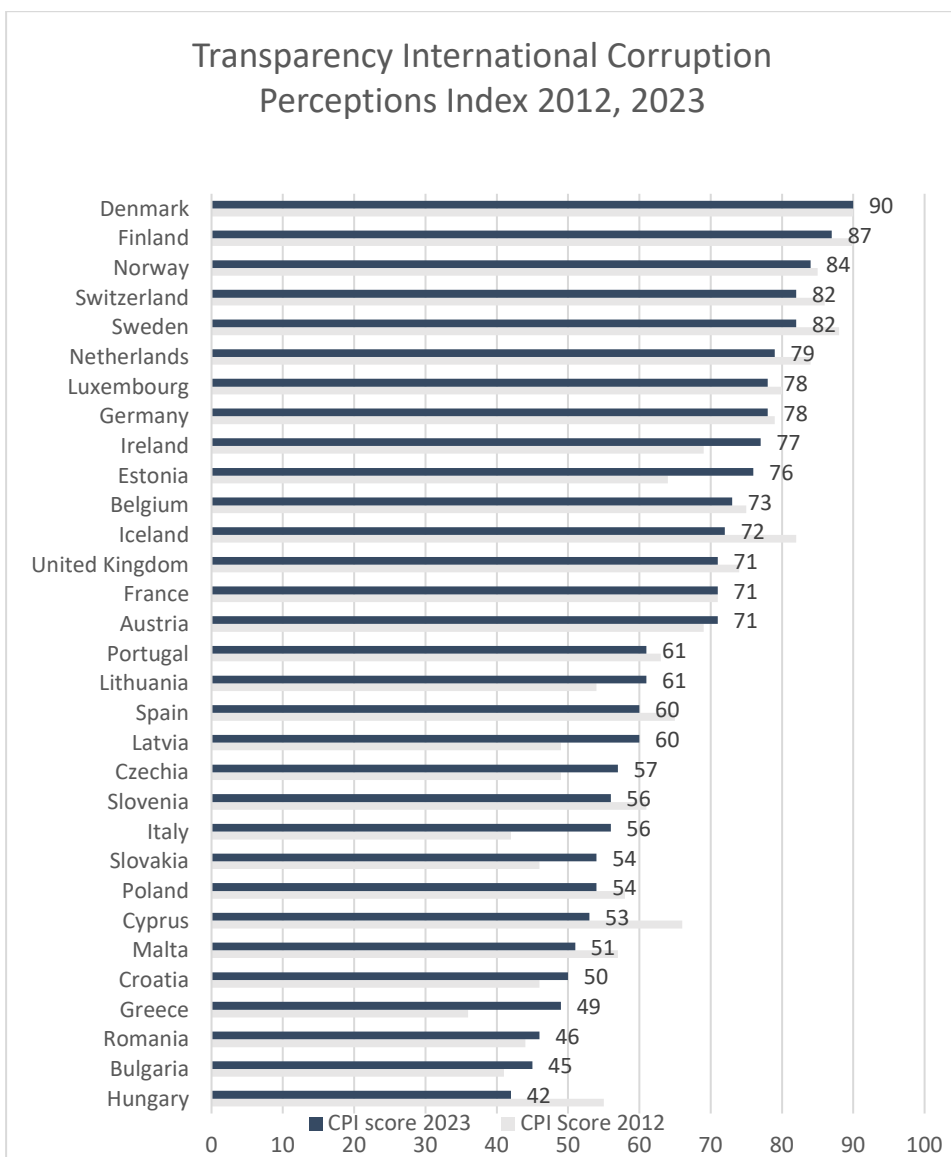


Figure 2 Transparency International: Corruption Perceptions Index 2012, 2023.

4.3 Integrity Management

As corruption has been recognised as one of the most pervasive issues in post-communist transformation, the question of how to curb it has received significant attention in various forms – from comparative surveys and National Integrity System assessments to single-country case studies. Although there are no comparative surveys predating EU accession, Schmidt (2007, p. 209) claims that the 1990s and early 2000s anti-corruption efforts in the CEE countries were first described by “euphoria”, i.e., a demand for policy advice, lack of success, and resulting scepticism, but gaining new momentum around 2005. Zaloznaya (2017, 12) attributes this lack of success to corruption tending to

increase after the start of democratisation reforms. The new momentum in integrity policies coincides with the accession to the EU and the rise of integrity management as a topic in OECD, TI and other international organisations.

Comparative surveys of EU member states by Demmke and Bossaert (2004), Moilanen and Salminen (2006), Demmke et al. 2007, Demmke and Moilanen (2011, 2012), Pantiru (2019), Demmke et al. (2020) and others analyse public service values, various integrity management and conflict of interest policies. Even the earliest surveys do not find any significant differences between the adopted integrity management instruments in old and new member states, referring to common beliefs that instruments such as punitive measures, codes of conduct, training, and political leadership are crucial in promoting ethical behaviour, with significant overlap in reported instruments and values (Demmke & Bossaert, 2004, pp. 73, 101; Moilanen & Salminen, 2006, pp. 17, 21; van der Wal et al. 2008; Pantiru, 2019).

Various analyses (e.g., Demmke et al., 2020; OSI, 2002; Demmke et al., 2007, Mungiu Pippidi, 2013; Tanasoiu & Racovita, 2012; Gadowska, 2010) associate this similarity in anti-corruption measures with EU accession and other external pressures by various donors, with international organisations like World Bank, IMF, Transparency International being active in policy advice (see Demmke et al., 2007, p. 33). The goal of joining the EU explains the impact of the EU anti-corruption framework, which, though “diffuse and non-binding” (OSI, 2002, pp. 34–35), has been used to assess the situation and progress of candidate states by regular reports during the accession period, taking into account the existence of anti-corruption policies, codes of conduct, training programmes, handling of corruption cases as well as the ratification of anti-corruption conventions, relying on such data sources as criminal statistics, public opinion surveys, reports, media, and regulatory deficiency (OSI, 2002, pp. 47–52; Demmke et al., 2020, p. 95). EU’s primary goal in promoting anti-corruption policies has been seen in ensuring effective and efficient implementation of the *acquis* (OECD 1999, p.5; OSI, 2002, p. 72), with “European Principles of Public Administration” emphasising several values that are not only relevant in the context of public administration reforms but also in integrity management, e.g. openness, transparency, accountability, and others (OECD 1999). In conjunction with aspirations to EU membership, Steves & Rousso (2003, p. 29) point out that the post-communist states have also had an indirect goal of improving the “country’s reputation in the international community and among foreign investors”.

This explanation coincides with a factor commonly used to analyse CEE reforms – external or environmental pressures (see, for example, Grabbe, 2003; Hardy, 2010; Vachudova, 2009; Nemeč, 2009; Meyer-Sahling 2009), especially the conditionality of EU accession. The Estonian case studies support this conclusion in several ways. Although the influence of EU anti-corruption initiatives has been less apparent over the last 30 years, the development of the Estonian integrity management system (**I, V**) has benefitted from international cooperation with the coordinating ministries seeing the Council of Europe / GRECO and OECD as the main partners in policy development and external evaluations, while Transparency International has been the main partner for civil society organisations. This trend is also evident in the influence of international organisations and foreign donors (e.g., OECD, EU) in the field of public administration development in general (**VI**). Even in more general terms, policy learning from other countries has been crucial in developing a public service code of ethics in the late 1990s (**I**) and is apparent in the design of anti-corruption acts and integrity training (**V**).

Although the surveys show that the main integrity management instruments are quite similar, some systematic differences between the old and new member states emerge as well. Some of the differences are present in only some of the surveys, e.g., the low salaries of civil servants being perceived as an obstacle to encouraging ethical behaviour (Demmke & Bossaert, 2004, p. 95) or new member states consistently rating the extent of unethical practices higher than old member states (Moilanen & Salminen, 2006, pp. 19–20), showing lower levels of ethical leadership (*ibid.*, p. 23) and claiming to have more public discussions on public service ethics (Demmke & Moilanen, 2012, p. 58). The main systematic difference that has been emphasised over the past two decades, however, is the over-reliance on compliance- or rules-based integrity management in the newer member states – there is a tendency to regulate more conflicts of interest than old member states and the existing regulations are stricter and more detailed (Demmke et al., 2020, pp. 62, 95; Demmke & Moilanen 2011, 60; Demmke et al., 2007, p. 52; OSI, 2002, p. 31; Stevulak & Brown, 2011), with anti-corruption strategies being more geared towards “repression and a criminal law-based approach” and low-level corruption (OSI, 2002, p. 70). However, these compliance-based instruments are not always deemed effective (OSI, 2002, p. 31; Meyer-Sahling & Mikkelsen, 2022, p. 145), with Demmke et al. (2007, p. 143) criticising their cost-effectiveness and Mungiu Pippidi (2013, p. 41) pointing out that “countries in the EU with special anticorruption agencies do not perform significantly better than countries which deal with corruption through their normal legal system”.

In that sense, Estonia’s early adoption of a value-based code of ethics (I) as well as a case-study based ethics training since 2004 (see also Pevkur 2008), thus rolling back the strictness of conflict-of-interest regulations and the adoption of good practice guidelines by the ethics council (V), goes against typical trends in the CEE region. The main result of diverging from these trends can be seen in the lower levels of corruption compared to other CEE countries. It is also notable that Estonian integrity management and anti-corruption policies have chosen to emulate, for example, the Nordic countries (V). These changes in the integrity management system development demonstrate that value-based instruments can successfully support the compliance-based instruments in a post-communist transformation (see also Pevkur 2007b). This conclusion is also supported by Meyer Sahling & Mikkelsen (2022, p. 158), who (based on a case study of Poland) conclude that “punitive and aspirational approaches support each other in the fight against corruption” and Batory (2012, p. 79) suggesting moving “away from the almost exclusive focus on sticks and also consider the potential use of carrots”.

The issue of the implementation of integrity management policies has been a pervasive topic in integrity management analyses in the CEE region. While some authors (e.g., Laštic, 2009; Staronova, 2009; Alistar & Nastase, 2009; Gadowska, 2010; Palidaukaite et al., 2010; Batory, 2012; Viorescu & Nemtoi, 2015; Krajewska & Makowski, 2017; Meyer Sahling & Mikkelsen, 2022) and surveys (e.g., Moilanen & Salminen, 2006; Demmke et al., 2007; NIS assessments, 2011–2012; Demmke et al., 2020) pay attention to whether the integrity management instruments are actually implemented or not, some surveys simply focus on the issue of their presence in legal acts (e.g., Demmke & Bossaert, 2004; Johannsen & Pedersen, 2011; Kostecki, 2021; Palidaukaite, 2006). As Steves & Rousso (2003, p. 6) point out, “the gaps between formal measures, government commitment and government capacity to implement these measures can be substantial. While the scores on these indicators are a useful, if crude, measure of the extent of explicit, formal anti-corruption measures, they should not be mistaken for indicators of the

government's actual commitment to these measures or their effective implementation". The issue of implementation has been deemed especially important in the context of EU accession and its influence on the capacity of new member states to adopt and implement the *acquis* (OSI, 2002, p. 57), with several authors concluding that EU accession has had a positive effect not only for the adoption of integrity management policies, but also for their implementation (Gadowska, 2010, p. 192; Demmke et al., 2020, p. 95).

The general consensus is that implementation has been rather uneven. Some authors (Meyer Sahling & Mikkelsen, 2022, p. 145; Stevulak & Brown, 2011; Demmke et al., 2007, p. 138) point out that compliance-based instruments have remained ineffective and counterproductive, suggesting that the CEE „countries would be well advised to focus on implementation and enforcement issues" (Demmke et al., 2007, p. 138), rather than adopting new policy instruments (see also Demmke & Henökl, 2007, p. 40). Based on the NIS reports of 25 European countries, TI concluded that eight CEE countries are exhibiting "mixed progress in the fight against corruption" (Transparency International 2012b, p. 13), with issues such as reoccurring scandals, low prosecution of corruption crimes, and adopting, but not implementing new legislation.

The main obstacles have been seen in the surrounding institutional and managerial environment, but also in historical legacies. For example, Kotchegura (2003, p. 331) points out that "developing management and policy making capacity, defining appropriate accountability systems, creating employment conditions capable of attracting highly qualified staff, streamlining relations between politicians and career civil servants, and reducing opportunities for corruption" should be the main focus for the CEE countries, while Mungiu Pippidi (2013, p. 47) as well as Krajewska and Makowski (2017, p. 337) suggest that to improve implementation, CEE countries should increase public audit capacity, judicial autonomy and accountability, continuous and systematic monitoring of implementation, and local civil society's capability for monitoring governance and controlling corruption (see also OSI, 2002, pp. 70–71). Demmke and Moilanen (2012, pp. 59–60) see lack of leadership, enforcement of codes and lack of integration with personnel policies (e.g., recruitment, promotion, etc.) as obstacles to implementation. Additionally, integrity management reforms are often seen in a symbiotic relationship with public management reforms in general, enhancing or impeding each other's success (e.g., OSI, 2002, pp. 41, 71–72; Kotchegura, 2004, p. 331; Demmke & Bossaert, 2004, p. 60; Palidauskaite et al., 2010; Pevkur 2007a). An earlier analysis by Demmke & Bossaert (2004, p. 7) emphasises the acceptance of ethics codes by the personnel, along with their continuous cultivation and maintenance. OSI (2002, p. 31) shows that to be effective, codes need to be designed and developed through "consultation with the officials to who they apply", while Batory (2012, p. 79) suggests the use of information campaigns. Discussing integrity training, Viorescu and Nemtoi (2015, p. 276) show that the strategies for training are ineffective without legally binding obligations, allocation of tasks between institutions, and (institutionally fragmented and insufficient) budget allocations. Gadowska (2010, p. 201) puts the blame for implementation issues on formal completion of tasks, lack of consistency, counterproductive legal amendments, and insufficient reporting. The influence of historical legacy has also been seen as influential, with Suwaj (2005, p. 318) emphasising low trust in the state, politicians, public administration, and judiciary, combined with a lack of accountability mechanisms and slowly changing habits. Batory (2012, p. 79) even concludes in her Hungarian case-study that if legislation is "completely out of sync with

social norms, policy reversal or termination should at least be considered as options. Laws that are patently ignored are worse than not having a law in the first place, because non-compliance undermines the credibility of the legal system as a whole.”

Estonia’s progress and situation with regard to implementation have been criticised as well. OSI (2002, p. 70), while commending Estonia’s “more comprehensive legislation” compared to other candidate countries, pointed out that “the extent to which the legislation has been implemented is questionable” and the NIS assessment (Saarniit et. al. 2012) showed several gaps in implementation and institutional responsibilities. Estonia presents several similar issues in implementation as other CEE states, e.g., early implementation gaps of the code of ethics (I, V), postponing the adoption and implementation of several integrity management instruments, e.g., lobbying rules, whistle-blower protection, and establishing the ethics council (V), sudden end of integrity training financing in 2023 (V), missing allocation of institutional responsibility in legislation (V), and lack of support by academic programmes in ethics training (III). However, compared to the other countries in the region, implementation of Estonia’s integrity management policies has also benefitted from various factors (V), e.g., clear orientation towards Western-European, especially Nordic value system, early cooperation with international organisations resulting in external policy evaluations, continuous development of the criminal investigation capacity of law enforcement agencies, monitoring and reporting the implementation of anti-corruption strategies, systematic ethics training, clear allocation of responsibility for coordination and policy development to the ministries of justice and finance and their cooperation with each other and other public institutions and civil society organisations, periodic surveys, etc. In short, Estonia’s integrity management system has institutionalised over the past three decades, minimising the implementation gaps.

Another question that has not received much attention in the integrity management scholarship covering CEE countries concerns the actors. As discussed above, the influence of external actors (e.g., international organisations) has been pointed out by illustrating their role in policy transfer and evaluations. The NIS assessments pay specific attention to various institutions and sectors and their role in integrity policies, with the 2012 comparative report (see: Transparency International 2012b) suggesting that even in countries that were seen as mostly success stories in the CEE context (Estonia, Lithuania, Poland, Slovenia), the role of civil society organisations and the business sector is rather weak in fighting against corruption. Similarly to the ethics infrastructure’s (OECD, 2000) emphasis on the role of politicians, various analyses have shown their crucial role in adopting integrity policies, with some showing lack of political will as an obstacle to policy development (OSI, 2002, p. 70), others pointing out how anti-corruption policies are used as a tool in political power-play (Tanasoiu & Racovita, 2012, p. 248). In case of Estonia, the role of politicians has varied significantly over time: they took a leading role in the 1990s, for example, in case of the first Anti-Corruption Act and the Public Service Code of Ethics (I, V), whereas after the EU accession, the main initiative for integrity management reforms has come from public administration and international organisations and conventions, while politicians take a more passive role in adopting new legislation, for example, in the case of lobby regulations and whistle-blower protection (V). However, the case of Estonia illustrates the importance of public administration and how integrity management policies are institutionalised, with a lack of institutional responsibility resulting in implementation gaps in the early 2000s (I), while recruiting and maintaining expertise leads to consistent strategies, analyses, policy development and

implementation, investigation of corruption crimes and participation in international anti-corruption activities (V). The importance of public administration in anti-corruption activities has also been pointed out by other authors (e.g., OSI, 2002, p. 70; Kotchegura, 2004, p. 333; Tanasoiu & Racovita, 2012, p. 248). Other actors that have not been discussed sufficiently in the CEE context are academic institutions. They play a role in preparing professionals for public sector jobs and can thus influence their ethical knowledge (III), offer expert opinions in the policy process (policy design as well as evaluation), and provide in-service training (VI).

To sum it up, the context of CEE post-communist transformation can be characterised by low stability resulting from political, administrative, economic, and social reforms, with high levels of corruption, and slowly decreasing differences with old EU member states with regard to economic development, and administrative and policy capacity¹¹. The need to deal with the pervasive issue of corruption in a highly unstable context, with inefficient administrative structure, lack of control systems and expertise in the field of integrity policies, has led to the adoption of highly similar, but stricter and more detailed integrity instruments. However, the implementation of these instruments tends to be inconsistent due to lack of expertise and institutionalisation, political power plays, lack of support by civil society organisations and political culture, low capacity of law enforcement, control and monitoring systems, and in some cases, issues with democratisation.

¹¹ Policy capacity is defined as “the ability to marshal the necessary resources to make intelligent collective choices about and set strategic directions for the allocation of scarce resources to public ends” (Painter & Pierre 2005, p. 2). Wu et al. (2018, p. 3) distinguish between three types of skills and competencies – analytical, operational and political – that are needed for performing policy functions.

5 Integrity Management in Small States

Small states scholarship has increased considerably in the past two decades, analysing the differences between small and large states in democratic governance (Corbett et al., 2021), public administration (Jugl, 2019; Sarapuu & Randma-Liiv, 2020), foreign policy (for example, chapters in Baldacchino & Wivel, 2020a), environmental governance (for example, chapters in Briguglio et al., 2021 and Briguglio, 2018), economic policy (Paulo et al., 2022; Walton & Dinnen, 2016), etc. However, as discussed in publication IV, the question of corruption has still received modest attention, with corruption studies largely disregarding population size as a variable and small state studies having sporadic interest in the topic. There are considerably fewer comparative analyses on integrity in small states, with only a few exceptions (e.g. Larmour & Barcham 2006; Larmour 2008, 2009; Corbett 2013a; 2013b; Walton & Dinnen 2019; Borlea et al. 2019; David-Barrett et al. 2020; Gascoigne 2023). Most of the publications are single case studies or case studies that focus on other topics but discuss corruption risks as an additional topic or a possible result of governance processes. The lack of comparative surveys is explained by the fact that small states vary considerably in their level of economic development, political and administrative systems, cultural traditions, geography, and location. Therefore, there are some common groups of countries clustered together based on their geographical location, such as the Pacific or Caribbean, or even groups like the Small Island Developing States (SIDS), but the group of “small states” as such is considerably larger and more diffuse.

5.1 Background and Corruption Profile

As discussed in detail in publication IV, the size of a state can be defined in various ways. Most commonly they are defined by the size of their population (Briguglio, 2018, pp. 1–2), however, there is no consistency in where to draw the line to define small countries. Briguglio (2018b, p. 2) claims 1.5 million to be a common threshold but demonstrates that the thresholds applied in research vary significantly and often without any justification. In addition to population as a criterion, definitions refer to power or capabilities or define size in relative terms (Baldacchino & Wivel, 2020b, pp. 4–6), allowing for a “flexible approach to the countries being studied” (Randma-Liiv & Sarapuu, 2019, p. 163). Small states are shown to have specific characteristics due to their small scale, which leads to similar issues in the economy (economies of scale, see, for example, Jugl, 2019) and the functioning of political and administrative systems (Baldacchino & Wivel, 2020b; Briguglio, 2018a; Briguglio et al., 2021) as well as a similar social context due to highly personalised relationships (Benedict, 1966; Bray & Packer, 1993; Lowenthal, 1987; Randma-Liiv, 2002).

These common issues are likely to have an impact on corruption risks (IV). On the one hand, small states tend to have higher economic freedom, openness to trade, reliance on import and external pressure to improve governance, democratic institutions, smaller scale of systems, higher transparency, higher accessibility, international donors, trust, social cohesion, and shared national identity – factors that have been associated with a lower level of (perceived) corruption. On the other hand, small markets, lack of economic diversification, limited domestic competition, high shares of foreign aid, high informality, “hollow” formal institutions, individual autonomy, small elites, weakness of media, administrative centralisation, multi-functionality, lack of expertise, small social field,

particularistic relations, and high probability of conflicts of interest are likely to increase corruption.

Some of these theoretical conclusions drawn in **IV** have been discussed previously in (mostly single-country) case studies by various authors. For example, Larmour (2008) as well as Larmour and Barcham (2006) discuss how cultural factors can contribute to corruption in small Pacific Island states, highlighting the importance of understanding cultural norms and practices in addressing corruption. Corbett (2013) and Corbett et al. (2021) focus on corruption stories from Samoa and the challenges related to political conduct and leadership succession in small Pacific Island states, indicating political governance as a corruption risk, while Staphenurst et al. (2018) compare parliamentary oversight in Trinidad & Tobago and Grenada, suggesting that a lack of effective oversight mechanisms may contribute to corruption risks. Everest-Phillips and Henry (2018) examine public administration in small states and how small size affects governance, indicating potential corruption risks within the public sector. Walton et al. (2022) claim that insufficient transparency in governance processes can contribute to corruption. Gascoigne (2023) discusses the negative consequences of the Westminster system and partisan media in small Caribbean states, highlighting how political systems and media biases can contribute to corruption risks. Fitzsimons (2009, 2007) discusses the relationship between corruption and economic reform in small states, suggesting that economic challenges may exacerbate corruption risks, while Walton and Dinnen (2016) claim that economic globalisation contributes to political corruption and organised crime in the Pacific. Engel et al. (2018) analyse corruption risks in Latin America and the Caribbean, indicating how international factors, such as investment arbitration, can impact corruption dynamics in small states. Hanich and Tsamenyi (2009) explore corruption in the fisheries management of the Pacific Islands, highlighting the specific risks associated with natural resource management. Taken as a whole, these studies illustrate a range of corruption risks and forms present in small states, influenced by cultural, political, economic, and international factors.

5.2 Integrity Management

Existing studies indicate that small states tend to be similar to Western states in terms of public service values. Several authors (Walton & Howes 2014; Larmour 2008; Engel et al. 2018) show a strong emphasis on integrity and transparency in public services to combat corruption, including initiatives to promote transparency in governance and decision-making processes and adherence to democratic principles, rule of law, and effective institutions (Corbett et al. 2021; Huberts 2011) as well as stressing accountability as a value (Walton & Hushang 2022; Everest-Phillips & Henry 2018). Similarly, the integrity management instruments discussed in various studies reflect a comprehensive approach, with Larmour and Barcham (2006, p. 173) concluding that “National Integrity Systems are crucial for combating corruption in small Pacific Island states”. These studies show that integrity management policies combine legal frameworks (Larmour & Barcham, 2006; Stanton 2024), international cooperation (Larmour 2007; Bishop & Cooper 2018), values-based approach to leadership strategies (Joseph 2015), democratic practices (Corbett 2013b, 2015), and governance reforms (e.g., institutional measures in Alleyne & Barrow-Giles 2021; anti-corruption measures in public service in Walton & Howes 2014; effects of decentralisation in Walton 2023; anti-corruption commissions in Rama & Lester 2019 and David-Barrett et al. 2020;); good governance initiatives in the Caribbean in Huberts, 2011, Curmi 2009 and McCourt 2008

etc.) to combat corruption. In addition, some of the publications also point out instruments that are not typically seen as part of integrity management but are shown to have an effect on the level of corruption in society, such as promoting civic nationalism (Walton 2021a), which is seen as a potential instrument of reducing corruption by fostering a sense of national identity and shared values. There are also peace-building initiatives that are aimed at conflict resolution, but through the interconnectedness of stability and governance, they are also integrated into anti-corruption efforts (Walton & Hushang 2022).

The question of implementation of integrity management instruments in small states has received significant attention as well as criticism for its ineffectiveness (Walton 2016a, p. 211; Hylton & Young 2007, p. 260). Several authors point out various challenges, such as limited resources (Walton & Hushang 2017, p. 60; Everest-Phillips & Henry 2018; Gascoigne 2023) and political will (Walton & Hushang 2017, p. 60; Walton & Hushang 2020, p. 187; Walton & Dinnen 2019, p. 418; Larmour 2012; Engel et al. 2018; Misra 2004; Bugeja 2015), with Corbett (2013b, p. 852) emphasising the importance of professionalisation of politicians in tackling corruption issues. A number of authors (Engel et al. 2018; Dix et al. 2012; Everest-Phillips & Henry, 2018) highlight the importance of institutional capacity in promoting anti-corruption efforts, suggesting that weak institutions may struggle to effectively implement anti-corruption policies. Small states' limited human and financial resources hinder effective implementation of anti-corruption policies and initiatives (Corbett 2013b; Everest-Phillips & Henry 2018), with fragmented governance structures making coordination and enforcement of anti-corruption measures challenging (Erk & Veenendaal 2014; Corbett et al. 2021). Staphenurst et al. (2018) add that a lack of effective oversight mechanisms could hinder the implementation of anti-corruption measures, while Walton and Hushang (2022) conclude that anti-corruption institutions may lack the capacity and authority to investigate and prosecute cases of corruption effectively. In addition, coordination among government agencies and stakeholders may be lacking, hindering effective anti-corruption policy implementation (Corbett et al., 2021). Moran (2001, pp. 385–386) as well as Walton and Dinnen (2019, p. 418) show the negative influence of organised crime and the vulnerability of small states to infiltration of criminal money that the national governance is not able to solve individually.

Larmour (2008) as well as Walton and Jackson (2020) discuss the influence of culture on corruption in the Pacific Islands, indicating that cultural norms and practices may hinder the effective implementation of anti-corruption policies, while Corbett (2013c), analysing the influence of religiosity on political conduct in the Pacific Islands, suggests that religious beliefs and practices could affect the implementation of anti-corruption measures. In addition to cultural factors, the weakness of civil society and challenges in mobilising citizens to actively participate in anti-corruption efforts due to such factors as lack of institutional trust may also hinder the effectiveness of anti-corruption policies (Walton & Peiffer, 2017; Walton & Hushang, 2022). The effectiveness of civil society has been hindered by a lack of resources (Walton & Hushang, 2017; Walton & Peiffer, 2017), challenges in facing the (political) elites (Walton & Hushang, 2022; Walton & Jones, 2017), constant undermining by corrupt networks and organised crime (Walton & Dinnen, 2019)

Small states are also characterised by the influence of international policy advice and the adoption of international standards and norms. Walton and Howes (2014, p. 22) mark the World Bank, EU, and UNDP as major sources of anti-corruption policy advice

(see also Walton 2017, p. 15; Walton & Jones 2017, p. 3), Larmour (2003, 2006) analyses Transparency International's role, with Australia playing a significant role in the Pacific region as well (Rama & Lester, 2019; Walton & Hushang, 2022). However, international policy advice has received significant criticism from various authors. Walton and Hushang (2020, p. 188) conclude that "donor-driven programs have had mixed success. They have been more successful in sectors like health and education than in law enforcement, where more investment is needed", with their later analysis criticising the overwhelming focus on the "law and order" type of approach in Solomon Islands (Walton & Hushang 2022, p. 39). Walton (2013a, p. 147) addresses the limitations of neoliberal approaches to anti-corruption policies in Papua New Guinea. Various studies also highlight the international "anti-corruption industry" focusing on local civil society and capacity building (Walton 2016b, p. 10; Walton & Peiffer 2017, p. 519). The main obstacle to successful implementation has been seen in the policy advice failing to take into account local context, especially local power dynamics and structures (Walton & Dinnen 2016, p. 15; Larmour 2007), leading to ongoing need for international assistance (David-Barrett et al. 2020).

In case of Pacific and Caribbean small (island) states, the aforementioned issues are often related to the colonial past. This legacy has been shown to influence small states in various ways, leaving behind institutional weaknesses in governance structures (Larmour, 2009; Fitzsimons, 2009; Gascoigne 2023), overly centralised structures that enable political interference (Corbett et al. 2021; Bugeja 2015) and therefore undermine anti-corruption efforts. As is evident in anti-corruption and integrity policies, some post-colonial states may become dependent on external assistance for anti-corruption measures, as a result of persisting influence by former colonial powers or international actors (Stanton 2024; Bishop & Cooper 2018) or due to the lack of local capacity (Curmi 2009). Colonial rule may also have influenced cultural norms and attitudes towards corruption, either by introducing corrupt practices or by creating a culture of acceptance (Rajagopal 1999). Although Estonia is a small country, it is rather different from the island states in the Pacific and Caribbean region. The most obvious differences include historical background (communist occupation vs colonialism) and lack of geographical isolation. However, Estonia shows clear small state characteristics in its public administration (Randma 2001; Sarapuu 2012b; Trei & Sarapuu 2021) as well as in integrity management. Estonian integrity management system has been impacted by the strong influence of international organisations and their policy advice, limited financial resources, the pressures to prioritise and to consolidate public functions, and a small number of experts in the field (III, V). However, reliance on informal communication and coordination as the core small state characteristic has been seen by stakeholders as one of the reasons for quicker and easier policy development in Estonia (V).

6 Discussion

The relevance of context is quite consistently included in the integrity management frameworks and academic literature, both in connection to the design and implementation of integrity management instruments in so far as pointing out that context should be taken into account. The scholarship is also quite rich in references to various contextual factors, such as democratic traditions, government structures, administrative culture, rule of law, civil society, media, social cleavages, economy etc. However, how these factors, especially their combinations influence the design and implementation of integrity management policies in various countries and how well international policies perform in different circumstances has remained without significant analysis. As policy instruments are context dependent, especially compared to public service values that tend to overlap, this dissertation was aimed at filling that gap.

Integrity management policies and their implementation in the context of post-communist transformation and small states raises several common themes and issues. Both groups of countries vary widely with regard to their perceived corruption level, economic development, democratisation, stability, political and administrative systems, etc. However, the main integrity management instruments applied are similar across the board, relying on shared public service values, conflict of interest regulations, institutional arrangements, etc. This trend towards common integrity management policies is easily explained by the impact of, and in case of small states sometimes even dependence on) the international policy community in the field of anti-corruption and integrity policies, with various organisations promoting the same solutions in different contexts, with the underlying assumption that the prescribed instruments and policies (of Western origin) are best practices for all countries and contexts.

Academic literature on integrity management and anti-corruption reforms discusses the impact of cultural norms and legacies in both contexts. In the context of post-communist transformation, the main issue seems to concern Soviet era legacies that needed to be overcome during the reform process. As the main aim of post-communist CEE countries was to join the EU, there was a prescribed idea of good governance (OECD 1999), including public service values and integrity instruments. Leaving the communist legacy behind and joining the EU not only as a member state but also “returning to Europe” in a cultural sense was a conscious choice, facilitated by (geographically, historically, culturally, and politically) close connections. However, in the context of mainly Pacific and Caribbean small states, the strong colonial legacy in combination with, the local cultural traditions and customs, including religious traditions, do not always mesh with international policy advice on anti-corruption and integrity policies, creating a clash between formal transfer of policies and institutions and their implementation (Corbett & Veenendaal 2016). In both cases, the process involves either changing one’s values based on the international/Western idea of best practices or adapting the best practices to suit the local context. The process is often characterised by resistance to change, either led by societal norms or different stakeholders whose position and interest may be negatively impacted by the planned changes.

However, this has created several problems with implementation, especially with the administrative and policy capacity needed. The cornerstones of a successful integrity management system, such as strong civil society, rule of law, democracy, specific understanding of the roles of different actors (especially politicians and public servants)

and social groups, may not be present in all countries attempting to implement the internationally acclaimed integrity policies. In the CEE and small state context, several administrative and policy capacity issues emerge. Limited expertise and experience, with limited analytical capacity, may lead to suboptimal choices in the policy learning and policy design process, resulting in copy-pasted policies that do not meet the country's institutional capacity or cultural norms. Limited financial and human resources, especially in combination with a weak rule of law and insufficient political support, may hinder the investigation and prosecution of corruption cases, and enforcement functions in general, thus resulting in ineffective policies and implementation gaps. The problem becomes even greater if law enforcement agencies are corrupt themselves. As the main source of integrity and anti-corruption policy expertise is located in the public sector, weak civil society organisations and investigative media are unable to perform their watchdog role. With the addition of low levels of trust in state institutions, it may lead to scepticism towards anti-corruption efforts or even hinder them. Coordination issues within the public sector as well as between public and private sectors and civil society combined with insufficient monitoring undermine the effectiveness of integrity policies. Last, but not least the role of politicians has received attention in both contexts, with the main concern being their opposition to the anti-corruption and integrity management efforts. Politicians' resistance against the needed reforms is especially crucial in case where the administrative capacity is low and the integrity management system is insufficiently institutionalised.

Therefore, in the context of international policy learning, it is not always about the best practice, but about the best practice for a specific country, with its individual corruption risks and institutional limitations. However, this assumes high policy capacity – the ability to decide in the context of limited resources what are the main or critical priorities and the best instruments to achieve them. As this policy capacity is not always present in the country intending to curb corruption, the responsibility quite often lies with the (international) policy consultant. In addition to corruption being regarded as a generic issue (Heeks & Mathisen 2012) and the aforementioned focus on Western models (Erk & Veenendaal 2014) leading to little variation in policy advice, various authors have pointed out that international policy consultants may lack a deep understanding of local contexts, including cultural, political, and historical factors, which can limit the effectiveness of their recommendations (Hendrix 2005), especially when it comes to long-term effects (McCourt 2008) and subsequent monitoring (Weeramantny & Mohan 2017). They are also often limited in their involvement and consultancy with the local community, resulting in limited capacity building and local ownership of proposed policies (Larmour 2007; Samarantunge & Wijewardena 2009) or conversely, excessive reliance on weak civil society organisations with limited administrative and policy capacity (Heeks & Mathisen 2012). However, as Mungiu-Pippidi (2013, pp. 45–6) puts it: “evidence shows again and again that control of corruption is a national equilibrium”. Thus, the integrity toolkits should pay more attention to context-specific factors, analysing the effectiveness of an instrument or its variations in a specific context, rather than just describing how it works, or even worse, simply describing the generic model.

This generic policy advice has led, for example, to the overuse of compliance-based approaches in post-communist CEE countries as well as small states, especially in the context of high levels of corruption. On the surface, it makes sense, as the adoption of regulative instruments combined with law enforcement can prove effective in curbing

corruption. However, it requires high administrative capacity, with sufficient human and financial resources – something that cannot be assumed in the context of either a small state or in the context of post-communist transformation. Beyond that, every integrity toolkit emphasises the importance of implementation, while failing to explain what to do, how to do it, what pitfalls to avoid and which processes are most effective in specific circumstances. In the context of post-communist transformation, the main issues are low administrative capacity, lack of expertise and experience, and weak coordination and control systems resulting in over-regulation and implementation gaps. In small states, weaker institutionalisation and more informal practices hinder the use of compliance-based approaches. This has led to a common theme in both post-communist transformation and small states' context: integrity management efforts are often seen as embedded into public management reforms, with the former's success depending on the latter.

Although compliance-based approaches seem more direct and effective, additional consideration should be given to integrity or values-based instruments, even in the case of high levels of corruption. Specific and strict sets of rules have their weaknesses, including equating ethical behaviour with legal behaviour, creating an atmosphere of distrust, motivating officials to find ways to circumvent the rules, becoming a window-dressing. Values-based instruments, however, (assuming sufficient training) may better enable adapting values to specific contexts and cases, taking into account, for example, the changing roles of different actors in a transformation context or multifunctional positions in a small state context. Although the process may be longer and less visible, the long-term impact on strengthening the public service ethos may contribute significantly to the compliance-based models.

Finally, in the context of post-communist transformation, many of the issues can be overcome with continuous reforms, e.g., democratisation, establishing market economy, rule of law, addressing lack of expertise and experience, etc. However, most of the characteristics of small states, e.g., small population size and all its resulting effects on social interaction, administrative performance, economic system, etc., are there to stay and cannot be changed even with the best policy advice. Therefore, policy design must consider the specific social, administrative, political, and economic context and adapt the policy instruments for that situation. Additionally, as the case of Estonia (among others) has demonstrated, it can be difficult to differentiate between the issues resulting from transformation processes and small state characteristics. As the forms of corruption, particularistic relationships, lack of expertise, etc. are common for both contexts, it may present a challenge to evaluate the extent to which the situation can be changed, and if not, how to adapt the policies.

To conclude, the scholarship on integrity management reforms in post-communist transformation and small states demonstrates that the generic international policy advice based on integrity management frameworks combined with low policy and administrative capacity, lack of support from politicians and civil society has led to compliance-based integrity management policies and implementation issues. This calls for further development of integrity management frameworks on how to apply them in various contexts.

7 Avenues for Further Research

The aim of this dissertation has been to contribute to integrity management scholarship theoretically as well as empirically and to illustrate how different contexts may lead to various corruption risks and influence policy choices. With the analysis of the case of Estonia, the thesis showed the opportunities and pitfalls of specific integrity management policies in a small post-communist country. The research questions were motivated by the generic nature of internationally used integrity management toolkits and their limitations in policy advice. Although the best practices recommended via toolkits can work, their implementation requires the existence of several underlying factors that are not always clearly stated, e.g., democracy, rule of law, high administrative and policy capacity, strong civil society, existence of Western values of good governance, etc. Therefore, relying on generic and often one-sided advice on integrity management instruments not only requires high policy capacity to make wise choices based on local conditions and the administrative capacity to implement them, but also often necessitates significant political and administrative reforms as well as changes in cultural norms and public values to support the chosen integrity management instruments.

The thesis leads to several new avenues for research. First, the issue of integrity policy advice and how it is adapted to different circumstances and contexts needs to be studied. On the one hand, it is an empirical issue concerning what is being done, e.g., how and to what extent the policy consultants tailor their advice to specific contexts, and how local experts adapt the toolkits. On the other hand, it is also an issue of professional ethics for policy consultants and whether their role is to simply “sell” the list of instruments or to advise on how to adapt them, given the corruption risks, administrative capacity, political and administrative system, and culture of the country.

Second, the division of roles between politicians and public administrators in the design of integrity policies would benefit from closer academic attention and would contribute to international knowledge on critical factors in the institutionalisation of integrity management policies. As to the role of politicians, their commitment and policy decisions are emphasised throughout the integrity management literature (in the context of small states as well as post-communist transformation), however, the role of public administration is somewhat assumed. As the dissection of both contexts has shown, the administrative capacity and expertise cannot be assumed and have proven to be among the core causes for implementation failures. The Estonian case indicates that public administration is crucial not only for providing expert information in the policy process and in implementing and evaluating the policies, but it often mediates and filters the pressures and initiatives from international organisations.

Third, the implementation gaps and their causes merit more attention, especially in connection to the development of administrative and policy capacity. As studies on small states and post-communist states have shown, low policy and administrative capacity is hindering evidence-based policy-making and effective implementation of integrity management instruments. Low policy capacity is mostly linked to the availability of expertise (and experience) in the field on integrity management, resulting in insufficient analysis of corruption risks and their causes and a lack of knowledge of integrity management instruments and how to adapt them. Administrative capacity typically concerns insufficient financial resources and personnel, as well as coordination and cooperation structures, and oversight and investigative functions. These issues lead not

only to potentially unsuitable choice of integrity management instruments, but also to implementation gaps.

Fourth, the balance between compliance- and values-based integrity management systems deserves more attention: the sequence of adopted instruments, their effectiveness, and use of values-based approach in the context of high level of corruption. As research on post-communist countries and small states has shown there is a tendency to adopt compliance-based integrity management instruments, which although logical in the context of high levels of corruption, requires high administrative capacity and is therefore prone to implementation failures and often a target of political power-play. Although Estonian integrity management system started with compliance-based instruments as well, integrity-based instruments were added quite early in the process. Therefore, it is worth examining how integrity-based instruments can benefit countries with high levels of corruption, especially in cases of differing cultural norms, and whether there is an optimal time to add integrity-based instruments in addition to the compliance-based ones.

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Acknowledgements

Completing this PhD thesis has been a journey filled with challenges, growth, and invaluable support from many individuals and institutions. I would like to express my sincere gratitude to all those who have contributed to this endeavour.

First and foremost, I am deeply grateful to my supervisors, Prof. Dr. Külli Sarapuu and Dr. Aive Pevkur, for their unwavering guidance and scholarly insights, as well as encouragement, kindness, and patience. As mentors, co-authors, and friends, they have been instrumental in shaping this thesis and my academic development through numerous meetings and discussions. Their two different scholarly perspectives – Prof. Dr. Sarapuu’s expertise on public administration, institutionalisation and small states, and Dr. Pevkur’s knowledge of integrity management and professional ethics – helped to balance the various subtopics in this dissertation. Prof. Dr. Sarapuu’s calm and steady presence and Dr. Pevkur’s passionate determination, combined with their dedication, wisdom, and sense of humour have pushed and guided me in my research, playing a pivotal role in my academic journey.

I would like to express my heartfelt appreciation for my teachers and colleagues from Ragnar Nurkse Department of Innovation and Governance at TalTech. It has been an honour to have had the opportunity to learn from Prof. Dr. Tiina Randma-Liiv and Prof. Dr. Wolfgang Drechsler since my undergraduate studies, and I am incredibly grateful for the knowledge and guidance they have provided me throughout my academic journey. I deeply appreciate their feedback and constructive criticism on the first version of this thesis in the pre-defence, as well as their scholarly advice during various discussions which has significantly enriched not only the quality of this thesis but also aided me in navigating academic life. Prof. Dr. Ringa Raudla’s support and encouragement as the head of the doctoral programme as well as her insightful questions about the early drafts of various publications have been instrumental in finishing my studies. I am sincerely grateful to Dr. Amirouche Moktefi for his generosity and his constructive and substantive comments, guiding me towards a new perspective, which facilitated going deeper in my research. The academic community at the Nurkse Department has fostered an intellectually stimulating environment that has profoundly influenced my academic and personal growth.

Over the course of my studies and research endeavours, I have benefitted from discussions and cooperation with numerous people. I am thankful to my co-author, Prof. Dr. Muiris MacCarthaigh, Queen’s University Belfast, for our collaboration on the article on administrative culture, allowing the introduction of a wider perspective of contextual factors into the thesis. The discussions at University of Tartu Centre for Ethics, led by Prof. Dr. Margit Sutrop sparked my deeper interest in ethics, while research projects in cooperation with Ministry of Finance and Korruptsioonivaba Eesti provided much needed empirical information for academic publications. During various meetings over the last decade and a half, Dr. Mari-Liis Sööt, Anneli Jõgi, Anna Laido, Airi Mikli, as well as my former colleagues from the Council of Ethics for Officials, have provided a lot of food for thought, allowing me to take a fresh look not only at anti-corruption and integrity policies, but also at what I thought I knew about public administration and policy in Estonia. I am grateful to the interviewees of various studies whose willingness to share their experiences and insights has been essential to the completion of this research. Their contributions have enriched the empirical findings and added depth to the analysis.

Last, but not least, I am grateful beyond words for the invaluable support of my family and friends whose unwavering encouragement, love, and understanding have sustained me throughout this challenging journey. Moreover, their sense of humour has injected levity into even the most stressful of situations; it has provided moments of rest and served as a solid foundation, keeping both my feet securely on the ground amidst the ivory tower of academic research. The time spent with them, whether it is chatting about how our day went, celebrating each other's birthdays, achievements, and new beginnings, travelling, discussing music, movies, and memes, or simply talking about life over the dinner-table has been the moral support and source of strength I needed.

Abstract

International Integrity Management Frameworks: Does One Size Fit All?

The interest in how to curb corruption and ensure the ethical behaviour of politicians and civil servants has increased considerably over the past three decades. The policies aimed at preventing corruption and unethical behaviour are often discussed under the terms integrity or ethics management, which refers to the “activities undertaken to stimulate and enforce integrity and prevent corruption and other integrity violations within a particular organisation” (OECD, 2009). The increasing interest is evident in the activities of various international organisations, rising number of academic publications, comparative surveys and assessments of integrity management and anti-corruption policies and institutions. As a result of this growing attention organisations such as OECD, Transparency International, and Council of Europe have designed their own integrity management frameworks (OECD’s ethics infrastructure (2000), integrity management framework (2009), and Public Integrity Handbook (2020), Transparency International’s National Integrity System and Council of Europe’s guidelines on public ethics (2020)), that are used for not only promoting integrity, but also for policy analysis, assessment, comparison, and recommendations. These frameworks, consisting of best practices of policy instruments, functions, processes, and institutions, from a specific set of countries: Western (i.e. predominantly European and Anglo-American) countries, that are democratic, mostly wealthy and politically stable, with relatively large populations and well-functioning administrative system and rule-of-law, strong civil society, and free media. However, often, though not exclusively, the same frameworks are used in countries that do not meet that description.

Therefore, the main aim of the dissertation is to analyse how context influences the design and implementation of integrity management instruments. The thesis focuses on two understudied contexts: post-communist transformation and small states. Although these two contexts present specific sets of combinations of political, administrative, cultural, and economic factors that influence not only the corruption risks and corruption profiles of the countries, but also how corruption might be prevented and ethical behaviour promoted, the existing academic research has not paid sufficient attention to integrity management in these understudied contexts. The goal of thesis is to analyse, how context is conceptualised in various integrity management frameworks, how post-communist and small states contexts shape the choice and implementation of integrity management instruments and how integrity management frameworks and resulting policy advice should take into account different contexts. The thesis is based on six original publications, using qualitative research methods, including document analysis, and interviews. Two of the publications are theoretical studies, while four are case studies various aspects integrity management system and surrounding factors in Estonia, a small post-communist country.

Although the five aforementioned integrity management frameworks that are studied in this thesis focus on slightly different elements in terms of integrity management functions, levels of analysis, and capacity of institutions, they are rather similar in their overall approach to integrity management instruments. With one exception (Transparency International’s Integrity Management System), they largely disregard the concept of context, i.e. various factors in the environment, that influence, constrain and explain the

choice and design of integrity management instruments and their implementation. Although there is considerable agreement between different countries when it comes to public service values, the more specific the instruments are, the more they are dependent on the context in which they are implemented. However, the frameworks simply conclude that context has to be taken into account, but do not specify how.

Post-communist transformation in the Central and Eastern Europe was characterised by extensive political, administrative, social, and economic reforms in 1990s. The instability of reforms combined with lack of control, accountability and transparency systems, poor enforcement of laws, and weak civil society created favourable conditions for corruption. Conditionality of the EU accession forced these countries to adopt various integrity instruments as part of their anti-corruption reforms. Due to high level of policy advice from various international organisations, with low level of experience and expertise in the respective countries, the integrity management instruments adopted in post-communist countries are quite similar to the ones used in the older EU member states. However, the integrity management instruments in post-communist countries tend to gravitate more towards the compliance-based end of the spectrum, with Estonia being a clear exception with the use of values- or integrity-based instruments. However, the compliance-based instruments require high level of administrative capacity – a clear weakness in post-communist countries, that results in significant implementation gaps. Therefore, to be effective, integrity management policies should be institutionalised at various levels in civil service and be supported by administrative reforms in general.

Although there are some overlaps between the characteristics of post-communist transforming countries and small states (e.g. lack of formal rules and institutions, lack of expertise), the latter present a different context due their small scale. Small states are shown to have special characteristics due to their small populations, leading to lacking economies of scale in the functioning of the economy, political and administrative systems as well as increased corruption risks as a result of highly personalised relationships. Similarly to post-communist countries, small states have also been open to international policy advice on integrity management, leading to the implementation of comparable integrity management tools. There are also considerable similarities between the two groups when it comes to the over-reliance on compliance-based integrity management instruments, low administrative capacity leading to ineffective implementation, and weak civil society.

The similarities in the choice of integrity management instruments in these two contexts can be explained by the significant role of international policy advice that provides universal recommendations regardless of the country context, with consultants often lacking deeper understanding of the local conditions. The lack of policy capacity in small states and post-communist countries is not able to balance the generic advice of international consultants, while the effective implementation of compliance-based instruments is hindered by low administrative capacity, insufficient financial and human resources as well as weak coordination and accountability systems.

Therefore, the international integrity management frameworks should provide more detailed examples of policy instruments, processes and institutions that take into account the corruption risks of various contexts, as well as analysing the policy capacity for choosing between different instruments, and administrative capacity that is needed to implement them. As the dominant advice seems to be to use compliance-based instruments, the use of integrity-based instruments should be given more consideration, even in the context of high level of corruption. Although issues related to democracy,

rule of law, lack of expertise, lack of civil society support and others have generally decreased in the process of post-communist transformation, the special traits of small states mostly cannot be overcome. Therefore, the integrity management frameworks should consider including advice on how to modify instruments so that they are suited to various contexts.

Lühikokkuvõte

Rahvusvahelised eetika juhtimise raamistikud: kas sama lahendus sobib kõigile?

Eetika juhtimise raamistikud defineerivad eetika juhtimist kui organisatsiooni tegevusi, mis on suunatud eetilise käitumise edendamiseks ja jõustamiseks ning korrupsiooni ja teiste eetikarikkumiste ennetamiseks (OECD, 2009). Viimase kolme aastakümne jooksul on huvi korrupsiooni tõkestamise ning poliitikute ja ametnike eetilise käitumise tagamise vastu märkimisväärselt kasvanud. Need trendid on märgatavad nii erinevate rahvusvaheliste organisatsioonide tegevuses, teaduspublikatsioonide ja võrdlevate uuringute mitmekesisuses kui ka (rahvusvahelises) eetika juhtimise ja korrupsioonivastaste poliitikate hindamistes. OECD, Transparency International ja Euroopa Nõukogu on loonud eetika juhtimise raamistikke (OECD's eetikataristu (2000), eetika juhtimise raamistik (2009), and Public Integrity Handbook (2020), Transparency International'i korrupsioonivastase võimekuse raamistik (2012), ja Euroopa Nõukogu avaliku eetika juhendmaterjal (2020)), mis on kasutusel mitte ainult eetilise käitumise edendamiseks ja korrupsiooni ennetamiseks, vaid ka poliitika analüüsiks ja hindamiseks, riikide võrdlemiseks ning soovitude tegemiseks. Raamistikud sisaldavad eetika juhtimise meetmete, funktsioonide, protsesside ja institutsioonide parimaid praktikaid, mis tuginevad enamasti teatud tunnustega riikide kogemusele. Need riigid on reeglina demokraatlikud lääne- (st peamiselt Euroopa ja angloameerika) riigid, mis on suhteliselt suure elanikkonnaga, valdavalt jõukad ja poliitiliselt stabiilsed ning hästi toimiva haldussüsteemi, õigusriigi, tugeva kodanikuühiskonna ja vaba meediaga. Samu raamistikke kasutatakse aga sageli selliste riikide hindamiseks, mis ei vasta ülaltoodud kirjeldusele. Sellest lähtuvalt on doktoritöö peamiseks eesmärgiks analüüsida, kuidas kontekst mõjutab eetika juhtimise süsteemides välja toodud poliitikavahendite valikut ja rakendamist.

Töö keskendub kontekstile, mida esindavad kaks gruppi väheuuritud riike: post-kommunistlikud Kesk- ja Ida-Euroopa riigid ning väikeriigid. Nende riikide spetsiifiline kombinatsioon poliitilise ja haldussüsteemi, kultuuri ning majandusega seonduvatest teguritest ei mõjuta pelgalt riikides esinevaid korrupsiooniriske, vaid ka seda, kuidas korrupsiooni ennetada ja eetilist käitumist edendada. Akadeemiline teadmine selles vallas on veel lünklik. Doktoritöös analüüsitakse, kuidas eetika juhtimise raamistikud käsitlevad konteksti, kuidas postkommunistlik ja väikeriikide kontekst mõjutab eetika juhtimise instrumentide valikut ja rakendamist ning kuidas peaksid raamistikud ja neist lähtuv poliitikate hindamine erinevaid kontekste arvesse võtma. Töö põhineb kuuel publikatsioonil. Kaks publikatsiooni on teoreetilised, käsitledes korrupsiooni avaldumise kontekstuaalseid faktoreid väikeriiki ning halduskultuuri. Neljas publikatsioonis analüüsitakse Eestit kui post-kommunistlikku väikeriiki, selle eetika juhtimise süsteemi elemente, arenguid ja neid mõjutavaid faktoreid.

Dokoritöös käsitletavad viis eetika juhtimise raamistikku keskenduvad erinevatele elementidele, nt eetika juhtimise süsteemi funktsioonidele, analüüsi tasanditele, institutsioonide võimekusele jne, samas on need üsna sarnased lähenemises eetika juhtimise instrumentidele. Väärrib märkimist, et erinevate riikide avalike teenistuste väärtuste kokkulangevus on märkimisväärne. Samas, mida konkreetsemad on poliitikainstrumendid, seda rohkem sõltuvad need kohalikust kontekstist, milles neid rakendatakse. Rahvusvaheliste organisatsioonide poolt väljapakutud eetika juhtimise

raamistikud jätavad sageli konteksti, st erinevaid keskkonnategurid, mis mõjutavad, piiravad ja selgitavad eetika juhtimise instrumentide valikut ja rakendamist, suuresti tähelepanuta. Raamistikud küll osutavad, et konteksti tuleb arvesse võtta, kuid jätavad täpsustamata kuidas.

Poliitiliste, avaliku halduse, sotsiaalsete ja majandusreformidega kaasnenud ebastabiilsust 1990-ndatel aastatel post-kommunistlikes Kesk- ja Ida-Euroopa riikides iseloomustasid kontrolli- ja vastutussüsteemide nõrkus, kehv haldussuutlikkus ning ja nõrk kodanikuühiskond. See lõi soodsad tingimused korruptsiooniks. Euroopa Liiduga ühinemisõuetega kaasnenud surve tõttu võtsid riigid osana korruptsioonivastastest reformidest vastu erinevaid eetika juhtimise meetmeid.

Eetika juhtimises saab poliitikate kujundamisel eristada väärtuspõhist ja reeglitepõhist lähenemist. Mitmete rahvusvaheliste organisatsioonide poliitikasoovituste tulemusel on post-kommunistlikes riikides ja vanades Euroopa Liidu liikmesriikides kasutatavad eetika juhtimise instrumendid omavahel väga sarnased, kuid post-kommunistlikud riigid kasutavad enam reeglitepõhist lähenemist. Eesti eetika juhtimise süsteem on selles kontekstis selgeks erandiks, kus väärtuspõhistel instrumentidel on suur roll. Reeglitepõhise süsteemi kasutamise peamiseks väljakutseks on tugineda kõrgele haldussuutlikkusele, mis on aga post-kommunistlike riikide haldussüsteemide nõrk koht. Seetõttu on oluline, et eetika juhtimise süsteemid oleks institutsionaliseeritud avaliku halduse erinevatel tasanditel ning leiaksid tuge ka avaliku halduse üldistest reformidest.

Post-kommunistlikel riikidel ja väikeriikidel on mitmeid sarnasusi (nt sarnased korruptsioonihud, korruptsiooniennetuseks vajalike formaalsete reeglite ja institutsioonide puudumine, ekspertteadmiste vähesus). Väikeriikide eritunnuseks on rahvaarv. Väikeriikide kogemus näitab, et väike elanikkond mõjutab majanduse, poliitilise ja haldussüsteemi toimimist ning loob kõrgendatud korruptsiooniriske tihedate isiklike suhete tõttu. Väikeriigid on olnud avatud rahvusvahelisele poliitikasoovitustele eetika juhtimise valdkonnas, mille tulemusel on väikeriikidele antud eetika juhtimise soovitused väga sarnased post-kommunistlikele riikidele ning kalduvad reeglitepõhise süsteemi poole. Madalast haldussuutlikkusest tingitud rakendusprobleeme süvendab ka kodanikuühiskonna toetuse puudumine.

Kahe erinevas kontekstis tekkinud sarnasused eetika juhtimise süsteemides on selgitatavad rahvusvaheliste poliitikasoovitustega, kus varieeruvus erinevate riikide vahel on väga väike. Ühest küljest on see tingitud sellest, et eetika juhtimise raamistikud ei arvesta erinevaid kontekste ja neist tulenevaid erinevusi korruptsiooniriskides, haldussuutlikkuses ja kultuuris. Teisalt on see aga tingitud asjaolust, et poliitika soovituste jagajatel puudub sageli sügavam arusaam kohalikust kontekstist. Kuna väikeriikides ja post-kommunistlikes riikides on sageli puudus vastavast kompetentsist ja kogemusest, siis on ka selle valdkonna poliitikavõimekus madal ning seetõttu ei suuda riik sisustada ja kohendada rahvusvaheliste konsultantide üldiseid nõuandeid, mis on sageli suunatud reeglitepõhise süsteemi kehtestamisele. Madala haldussuutlikkuse ebapiisavate finants- ja inimressursside ning nõrkade koordineerimis- ja vastutussüsteemide tõttu on aga reeglitepõhisele süsteemile iseloomulikke meetmete kasutamine raskendatud.

Seetõttu peaksid rahvusvahelised eetika juhtimise raamistikud (sh näited meetmetest, protsessidest ja institutsioonidest) ja neist lähtuvad poliitikasoovitused võtma senisest enam arvesse erinevatele riikidele iseloomulikke korruptsiooniriske, nende poliitikavõimekust erinevate meetmete kohandamisel ja rakendamiseks vajalikku haldusvõimekust. Kuigi domineerivaks poliitikasoovituseks näib olevat reeglitepõhisele

süsteemile iseloomulike meetmete kasutamine, tuleks enam analüüsida väärtuspõhise süsteemi meetmete kasutamist ning seda ka kõrge korrupsioonitasemega riikide kontekstis. Mitmed demokraatia, õigusriigi, ekspertteadmiste puudumise, kodanikuühiskonna toetuse puudumise ja muud post-kommunistlike reformidega seonduvad probleemid on ajas vähenenud ja väikeriikide väikesest rahvaarvust ning sellest tulenevatest eripäradest tingitud väljakutsed on lahendatavad. Eetika juhtimise raamistikud peaksid olema kontekstitundlikumad, kuidas kohandada vahendeid nii, et need sobiksid erinevat tüüpi riikidele

Appendix 1

Publication I

Saarniit, L. (2006). A Public Service Code of Ethics Applied in a Transitional Setting: The Case of Estonia. *Public Integrity*, 8 (1), 49–63. (ETIS 1.2)



A Public Service Code of Ethics Applied in a Transitional Setting

The Case of Estonia

LENO SAARNIIT

Abstract

This case study describes the application of the public service code of ethics adopted by Estonia, a country that shed communist rule in 1991. It demonstrates the problems challenging a public service in transition, such as the need to redefine the role of public service, coordination issues, enforcement problems and an implementation gap, and a legalistic approach to public administration. The code exemplifies Estonia's chaotic and inconsistent reform efforts but has nonetheless had a positive impact.

Public service codes of ethics are generally a phenomenon of the twentieth century, a period in which more and more attention began to be paid to the role of ethics codes in the fight against corruption (Bruce 1998, 411). Most authors seem to agree that codes will continue to be important in the future (Bowman 2000, 673). The increased interest in ethics code is a result of the declining trust in government brought on by perceptions of widespread wrongdoing (Kernaghan 1997a, 291; Thomas 1998, 166).

The topic of ethics codes raises several questions, not the least of which asks: What is a code of ethics? As Kernaghan (1980) points out, there is a continuum of approaches, ranging from the Ten Commandments (general principles and values) to the Justinian model (specific provisions for concrete cases). Another important question asks why ethics codes are adopted. Several researchers attribute code adoption to widespread corruption and scandal (e.g., Anechiarico and Jacobs 1996, xii; Dobel 1993, 158; Lewis 1993, 139) or to an apparent decline in public service values (Kamto 1997, 295).¹ Still another question seeks to identify the aims of codes of ethics. Lewis (1991, 143) suggests that high standards of behavior, public confidence in government, and assisting individual decision making are the realistic objectives aspired to in ethics codes (see also Plant 1994). A final question concerns

how the codes are applied. Some authors have written studies on specific cases, whereas others have cast doubt not only on the application process but also on the whole approach (e.g., Huddleston and Sands 1995; Kernaghan 1993, 1997a, 1997b).

Relatively little attention has been given to codes of ethics in the context of transitional countries (e.g., Palidaukaite 2003).

Over the past ten or fifteen years, thanks to the collapse of the Soviet Union, the Central and East European countries have been “reinventing” their political and economic systems, developing forms of political organization rooted in democracy, and creating economies based on market forces. This has led to the introduction of a completely different value system, one that brings with it new rights, responsibilities, obligations, and restrictions that apply across the entire society.

Over the past ten or fifteen years, thanks to the collapse of the Soviet Union, the Central and East European (CEE) countries have been “reinventing” their political and economic systems, developing forms of political organization rooted in democracy, and creating economies based on market forces (Kamto 1997, 296–297). This has led to the introduction of a completely different value system, one that brings with it new rights, responsibilities, obligations, and restrictions that apply across the entire society.

The role of civil servants is also undergoing a major change, because the task of modernizing public administration goes beyond the adoption of new legal rules. Under the Soviet *nomenklatura* system, public service was effectively thwarted from developing

into a real profession (Vanagunas 1999; Verheijen 1998). As a result, the public services in all the CEE countries have been forced to redefine their role in society, including their relationships to the political branches of government, the private sector, and civil society (Hesse 1998, 169–170). Because public administration was closely integrated with the Communist Party bureaucracy, redefining its role is difficult (United Nations 2000, 11–12; Verheijen 1999, 2–3; see also Verheijen and Dimitrova 1996). In addition, several values that are part of the public service ethos in democratic states, such as transparency and the rule of law, were completely missing from the Soviet bureaucracy (Wolf and Gürgen 2000).

Even more, the civil services in the CEE countries have had to deal with decreasing job security (Vanagunas 1999, 224–225; Verheijen and Dimitrova 1996, 209–210),² the negative heritage of the Soviet system resulting from public service being an instrument of oppression (Verheijen 1999, 2–4), frequent governmental changes, major corruption cases, and a lack of qualified employees (Vanagunas 1999, 229–230). All these features contribute to a negative citizen perception of the public service as corrupt and inefficient (Vanagunas 1999, 230). The reform context makes the adoption and application of ethics codes different from the situation in the Western democracies.

This article discusses the code of ethics adopted in Estonia. It begins with a brief overview of Estonia and its administrative context. This is followed by an analysis of the country’s public service code of ethics, examining the reasons for its adoption, its intended application mechanisms, its enforcement in practice, and the prob-

The author thanks the Center for Ethics, University of Tartu, whose Volkswagen Stiftung Scholarship made the completion of this article possible.

lems that have surfaced. The article concludes with a discussion of future possibilities for the code.

Estonia in Transition

Estonia, the northernmost of the ten new members of the European Union (EU), has a population of 1.4 million and a territory of 17,462 square miles. It is a parliamentary democracy, with the president as the head of state and the prime minister as the head of government. The parliament, known as the Riigikogu, is a unicameral legislative assembly composed of 101 members. The constitution was adopted in a referendum in 1992. Estonia has been a member of the United Nations since 1991. In 2004, it became a full member of the EU and NATO.

As part of the former Soviet Union, Estonia has had to develop its state structures nearly from scratch, because its brief period of independence between two world wars was not long enough for the development of governmental traditions or a distinctive political culture that could have “survived” Soviet rule.³ Since regaining its independence in 1991, Estonia has in part established and in part reformed its public administration. When the Public Service Act came into force in 1996, employees working in government agencies became public service officials. Although merit principles were introduced, candidates were not required to pass examinations or submit to other selection mechanisms. By introducing open competition, job security, evaluation, and career mechanisms, Estonia sought to establish a public service that would be able to meet the criteria set by international organizations, especially the preconditions for EU membership.⁴

Reform has not been easy, however. As Randma-Liiv points out, the development of Estonian public administration has been “neither rational nor consistent, as political will for structural administrative reforms has been deficient” (2001, 43). Several reform committees have been established, restructured, and dissolved, and thus there has been little or no consistency. The number of public servants has gradually increased, despite the fact that several governments declared a commitment to reducing it (Randma-Liiv 2001, 43).

Moreover, CEE reform needs to go beyond legal and structural changes to include a change in administrative culture. Taagepera (2002) argued that in the first years of administrative reform, the structural and legal changes did, in fact, entail a change in the administrative culture. According to data collected by the State Chancellery, in 2001, 54 percent of civil servants were less than forty years old, and 76 percent had worked in the public service less than ten years, which could mean a considerable change in the culture of public service. Still, the changes induced by the overhaul of structures and staff have not been sufficient. By the end of 1998, it was clear that new laws alone would not change the culture and values of Estonian public service (State Chancellery 2001, 43–44). Several different surveys, to be discussed below, showed the persistence of beliefs and behaviors not suitable for a democratic state.

Estonian Public Service Code of Ethics

The importance of public ethics issues has increased during the past seven years. Several professional associations (including the associations of judges, lawyers, journalists, doctors, and engineers) have adopted codes of ethics. Moreover, the adop-

tion of the Public Information Act (2000) considerably improved the means at the disposal of the media for performing its task as watchdog.⁵ On the one hand, this can be seen as a sign of the development of society as a whole. On the other hand, the adoption of codes may also reflect a clash between the “ought” and the “is.” Although international organizations tend to see Estonia as a positive example of a rapidly developing state, with a relatively low level of corruption,⁶ it displays behavioral patterns bearing telltale signs of the Soviet era⁷ (“Limiting Corruption” 2002).

Contrary to the usual finding in research on codes of ethics, the Estonian code was not adopted because of major scandals, widespread corruption, or the need to close loopholes in the law, but in the hope of building a completely new value system for evaluating the quality of public service.

The Public Service Code of Ethics (see p. 62) was adopted by the Riigikogu in 1999 as an appendix to the Public Service Act (1995). The preliminary decision to develop a code was made by the Ministerial Committee on Public Administration Reform. The committee designated the State Chancellery as the agency responsible for elaborating the code. The draft code was mainly written by one person, Ivar Tallo, within the Phare public administration development program.⁸ Different versions of the code were subsequently dis-

cussed in seminars on public administration reform, and many people contributed to it, among them officials, politicians, professors, and students (Riigikogu 1998). Despite this, the results of the “Limiting Corruption” survey (2002) showed that public servants believed that codes are not necessary and saw them as impositions by top management (or politicians) with public employees having no say in the process.

The parliamentary debate on the code took place mainly in the Riigikogu’s Legal Affairs Committee. The draft was not proposed to the Riigikogu as a separate amendment to the Public Service Act, but as part of a larger process of amending the Anti-Corruption Act. Presentations before the full house by the chair of the Legal Affairs Committee and the author of the code focused on the need for a code and outlined some of its principles (Riigikogu 1998).

The need for a code was explained by reference to the results of the “Public Officials” survey (1997) conducted among public servants working in central government agencies and local agencies. The study’s main conclusion stated that public officials did not understand the principles of a democratic political system in that they saw themselves as representing the public interest better than elected politicians and felt that politicians should be kept as far as possible from the actual tasks of government. These survey results demonstrated that there was need for a document that would lay out the values and principles of a democratic state. Confusion about the role of civil servants (a legacy of the Soviet system, as mentioned above) was very much evident. Contrary to the usual finding in research on codes of ethics, the Estonian code was not adopted because of major scandals, widespread corruption, or the need to close loopholes in the law, but in the hope of building a completely new value system for evaluating the quality of public service.

The second argument in favor of adopting a code was apparent in the answers to the question on how to improve the general work environment of the public sector; next to higher salaries, most respondents saw the development of a code as the best option for achieving this goal. Ivar Tallo interpreted this as showing the need for the public service to develop a professional identity (Riigikogu 1998). How-

ever, this factor should not be overemphasized. As the survey was not aimed at getting the officials' opinions on an eventual code, no inferences can be made as to why the code was deemed so important in improving the public service milieu.

The parliamentary debates centered on the aims of the code, including the ideals civil servants should strive for, the importance of stating the principles governing public service in a way easily accessible to civil servants and citizens (i.e., educating the public as one aim), and ways to improve decision making (and governance in general). It was emphasized that the expected changes, in turn, should increase trust in the government and the legitimacy of the state (Riigikogu 1998). Although all of these aims were voiced in the Riigikogu, they are not directly mentioned in the code. According to Palidaukaite (2003), the Estonian code of ethics is the only one in the CEE countries not to state its aims and goals.

The code's application process was not well planned. Since the code was envisaged as "soft" law, it did not include any enforcement mechanisms. The general opinion in the Riigikogu seemed to be that the code should not serve as grounds for disciplinary sanctions. Still, references to the code were included in the Public Service Act. These included the oath of office (§ 28)⁹, the duties of the civil servant (§ 59), and disciplinary offenses (§ 84, indirectly), which later created problems. Second, other forms of application mentioned in the Riigikogu included periodic evaluation of public servants and use of the code for in-service training. However, the debate shows very clearly that although several code goals and its use were laid out, the general approach seemed to be one of "let's see how the (political) situation develops" (Riigikogu 1998). Therefore, one can say that the adoption of an ethics code, and the way it was going to be used and applied in the future, was surrounded by considerable uncertainty.

Contents of the Code in Comparative Perspective

As was explained during the Riigikogu debates, the code is based on "widely recognized standards of conduct in the public service and laws of Estonia" (Riigikogu 1998). It was emphasized that comparative analysis of the principles of public ethics included in other codes of ethics shows great similarities, even if the administrative systems are different. Tallo (1999, 158) argues that these principles are a characteristic of a political system (democracy) and not of a particular state, that they are formulated in accordance with the needs of the given state, and thus that the application mechanisms of ethics codes differ between states.

The Estonian code lists twenty general principles dealing with the functioning of a democratic state. These include the principles governing the public service, and the work, as well as personal characteristics, of the public servant. In other words, the code describes what a good public service is and what good public servants should be like. Therefore, in Kernaghan's (1980) terms, it gravitates toward the Ten Commandments end of the continuum.

Following Tallo (1999), the Estonian code should be compared to the codes of other countries. Comparison of its contents to the value cluster in the OECD report (2000) shows great similarities to the most important values of public service in the member states of the Organization for Economic Cooperation and Development (see *Table 1 and the Appendix*). Based on a comparison of ethics codes adopted or drafted in the CEE countries, Palidaukaite (2003) concludes that rule of law, ser-

TABLE 1
Estonian Public Service Code of Ethics Compared to
Most Common Public Service Values as Assessed by OECD

<i>Value</i>	<i>Principle no.</i>
Impartiality (neutrality, objectivity)*	11, 12
Rule of law (legality)*	2, 5
Integrity (honesty)*	16
Transparency (openness)*	7, (9), 12
Efficiency*	14
Equality*	—
Responsibility (accountability)*	6, (12), (18)
Justice (fairness)*	—
Confidentiality	15
Professionalism	19
Service in the public interest	1, 4, (9), 10, (15)

Numbers in parentheses indicate principles where this value is of secondary importance.
Asterisks identify the values most commonly stated in a public service legal framework by OECD member states (OECD 2000, 31).

vice to the public, and impartiality are the values most often included in such codes, followed by competence and honesty.

However, since each state formulates principles in accordance with its own needs, two sets of differences emerge between the Estonian code and the OECD value cluster. First, the Estonian code does not mention the values of equality and justice, although they are included in the constitution (the preamble states that justice is one of the foundations of the Republic of Estonia, and equality is the central tenet of Article 12).

Second, the Estonian code includes several principles not found in other codes of ethics. For example, its third principle reads, "An official shall adhere, in his or her activities, to the legally expressed will of politicians who have received a mandate from the citizens." This principle can be seen as resulting directly from the reasons for adopting the code: the desire to eliminate confusion about the role of the public servant in a democratic state (as stated earlier, many officials did not understand the basic principles of a democratic public administration).

In addition, the Estonian code includes three other principles that are rarely in evidence in the codes of other countries or professional organizations: unpopular decisions (no. 8), subjecting departmental interests to public ones (no. 10), and suspicion of partiality (no. 13). Similar principles are also included in the ASPA Code of Ethics (American Society for Public Administration 1994, nos. 1.8, 4.1, and 3.3), which served as one of the chief models for the Estonian code. Analyzing the use of the code in public discussion (mainly in the media) of cases of corrupt or unethical behavior of public servants, it would seem that only the thirteenth principle has shown its importance in the Estonian context. The media have used it on several occasions to draw attention to activities of public servants that create a suspicion of conflict of interest (e.g., Putting 1999).

The other two principles (nos. 8 and 10) have not drawn attention, and therefore one may question whether they should have been included in the code. However, several

public servants (K. Kallas, personal communication, May 13, 2004; E. Keeman, personal communication, September 7, 2004; K. Roht, personal communication, December 20, 2003) have mentioned problems connected to the making of decisions that have an immediate effect on public well-being (e.g., closing schools, subsidizing certain medical drugs). Such decisions receive considerable media attention, and this makes it difficult for officials to decide, objectively and without bias, on the most effective, efficient, and economical course of action. As a result, their decisions are influenced by public opinion. Therefore, one may say that the eighth principle is also justified.

It is difficult to draw any major conclusions about the tenth principle. No research has yet been conducted on departmental interests within the Estonian public service and the conflicts liable to result from them. Estonia has been focusing almost exclusively on accession to the European Union, and perhaps as a result separate departmental interests have yet to emerge. However, there are already differences between the ministries in terms of their importance or resources, so it is likely that before long departmental interests will become more evident.

Despite the general similarity of the values embodied in the Estonian and Western codes, several ambiguities in the Estonian document need to be brought out. Contradictory principles and values may make it more difficult to understand the code. One question that arises concerns the goals of the public service. Is it to serve the people (no. 1), to adhere to the legally expressed will of elected politicians (no. 3), or to exercise authority in the public interest (no. 4)? If an official has to adhere to the legally expressed will of elected politicians (no. 3), why does he or she have to be prepared to make unpopular decisions (no. 8)? And what should be prioritized, broad citizen participation in the exercise of public authority (no. 9) or administrative efficiency (no. 14)?

The code tries to accommodate many important values and trends that characterize a democratic public service (classical public administration with its politics-administration dichotomy and New Public Management with its client-centered approach). In doing so it sows confusion and contradiction. In any event, the code bears the clear imprint of the context of Estonia's public service. The country's historical background has clearly influenced the amount of attention given to the public service acting in the public interest and to why certain principles are included.

Enforcement Issues and Problems

The main question about the application of a code pertains to how and when it should be used. Parliament decided that the code should be primarily a set of guidelines and not of grounds for disciplinary sanctions. Its suggested spheres of application were in the oath of office taken by officials as well as in evaluations of, and discussions on, public service. Although the code was adopted and the aforementioned possible uses were noted, code application was never systematically discussed. The questions of "how" and "who" remained unanswered, and in consequence the application of the code has been chaotic.

A reference to the code was included in the oath of office, and this is the code's main application mechanism. With only a few exceptions (e.g., the Ministry of Education and Research, the State Audit Office), information obtained in 2002 from personnel managers in government agencies shows that the use of the code con-

cludes with having new employees sign the oath of office.¹⁰ Therefore, it is doubtful whether the code really serves as a socialization mechanism for new civil servants.¹¹ There is no coordination on using the code in evaluations either. The documents concerning evaluation adopted in 1999 make no reference to the ethics code (Eesti Haldusjuhtimise Instituut 1999a).

One purpose of the code was to familiarize public servants, and the general public as well, with the new public service values. It was introduced with articles in major daily newspapers (e.g., Paet, 1999; Piirsalu, 1998) and in a law review article (Tallo 1999). However, there has been neither a systematic campaign to familiarize the public with the code nor any targeted campaigns (e.g., for journalists). The impact of this problem is already visible. The media rarely use the ethics code in reporting allegedly corrupt or unethical behavior. Therefore, it is highly doubtful whether awareness of the code is sufficient for it to be used as the basis of judging the performance of officials.

Among civil servants, however, discussions of the code have been rather frequent. The code values have also found their way into several other documents. Thus, the cabinet's Program on Administrative Reform ("Vabariigi valitsuse haldusreformi program," adopted in 2000, now discontinued) focused on citizen-oriented public service, which corresponds to the values of involving the public—democracy and transparency. The same similarity in values is apparent in the documents concerning evaluation of civil servants. Although the values in question are mentioned, they are not linked to the ethics code as such. That is, they are recognized in the context of public service development, but not as resulting from the code. These documents express the general aim of the public service code of ethics—a good public administration—yet the code itself is not cited. On the one hand, this can be seen as a positive sign that the meaning and aims of the code of ethics have found a place in other public service documents. On the other hand, it is unfortunate that no reference to the code is made.

Clearer signs of development can be noticed in the way the code is used in the public service. For instance, the annual public service conferences (which focus on different general topics) are now giving more attention to ethics. In 1999, although the topic was the change in public servants' roles, the question of ethics was barely mentioned—only one of the thirteen presentations referred to the need for an ethical public service and public service culture (Eesti Haldusjuhtimise Instituut 1999b, 16). In 2002, however, the main question concerned the type of public official Estonia needs. This time the discussion did not focus on technical knowledge. One of the main discussion panels dealt with the topic of the good public official and public service ethics (State Chancellery 2002). Subsequent conferences again ignored the ethics question. The conference in 2003 focused on the international aspect of the work of public servants, and the one in 2004 emphasized strategic management, but no presentation dealt with ethics issues (State Chancellery 2003, 2004).

Based on the preceding analysis, there are several problems in the application of the code, some of which exemplify the transition problems in the CEE countries. First, coordination was never discussed. Who should take responsibility for applying the code, who should coordinate efforts to use it in evaluation or training, and how to use it in evaluating specific cases—these are but a few of the questions that remained unanswered. This problem reflects the overall lack of coordination mechanisms in the CEE countries. As several authors have pointed out, under the commu-

nist regime the coordination function was performed by the Communist Party, and the removal of the party from state structures has created a vacuum in horizontal coordination (see Randma-Liiv 2005; Verheijen 1998).

Second, as the code and its application began to receive more attention from the State Chancellery in 2003,¹² there has been an obvious implementation gap. The discrepancy between legal norms and ability to enforce and implement them (SIGMA, 1998, 5) is a far-reaching problem in the

There are several problems in the application of the code, some of which exemplify the transition problems in the CEE countries.

CEE countries (Jabes 2000; Randma-Liiv 2005; Verheijen 1998). One reason for the gap is that it is easier to enact laws than to build effective implementation mechanisms (SIGMA, 1998, 6). This is apparent in the case of Estonia. To enable effective implementation, the code should have been “translated” into more specific instructions, manuals, and practical examples, something that has not been done.

Third, the application of the code is another example of Estonia’s legalistic approach to public administration. Although more attention has been given to managerial issues (Randma-Liiv 2005), the general attitude is quite legalistic. As mentioned, the intention was to make the ethics code into a general document of guidance, a soft law with no enforcement mechanisms. Although such mechanisms are absent from the code, they do exist in the Public Service Act, which cites the code as part of civil servants’ duties and makes dismissal a possible disciplinary sanction. A decision of the Supreme Court in 2001 (case no. 3-3-1-13-01) enforces this interpretation even further by stating that the code of ethics constitutes a list of duties for civil servants. In short, over time the code has obtained a legal status that, although unintended, makes it equal to any law. The consequences of its new status are already evident. Several cases, including a dismissal citing violation of the code, have reached the courts (see, for instance, the 2002 Supreme Court decision in case no. 3-3-1-4-02).

Future Possibilities

Despite the obvious problems related to enforcement and change of legal status, the code has become increasingly salient. Questions of ethics in public service and politics are debated more often than ever before. The new anticorruption strategy adopted by the cabinet in 2004 focuses on, among other things, the question of ethics. The measures aimed at reducing corruption include the establishment of an ethics council at the State Chancellery, providing advice and in-service training on ethics matters, and helping other government institutions to draw up their own codes.

Although the measures concerning public service ethics and ethics code application mechanisms are promising, there still remains the question of whether the anticorruption strategy will be fully implemented. The present governing coalition, which has been in power since March 2003, seems to be committed to ethics and the fight against corruption, but there is no certainty as to its tenure in office.¹³ Estonian governments have dealt with corruption issues before, but most of their strategic plans have remained paper tigers and have never been implemented. A few changes, however, deserve to be noted. First, the State Chancellery is now more interested in the topic because of its functions related to coordinating in-service training and evaluation of senior civil servants. The head of the State Chancellery is a civil service

appointee, and this provides an element of permanence that may help in the implementation of an action program. Nonetheless, much continues to depend on the budget, which is determined by the Riigikogu. Second, the 2004 changes in the Legal Chancellor's Act (1999) promise that more attention will be given to the concept of good administrative practices and issues of maladministration.¹⁴

Conclusion

The purpose of this analysis was to shed light on the way a country making the transition from a communist regime to a democratic state has dealt with the ethics issues that arise in government service. Confusion in the Estonian public service about its role and guiding principles led to the adoption of the public service code of ethics in 1999. Since then, however, little has been done to apply the code. The debates on this issue in the Riigikogu are best summed up as "let's wait and see." Several possible enforcement mechanisms have been suggested, but the question of enforcement has never been considered systematically. No government department has been directly charged with responsibility for applying the code. With application left to the discretion of various agencies and even individual officials, public discussion has been vestigial, although the code has received more attention from civil servants. So far, the only functioning application mechanism is the reference to the code in the oath of office. Although the inclusion of similar values in administrative documents indicates that the culture is changing, this cannot be attributed solely to the existence of the code. It seems instead to be the result of the stabilization of societal culture.

The application of the code has raised other issues that have received more attention in the context of the transition of the CEE countries. The question of redefining the role of the civil servant, discussed by several authors, is clearly visible in the Estonian case. The coordination problems and implementation gaps characteristic of CEE countries are also evident. The legalistic approach to public administration has transformed the code of ethics into a law, something not intended during the adoption process in the Riigikogu.

In conclusion, the code remains little more than another of Estonia's chaotic and inconsistent public service reform efforts. However, it has enjoyed a certain limited impact and holds out promising possibilities for the future.

NOTES

1. This holds for France, where officials have always been seen as carriers of a certain outlook and ethic, although this began to weaken in the early 1990s (Jean-Pierre 1997, 566). The same tendency can be seen in Britain, where the first report of the Committee on Standards of Public Life stated that although it cannot be said "conclusively that standards of behavior in public life have declined . . . people in public life are no longer sure . . . where the boundaries of acceptable conduct lie" (Committee on Standards of Public Life 1995).

2. Although Vanagunas (1999, 224–225) and Verheijen and Dimitrova (1996, 209–210) refer to a decrease in the number of civil servants, a recent study by Drechsler (2003) shows that the size of the public service has increased in eight CEE countries (the exception is East Germany).

3. Some of these organizations existed during the interwar period of independence (e.g., the Legal Chancellor's Office and the State Audit Office) and were restored in the 1990s.

4. In 1993, the EU decided that CEE states that wanted to become members would have to fulfill three criteria (known as the Copenhagen criteria): democracy and the rule of law, respect for human rights and protection of minorities, the existence of a functioning market economy coupled with the capacity to withstand the pressure of operating inside the EU internal market (European Union 1993).

5. Tammerk (2001) argues that although investigative journalism developed rapidly after the adoption of the Public Information Act, there are still several problems, including the difference between the “media” and “legal” languages, the media’s independence on the county and local levels, the availability of sources (Estonia is rather small, so personal connections tend to play an important role, especially on the subnational level), and the media’s professionalism in general.

6. According to the Transparency International corruption perception index for 1998–2003, Estonia has always been one of the highest-rated of the CEE states, with an index ranging from 5.5 to 5.7 (the highest index of 10 points refers to the least corrupt country). In the 2004 index, Estonia ranked thirty-first of 145 states. This shows that it is perceived as less corrupt than such “old” EU member-states as Greece and Italy (Transparency International 2004).

7. For instance, giving a small gift to a doctor to induce better treatment is not seen as corruption by 60 percent of the respondents of the “Corruption in Estonia” survey (2002).

8. The Phare program is one of the three preaccession instruments financed by the EU to assist CEE applicant countries in their preparations for joining the union. One of its main aims is to strengthen public administrations and institutions to function effectively inside the EU.

9. The oath of office is as follows: “I swear to be faithful to the constitutional order of Estonia and to perform in a conscientious and accurate manner the functions which the office entrusted to me requires. I am aware that the law prescribes liability for a breach of duties or public service code of ethics” (Public Service Act, § 28).

10. M. Aavisto, head of Personnel and Training Bureau, Ministry of Social Affairs (November 4, 2002), A. Alakivi, head of Personnel Service, State Audit Office (November 13, 2002), L. Kasper, head of Personnel Department, Ministry of Economic Affairs and Communications (November 4, 2002), Ö. Krevald, head of Personnel Bureau, Ministry of the Environment (November 4, 2002), L. Muru, head of Personnel Service, Ministry of Education (November 18, 2002).

11. New civil servants are a very important target group, because personnel turnover in Estonian public administration (though it slowed down at the end of the 1990s) has been on the order of 10–20 percent per year since 1997 (Randma-Liiv 2005).

12. The State Chancellery, a governmental institution serving the cabinet, is responsible for the development of the public administration and for in-service training of officials.

13. The coalition government that adopted the anticorruption strategy stepped down on March 24, 2005. The new coalition that entered the office on April 13, 2005, does not see corruption and ethics issues as a priority.

14. The legal chancellor evaluates the constitutionality of legal acts and also functions as an ombudsman.

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Appendix: Estonia's Public Service Code of Ethics

1. An official is a citizen in the service of the people.
2. The activities of an official shall be based on respect for the Constitution of the Republic of Estonia provided for in the oath of office.
3. An official shall adhere, in his or her activities, to the legally expressed will of politicians who have received a mandate from the citizens.
4. Public authority shall be exercised solely in the public interest.
5. Public authority shall always be exercised pursuant to law.
6. The exercise of public authority shall always involve liability.
7. The exercise of public authority is, as a rule, a public activity.
8. An official shall be prepared to make unpopular decisions in the public interest.
9. A person exercising public authority shall endeavor to achieve as broad participation of citizens in the exercise of authority as possible.
10. An official shall always, in his or her activities, subject departmental interests to public interest.
11. An official shall be politically impartial in his or her activities.
12. An official shall make decisions based on public and generally understandable criteria.

13. An official shall avoid creating a situation which arouses or may arouse suspicion with regard to his or her impartiality or objectivity in considering matters under suspicion.
14. An official shall treat property entrusted to him or her economically, expeditiously, and prudently.
15. An official shall use information which becomes known to him or her through official duties solely in the public interest.
16. A person exercising public authority is characterized by honesty and respect for the public and coemployees.
17. An official shall be polite and helpful when communicating with people.
18. An official shall be respectable, responsible, and conscientious.
19. An official shall do his or her best in the public service by constant individual development.
20. An official shall facilitate the spread of the above principles in every way.

Source: Public Service Code of Ethics, Appendix 1 to Public Service Act, adopted by the Riigikogu on January 25, 1995 (published in *Riigi Teataja* 16 [1995]: 228); code adopted by the Riigikogu on January 27, 1999 (published in *Riigi Teataja* 16 [1999]: 276).

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Appendix 2

Publication II

MacCarthaigh, M., Saarnit, L. (2019). Administrative Culture. In: *Oxford Research Encyclopedia of Politics*. Oxford University Press.
10.1093/acrefore/9780190228637.013.1452. (ETIS 3.1)

Administrative Culture

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Subject: Governance/Political Change, Policy, Administration, and Bureaucracy

Online Publication Date: Oct 2019 DOI: 10.1093/acrefore/9780190228637.013.1452

Summary and Keywords

Administrative culture is an established and prominent theme in public administration research. It is frequently used to explain or contextualize a variety of phenomena in the discipline, ranging from differences in governing styles and policy outcomes between national bureaucracies to making sense of the informal norms and values that determine the activities of individual public organizations and how they interact with political and non-state interests. It is also occasionally used to characterize a particular “type” of organizational culture, with features that distinguish it from the private or third sectors. With such varied uses of the term, as well as related concepts such as administrative style, tradition, and legacies, administrative culture attracts multiple interpretations as well as its fair share of criticisms as an explanatory tool.

In some contexts, administrative culture is an independent variable that helps explain divergence and variety in policy outcomes within and across national borders, while in others it is a dependent variable that attracts experiments and new measurement tools with the aim of producing more sophisticated understanding of its place in public governance. Early skepticism about the study of administrative culture mainly arose due to the absence of adequate methodology as well as uncertainty about how to begin empirical research into the concept. The emergence of such a methodology and tools for inquiry since the 1970s has meant that administrative culture is now firmly located in the literature and practice of government and a burgeoning literature now exists across the globe. Some of the key contemporary debates around administrative culture concern the interplay between cultures and sub-cultures within bureaucracies, the influence of distinctive administrative traditions and styles on policy outcomes, and the role culture plays in public sector reform.

Keywords: culture, public administration, organizational culture, administrative traditions, administrative styles, public administration and policy

Administrative culture is a widely but loosely used concept in the study of public administration, whose popularity is inversely connected to its precise definition. It is frequently used to explain or contextualize a variety of phenomena in the discipline, ranging from differences in governing styles and policy outcomes between national bureaucracies to making sense of the informal norms and values that determine the activities of individual

public organizations and how they interact with political and nonstate interests. It is also occasionally used to characterize a particular “type” of organizational culture, with features that distinguish it from the private or third sectors. With such varied uses of the term, as well as related concepts such as administrative style, tradition, and legacies, administrative culture attracts multiple interpretations as well as its fair share of criticisms as an explanatory tool.

In the introduction to his volume on European administrative culture, Thedieck (2007) suggests that one simple way to understand administrative culture is by considering it as the “software” that infuses the “hardware” of the legal, organizational, economic, financial, and sociological aspects of an administrative system (p. 9). However, as he concedes, this fails to sufficiently grasp the multiple ways in which the concept can be and is used. In some contexts, it is an independent variable that helps explain divergence and variety in policy outcomes, while in others it is a dependent variable that attracts experiments and new measurement tools with the aim of producing more sophisticated understanding of its place in public governance. Early skepticism about the study of administrative culture arose in large part due to the absence of adequate methodology as well as uncertainty about how to begin empirical research into the concept. The emergence of such a methodology and tools for inquiry since the 1970s has meant that administrative culture is firmly located in the literature and practice of government, notwithstanding a large variety of definitions and interpretations.

In order to present a full analysis of the concept, this article first surveys the various interpretations of administrative culture and examines the emergence of administrative culture within the different streams of cultural research. The key analytical questions in administration culture research—including the issue of subcultures—are then presented, as are a number of approaches to studying it within academic public administration. Ideas of administrative traditions and styles as alternatives to culture are also considered, and subsequently the role played by administrative culture in public sector reform. A concluding section suggests avenues for future research.

Defining Administrative Culture

With the proliferation of its use, the term “administrative culture” has spawned a variety of interpretations and meanings. Common themes emerging in the literature on administrative culture include the problem of defining culture and the level or boundaries to which analysis can be reasonably applied. On the former point, Beck (2007) bemoans the ambiguity around “what exactly is or should be meant by ‘administrative culture’ [which] has . . . restricted the exploration of its theoretical and practical potential in administrative science” (p. 29). Perhaps the most detailed survey of the concept is provided by Riggs (2002), who identifies six manifestations of administrative culture:

1. Aesthetic administrative culture as expressed through public works that salute national achievements and are focal points for public festivals and ceremonies

Administrative Culture

2. Administrative culture as the collective product of a well-trained and educated administrative class serving the state
3. Administrative culture as the shared beliefs and practices held by the community of public administrators and that, though part of a broader societal culture, is distinct from it
4. Administrative culture as representing a distinctive type of organization that is transnationally recognizable in nature (as bureaucracies increasingly resemble each other across political boundaries arising from common beliefs and practices as well as the flow of ideas between them)
5. A self-protective administrative culture in which a common code of conduct and attitudes are shared among members, which may be harmful as well as benign
6. Administrative culture as the search for collective and individual performance improvement. In this sense, what Riggs calls “normative administrative culture” includes activities that improve the efficiency and quality of public administration through research, education, and training.

Riggs’s account of administrative culture brings ideas about traditions, symbols, and artefacts into an administrative context. The importance of these manifestations in public administration research varies, starting from classical Weberian discussions of bureaucracy as a type of organization to the influence of organizational culture on developing ethical administration (Lawton, Rayner, & Lasthuizen, 2013, pp. 71-93); to the efficiency and effectiveness discussions that mirror the business administration’s approach to organizational culture (Alvesson, 2002, p. 1); to Pollitt’s (2012) discussion of governments as “placemakers,” who through social construction of places attribute (cultural) meaning to a physical location.

The most popular definitions of administrative culture reflect a variety of perspectives, but they tend to cluster around Riggs’s third and fourth interpretations of the term. Table 1 presents a few of these definitions and how they relate to Riggs’s typology.

Table 1. Popular Interpretations of Administrative Culture Using Riggs's Typology

Administrative Culture as . . .	Definitions	
the shared beliefs and practices held by the community of public administrators, and which, though part of a broader societal culture, is distinctive from it (No. 3)	Dwivedi (2005, p. 20)	"the modal pattern of values, beliefs, attitudes, and predispositions that characterize and identify any given administrative system"
	Sommermann (2013, p. 5)	"the values, convictions, attitudes and patterns of behaviour which are characteristic of a given administrative system"
representing a distinctive type of organization that is transnationally recognizable in nature (No. 4)	Sharma (2002, p. 65)	"administrative culture must necessarily be the culture of administrators, more specifically the culture of those participants whose activities are restricted to the administrative environment."
	Henderson (2004, p. 236)	"at its most basic, administrative culture may be thought of as general characteristics of public officials (i.e. shared values, attitudes, beliefs)—federal, state, and local."

Source: Riggs (2002).

Other definitions are more generic in nature. For example, Schröter and Röber (2007) speak of administrative culture as "a pattern of beliefs, attitudes, and role understandings that prevail among members of the public sector workforce" (p. 110). And Koci (2007) speaks of administrative culture "as a set of commonly held values, attitudes, and beliefs to which public servants subscribe and are expected to follow" (p. 256). But to more fully understand the concept of administrative culture, it is necessary to look at how it emerged as an subject of academic inquiry.

Administrative Culture: Society, Politics, and Organizations

Culture as a variable, as well as an object of study, is used in a variety of ways across diverse disciplines, from anthropological interpretations of culture as the study of the “way of life” in a given society to organizational psychology perspectives that view culture as the collective “programming” of the mind in a way that is distinctive among different groups (Jamil, Askvik, & Hossain, 2013, p. 900; see also, Hofstede, 2001). The plurality of contexts and purposes for which culture is used to explain the world around us have one thing in common: there is no single or universal culture but rather interconnected cultural layers or spheres of overlapping cultural influence that inform and determine the actions of individuals and organizations. These interconnected layers are clearly represented in the research on administrative culture as well, with the analysis combining data from societal, political, and administrative culture, different administrative levels (from local to international), and micro to macro levels of research.

The modern study of culture in a public governance context owes much to the work of Almond and Verba (1963), whose five-country analysis titled *The Civic Culture* proposed and popularized the concept of *political* culture as the key ingredient in successfully connecting citizens to their political institutions. For them, political culture consisted of “attitudes towards the political system and its various parts, and attitudes towards the role of the self in the system” (p. 13). Contemporaneous work by Riggs (1961, 1964) also advocated for a more “ecological approach” to comparative public administration research and, like Almond and Verba, Riggs emphasized the importance of interactions between institutions and their contextual factors, such as social structure, political tradition, and administrative culture.

Since then, and reflecting its various interpretations, the relationship between administrative culture and wider political and social cultures has been the source of much contestation. Some authors view administrative culture as a subset of an overall national political culture (Basu, 2015; Dwivedi & Gow, 1999; Henderson, 2004) whereas others, such as Peters (2010), consider administrative culture as but one of three equal cultures—alongside societal culture and political culture—that influence public administration and its position in society. Developing this idea, Peters asserts that value orientations in society will influence the behavior of individuals working within formal organizations such as national bureaucracies, as well as the manner in which those organizations are structured and managed.

Administrative culture as a theme within public administration research has been heavily informed by ideas about culture derived from organizational theory (Christensen, Lægreid, Roness, & Røvik, 2007). Within this broad field, a cultural-institutional perspective views organizations as being “infused with value beyond the technical requirements of the task at hand” (Selznick, 1957, p. 170) and as such carry distinctive ideas about what problems exist and what the appropriate solutions to those problems are. From this per-

Administrative Culture

spective, internal forces are more important than external ones in determining what is culturally appropriate behavior by employees, and the success or otherwise of externally imposed reforms will depend on their compatibility with internal cultural norms and values. In general, contemporary Western textbooks on public administration have tended to reflect this dual perspective on administrative culture—that public organizations exist within an external cultural context that will influence their work (and that of other organizations) and that each has a unique internal culture (Pollitt & Bouckaert, 2017, p. 49; Shafritz, Russell, Borick, & Hyde, 2017, p. 70).

This is not to say that organizational culture is fixed or static. For organizational theorists like Allaire and Firsirotu (1984), the cultural system of an organization is one of three interrelated components, interacting with what they call “the sociostructural system” and “individual actors.” The cultural system, specifically,

embodies the organization’s expressive and affective dimensions in a system of shared and meaningful symbols manifested in myths, ideology and values and in multiple cultural artefacts (rites, rituals and customs; metaphors, glossaries, acronyms, lexicon and slogans; sagas, stories, legends and organizational lore; logos, design, architecture). This cultural system is shaped by ambient society, the history of the organization and the particular contingency factors impinging upon it; it changes and evolves under the influence of contemporary dominant actors and the dynamic interplay between cultural and structural elements.

(Allaire & Firsirotu, 1984, p. 213)

Organizational culture is thus considered a dynamic force, and for organizational management scholars (and consultants) it is possible to mold the internal culture of an organization—such as a state bureaucracy—to meet certain ends. Schein’s influential work, *Organizational Culture and Leadership* (2010), recognizes that “culture is an abstraction, yet the forces that are created in social and organizational situations deriving from culture are powerful” (p. 7). He suggests three “levels” at which culture may be viewed in any given organization, ranging from *artefacts* and phenomena that are visible and manifest; to *espoused beliefs and values*, which are the pronounced goals, ideologies, and aspirations; to *basic underlying assumptions*, which are the unconscious, taken-for-granted values and beliefs. For an organization to reform its culture, it must recognize how each of these levels manifests itself before it can seek to successfully change its culture.

The organizational psychology work of Hofstede (2001; and later Hofstede, Hofstede, & Minkov, 2010) on *national cultures* and their effects on organizations has also been influential in the study of administrative culture and reform (cf. Pollitt & Bouckaert, 2017). Hofstede started to measure and allocate scores to an issue that scholars had previously been reluctant to quantify. Developed in the 1970s within technology from IBM, Hofstede’s work remains a prominent source for comparative scores on societal cultures despite not specifically focusing on the public sector. According to Hofstede et al. (2010),

Administrative Culture

culture is always a collective phenomenon, because it is at least partly shared with people who live or lived within the same social environment, which is where it was learned. It is the collective programming of the mind which distinguishes one group of people from another. (pp. 4–5)

Hofstede's original contribution was to quantify dimensions of culture based on the self-perception of individuals, aggregated to national cultural profiles.

Hofstede et al. (2010) updated the widely used model and proposed six key dimensions of culture. The first dimension is power distance; that is, the degree to which unequal distribution of power is tolerated. The second dimension, "uncertainty avoidance," refers to the extent to which members of a culture feel threatened by uncertainty or unknown situations and can tolerate ambiguity. The third is individualism, or the extent to which people feel independent as opposed to being interdependent members of larger social collectives. Masculinity versus femininity refers to the dominant values in organizations or societies and their association with traditional gender roles. The final dimension in the original model is long-term versus short-term orientation; that is, encouraging virtues geared toward future rewards or virtues aimed at satisfying a more immediate need. In the most recent version, a sixth dimension—indulgence versus restraint—was added. Seen as a complementary dimension to long-term versus short-term orientation, indulgence versus restraint refers to the degree to which society controls or allows enjoyment of human desires.

Hofstede's model has been praised (Søndergaard, 1994, pp. 448–453) as well as criticized (Jones, 2007). Its influence in both public and private sector research has brought attention to the interconnectedness of organizational and social/national layers of culture (McSweeney, 2002; Roberts & Boyacigiller, 1984; Smith, 2002). It has also been developed further by others, as in the GLOBE project by House, Hanges, Javidan, Dorfman, and Gupta (2004). This project provided a replication and extension of the Hofstede study by adding three additional dimensions: performance orientation, humane orientation, and future orientation.

Although Hofstede's model is not specific to the public sector, its importance to administrative culture should not be underestimated. These dimensions provide contextual data in the analysis of administrative reforms: as Pollitt and Bouckaert (2017) put it, they "help us understand why what appears to be a similar reform may be very differently received in different cultures. Essentially, the layer of societal culture forms a lens through which different reforms ideas are viewed" (p. 65). Another example of Hofstede's framework in public administration research is Mouritzen and Svava's (2002) analysis of local government administration and its organization, especially regarding the power dynamics between elected political officials and appointed civil servants.

Unlike Hofstede et al. (2010) and House et al. (2004), Jamil's (1994) work provides a framework for the public sector. Jamil proposed that "public administration as part of the national political system possesses cultural traits that are not well captured by the existing theories of organizational culture" (p. 275). The proposition here was that a study of

administrative culture has to incorporate not only the internal context of public administration (such as bureaucrats' attitudes toward work and their place of work), but also the external context, that is, bureaucracy's relationship to politics and society in general. While organizational cultural theories mostly emphasize interpersonal relationships within organizations, administrative culture emphasizes relationships not only within a bureaucracy but outside it as well. Jamil (1994) therefore sought to bridge political and administrative sciences by suggesting three dimensions for the study of administrative culture:

1. Political responsiveness, which maps the politics-administration interface
2. Social responsiveness, which focuses on the (civil) society-administration interface
3. Cohesiveness, which analyses internal sources of control and the exercise of authority and power within a bureaucracy

This approach clearly demonstrates the interaction of different cultural layers and their importance to understanding administrative culture. Jamil's idea of administrative culture having both external (political and social responsiveness) and internal (cohesiveness) dimensions reflects a general acceptance in the literature of this dual approach to studying culture in a public administration context. However, despite the emergence of this and other frameworks, the basic idea of administrative culture has remained contested.

Approaches to Studying Culture in Public Administration Research

The study of administrative culture within public administration research has gained momentum since the 1960s. In their 21st-century call for greater recognition of the role of societal culture as an independent variable in public management research, Schedler and Proeller (2007) neatly outline four approaches to studying culture and public sector organizations: sociocultural, culturalist, neo-institutionalist, and functionalist.

The first approach is sociocultural. Research adopting this view seeks to explain institutional outcomes via reference to cultural attitudes and traditions. In this vein, culture represents an independent variable that influences outcomes, and organizations, structures, and management practices will only be successful and supported by those working within them when they are congruent with the existing culture.

The culturalist approach does not treat culture and organization as separate entities or variables. Rather, organizations are considered as cultures in and of themselves and are analyzed as such. Action, behavior, and developments within organization are guided by the meaning and sense-making that members attribute to them. Culturalist theories have had little significance or impact on mainstream scholarship in public management.

Perhaps the most influential approach is the neo-institutionalist. There are three established variants to this third approach—historical, sociological, and rational (Christensen et al., 2007; March & Olsen, 1989). The dominant conception of how organizational cul-

Administrative Culture

ture is established is that informal, institutional norms and values gradually develop through evolutionary, natural developmental processes, and an organization gradually adapts via internal pressure (brought by members) and external pressure (from its immediate task environment). Unintended and unplanned, these institutionalization processes create a distinct identity, a “soul” or culture. In this understanding, culture is something that an institution is. All activity within the institution is underpinned by administrative culture, which creates a foundation of shared meaning, interpretation, and values. Institutions are defined as the body of formal and informal rules and regulations, and will have a major impact on social and political outcomes as they predetermine the behavior of actors within the organization or polity.

Much of comparative public administration research has been based on historical institutionalism, which seeks to understand institutions as the product of the unique past history of an organization (path-dependencies). Equal causes do not necessarily lead to equal effects, as the outcome of a certain policy will depend on the institutional context in which it takes place. Culture is treated as one of several contextual variables having influence on the beliefs, attitudes, and actions of individuals. As a context variable it has substantial influence on organizational processes and explains varying reform and implementation outcomes.

The second variant of institutionalism—sociological institutionalism—posits that organizations do not necessarily enhance a means-end efficiency, but are the result of interactions associated with the transmission of broader cultural processes (Hall & Taylor, 1996). For sociological institutionalists, institutions are not just formal rules, procedures, or norms. They are also symbols, cognitive scripts, and moral framing that contribute to an organization’s character. Organizations embrace specific institutional forms or practices because the latter are valued within a broader cultural environment. Organizational change happens because it enhances social legitimacy. For comparative international public administration research, the fact that new organizational practices are adopted to enhance social legitimacy rather than to advance means-end efficiency points to the importance of understanding the sociocultural context of reform.

Rational choice institutionalism suggests that cultures or culture systems are given and individual actors are shaped by them when formulating preferences and making decisions. Choices have to be made depending on a combination of the cultural forces that are at play (administrative, political, social), which will influence the thought processes of rational actors. Unlike March and Simon’s (1993) “logic of appropriateness” associated with historical and sociological institutionalism, rational choice institutionalism tends to be linked to a “logic of consequences.”

The fourth and final approach suggested by Schedler and Proeller is functionalist. Work in this perspective posits that culture should be analyzed in relation to management challenges and outcomes, that is, assessing the impact of culture on management outcomes, the influence of culture on change processes, and the determination of certain “types” of culture and their effect on management. To many, changing the administrative culture is

a major task of public management reforms, with the final aim being the achievement of a more efficient and effective public administration.

Analytical Questions in Administration Culture Research

The development of administrative culture as a field of inquiry influenced by the study of societal, political, and organizational culture, as well as the approaches outlined in two previous sections, have led to several analytical issues that are constantly debated. There are three dominant questions that appear in administrative culture research:

- What is the appropriate level of analysis (from individual officials to macro-level administrative traditions)?
- What level of administration is analyzed (local, national, supranational)?
- Is administrative culture analyzed as a dependent or independent variable?

The diversity of definitions and manifestations of administrative culture is reflected in the debate surrounding the **level of analysis** at which it should be studied. Knill and Grohs (2015) offer one way out of this, suggesting that administrative culture is best studied at three different levels:

1. The micro level, including the values, roles, and behaviors of individual members of the administration, as well as the attitudes of the general public toward administrations.
2. The macro level of administrative traditions.
3. The meso level of administrative styles, understood as the standard operating procedures of administrative behavior and decision-making.

This is different from Keraudren's (1996) proposal that the macro level should be studied first (essentially whole-of-government), followed by the meso level (departments, agencies) if macro approach gives no satisfactory result. Yun (2009) views the macro national-level interpretation as "the political thinking and idea of officials and political leaders, the consciousness and desire of the officials, the political style of administrative leaders, and the political behaviour pattern represented by public institutions" (p. 899). At the meso or organizational level, administrative culture can be viewed as "the expectations the staff of an organization have about what is 'normal'" and 'acceptable' in that organization—"the way we do things around here"" (Pollitt & Bouckaert, 2017, p. 49).

In addition to the dominant macro- and meso-level typologies of administrative culture that will be discussed in the next sections, there is a vein of inquiry on the micro level that is concerned with the attitudes and values of individual administrators and the role this plays in how we conceptualize the broader administrative system (Knill & Grohs, 2015). For example, Sharma (2002) argues that an administrative system cannot be analyzed without the analysis and understanding of the culture and behavior of bureaucrats.

Administrative Culture

Administrative behaviors infer qualities and characteristic traits, which are constituent parts of administrative culture. Behaviors as such are not synonymous with culture; behavior patterns and styles are part of culture. In this perspective, Sharma (2002) proposes that an administrative culture is widely understood to convey “ways of doing or behaving” (pp. 65–66) and proposes a number of variables that influence the activities and behavioral patterns of administrators: rationality, autonomy, integrity, and transparency. The proposition is that a change in one or more of these variables will change the nature and character of the administrative culture.

In explaining the relationship among micro, meso, and macro levels, the role of “subcultures” comes into play. Administrative culture can be supported or challenged, by two subcultures: first, the culture of each individual department or agency of government, with its own mandate, interests, client groups, and major professional and occupational components; second, professional subcultures, such as those of accountants, lawyers, economists, engineers, diplomats, and scientists, that cut across organizational boundaries. A composite administrative culture will reflect the values of all its constituent or subcultural parts (Dwivedi, 2005). On the issue of subcultures, Keraudren (1996) proposes that a study of administrative subcultures must be second to a sufficiently detailed study of administrative cultures because, even if a subculture cannot coincide with a culture, it always shares something in common with this culture, which makes it subordinate. Without this element, one witnesses not a subculture but a counter-culture or another culture (Keraudren, 1996).

In addition to the analytical levels, there is also a question of **levels of administration**. In analyzing administrative culture, researchers have usually focused on the central bureaucracy and top civil servants, profiling their traits and behavior and examining their influence on organizational performance (Jabbara & Dwivedi, 2004). Although there are several interesting case studies (e.g., Batac & Carassus, 2009; Gallego-Alvarez, Rodriguez-Dominguez, & Garcia-Sanchez, 2010; Hulst & van Montfort 2011), administrative culture in local government has received considerably less attention. Ruge (2012) has pointed out that the local government traditions that have changed considerably in the last 200 years or so are not sufficiently taken into account. This field of research becomes especially important in the case of countries, where state-local government traditions have strong historical legacies.

While administrative culture is mostly studied at the national level, a growing field of scholarship explores the idea of its presence at a supranational level. For example, given political and economic integration as well as extensive policy diffusion and transfer, the trans-European dimension of administrative culture has also attracted attention (Beck & Thedieck, 2008; Thijs, Hammerschmid, & Palaric, 2017). Equally, however, scholars argue that despite the growing density and specificity of legal standards, there is persistent asymmetry in the implementation of EU law in member states, which draws attention to the role played by administrative culture (Cini, 1997; Sommermann, 2013).

Administrative Culture

The last question deals with administrative culture as a **dependent versus independent variable**. Within academic public administration, the role and importance of *organizational* culture is a frequent subject of analysis, and like administrative culture it tends to be treated in one of two ways. Organizational cultural values are considered dependent variables that can be manipulated, altered, and modified to create the appropriate norm in public sector organizations (e.g., new public management [NPM] reforms). According to Schedler and Proeller (2007), “organizations not only possess culture, but also can create culture, and moreover, that the right culture is a trigger for efficiency and effectiveness” (p. 189). In this perspective, therefore, organizational culture is one among several factors that may determine the performance of an organization. If an organization’s leaders determine that the prevailing culture is not producing intended outcomes, they may resort to reforms to instill an appropriate culture for producing desired goals.

In contrast with this perspective, it may be argued that organizations reflect dominant assumptions, values, and norms that cannot be easily manipulated or changed. Since organizations operate and interact with their surrounding environment, they cannot guard against the influx of societal or other values. Consequently, such values are not external to the organization; they are part of an integrated totality that makes up the organization as a culture. As such, they are independent variables that need to be controlled for, or taken into account. Therefore, administrative traditions tend to be used as one of the most common independent variables in public administration research.

For the former perspective, leaders choose a course of action based on means-end rationality and alter organizational behavior at will. In the latter perspective, goals must be compatible with administrative values and organizational culture before they are legitimized, supported, and accepted. The more the goals are attuned to cultural values, the greater the possibility for their successful implementation without opposition (Christensen et al., 2007).

Administrative Culture as Tradition and Style

In more recent times, the concepts of administrative “traditions” (cf. Painter & Peters, 2010) and “styles” (Howlett, 2004; Howlett & Tosun, 2018) have come to be used as synonyms for administrative culture. Each has a different connotation and makes an important contribution to the understanding of how values and behaviors shape the activity and outputs of administrative systems.

Administrative Traditions

For Painter and Peters (2010), an administrative tradition is “a more or less enduring pattern in the style and substance of public administration in a particular country or group of countries” (p. 6). As such, administrative traditions provide one of the central explanatory variables in comparative public administration research on administrative development. They are also pointed to as an inhibiting factor to reforms such as NPM or Europeaniza-

Administrative Culture

tion as they dilute, transform, or confound them. Developing this, Yesilkagit (2010) describes two observations from studies on administrative change within comparative public administration: administrative traditions matter and administrative traditions strengthen administrative systems' capacity to persist in the face of external shocks to change.

In a European context Pollitt and Bouckaert (2017) and Kuhlmann and Wollmann (2014) distinguish between two such administrative traditions—the Continental European *Rechtsstaat*, or civil law model, and the Anglo-Saxon “public interest” system. Each retains distinctive features that are manifested in legal systems. The broad features of the *Rechtsstaat*, or “rule of law,” system are as follows:

- Following the Roman tradition, there is comprehensive codification of legal rules and the use of administrative courts.
- Administrative law is the basic guiding principle for public administration, and so the legality of all administrative actions lies at the core of accountability systems.
- A deductive and rationalistic administrative culture
- Separation of state and society such that there are both public and private legal spheres
- Administrative action is considered to be the implementation of law by means of legal specification. In other words, the role of the bureaucrat is to be one of rule-following and drawing on precedent.
- The dominant values with this tradition are the principle of legality, equality before the law, neutrality of interests, and technical expertise.

States with a common-law tradition, where the public interest model is central, have a more pragmatic attitude toward administrative action, and entrepreneurial action within the public administration is valued. Furthermore, in the Anglo-Saxon public interest system:

- There is no separation of public and private law.
- The state is of instrumental importance and the focus of activity is the government.
- There is no comprehensive codification of legal rules.
- The dominant values in this administrative tradition are pragmatism, flexibility, and the reconciliation of interests.

These traditions have an important bearing not only on how the administrative system operates but also on who works within it and the requisite skills they have. For example, with the German *Rechtsstaat*-influenced system, “lawyers are given priority in recruitment to the higher civil service, by virtue of the legalistic administrative culture” (Kuhlmann & Wollmann, 2014, p. 78). By contrast, in the British civil service “law is usually in the background, rather than the foreground, and many senior civil servants have no special training in its mysteries” (Pollitt & Bouckaert, 2017, p. 61).

Administrative Culture

The polar classification of *Rechtsstaat* versus public interest administrative tradition has been challenged as unreflective of practice and in fact most European administrative cultures display a mixture of these features (Demmke & Moilanen, 2010). However, it is still the most widely used classification, and in combination with institutional and structural (and in one case historical) characteristics it forms the basis for public administration classifications. For example, it is used by Kuhlmann and Wollmann (2014), who bring out five distinct public administration profiles in the European context, including Continental Europe Napoleonic, Continental European federal, Anglo-Saxon, Scandinavian and the Central-Eastern and South-Eastern European groupings.

This combination of cultural and structural dimensions poses an interesting question about the relationship between structural and cultural elements. Although the definitions brought out in the previous section tend to focus on the cultural elements (values, symbols, beliefs, norms, etc.), Riggs's concept also hints at structural elements (administration as a specific type of organization). Yesilkagit (2010) conceptualizes administrative tradition as, "on the one hand, ideas and beliefs about the nature of government in a specific national context and, on the other, institutions and structures of government that are created in the past and encoded in a present institutional constellation (p. 148). Or, as Painter and Peters (2010) put it "traditions 'live' both through the thoughts and actions of contemporary actors and also through the 'dead hand' of inherited structures that constrain them in carrying degrees" (p. 6).

Although Western understanding of public administration is often presented as "global," several competing approaches can be identified. For example, Drechsler (2018) and Jordan and Gray (2011) point to Confucian, Islamic, and Buddhist administrative traditions, whereas the anthropological work of Blundo and Le Meur (2008) explores varieties of postcolonial administrative cultures that inhabit African states. Painter and Peters (2010) propose Anglo-American, Napoleonic, Germanic and Scandinavian administrative traditions for understanding the global North, and add to it the Latin American, postcolonial South Asian and African, East Asian, Soviet, and Islamicist traditions.

Most of these non-European traditions present an intriguing amalgamation of European (colonial) influences and local traditions, including religious background and preexisting local governmental structures and practices (Painter & Peters, 2010). The Confucian administrative tradition—"governing by people" (as opposed to the Roman *Rechtsstaat* tradition of "governing by law"; Elliot, 2009, p. 152), with its emphasis on a highly educated "mandarinate" class of top administrators to control state affairs, has been particularly influential across Asia (Painter & Peters, 2010), despite its considerable Westernization (Drechsler, 2018, p. 25). The Soviet system presents a radically different administrative culture, due to its extreme political control and the influence of one particular political ideology imbedded not only in civil service but also in society (Painter & Peters, 2010; Peters, 2010). Its influence on postcommunist administrative reforms is still debated (cf. Meyer-Sahling & Yesilkagit, 2011). Jordan and Gray (2011) conclude that although values such as efficiency, economy, expertise, and others "persist as ethical and practical norms . . . these terms do not translate similarly across all contexts" (pp. 347-349), re-

Administrative Culture

flecting strong historical patterns and the importance of religious background (even in seemingly secular traditions, as in Europe).

Painter and Peters suggest four factors that further differentiate administrative traditions (2010, pp. 6–8):

- 1. The administration's relationships with society.** The various concepts of state, like the contractual understanding that is characteristic of Anglo-Saxon tradition or a more organic view that is dominant in the Continental Europe, present a different understanding of relationships between societal actors and the bureaucracy. The nature of these relationships may reduce the autonomy of the state and constrain the ability of the public bureaucracy to act with the type of authority at the heart of Weberian conceptions of bureaucracy.
- 2. The relationships with political institutions.** In essence this concerns the degree of political involvement in the bureaucracy (Peters & Pierre, 2004). The relationship with the political class may also influence the level of administrative capacity, the fundamental question being whether technical (merit) or political criteria dominate in administration.
- 3. Law vs. Management.** This concerns the extent to which public officials are legal figures tasked with identifying the legal foundations of public actions and implementing that law, or whether there is an emphasis on management where the task is to make programs function as efficiently and effectively as possible.
- 4. Accountability.** Conceptions of accountability differ significantly across social and political cultures. Judicial means of enforcing accountability might be the primary mechanism for controlling a bureaucracy, such as via special administrative courts. The primary alternative to this legalistic form of accountability is to rely on political forums, especially parliaments, as the primary mechanism for its pursuit.

Painter and Peters concede that clustering by families of administrative “tradition” and asserting that “traditions matter” is not to say that there can be no change, or national distinctiveness, nor that all change within a particular national system is always in one direction or along one preordained path. Furthermore, administrative traditions are not always benign, and may for example inhibit reform or contribute to corruption (Islam, 2004; Jamil, 2007). For example, in her work on power structures within Mexico, Nuijten (2004) identifies that administrative culture may inadvertently sustain corruption as citizens seek to circumvent otherwise labyrinthine bureaucracies. The concept of administrative tradition has also been criticized for being interchanged with state tradition, for referring to both ideas and beliefs about public administration as well as to the structure of a state's administration, and for ambiguity as to whether there is just one national administrative tradition in a polity or if several coexist (i.e., sectoral, national; Yesilkagit, 2010).

Administrative Styles

According to Howlett (2003), an administrative style is “a more or less consistent and long-term set of institutionalized patterns of politico-administrative relationships, norms

and procedures” (p. 475). Knill, Eckhard, and Grohs (2016) speak of administrative styles as “the standard operating procedures and routines that characterize the behaviour and decision-making of bureaucracies” (p. 1059). Like culture and tradition, the idea of a national administrative style has been used to explain policy variation in different contexts and is typically conceived of as a dimension of the broader concept of administrative culture. It draws from the idea of a “national policy style,” which Lodge (2012) identifies as the “dominant procedural ambition which reflects the preferred choice of instruments and mirrors normative values in how to achieve accommodation” (552; see also, Howlett & Tosun, 2018).

The idea of administrative styles offers a complementary perspective to approaches that confine themselves to the explanatory relevance of institutional structures and formal rules. Under conditions of uncertainty and complexity, administrators and policy-makers develop routines in order to cope with shortages of knowledge, information-processing capacities, and time (Simon, 1997). At the level of the organization, such coping strategies can consolidate into stable patterns of problem-solving behavior (Knill et al., 2016). Enkler, Schmidt, Eckhard, Knill, and Grohs (2017) argue that the concept of administrative style usefully captures these informal procedures and routines that are not officially anchored in the organization’s mandate but are nonetheless crucial for understanding its policy-making capacity.

Similar to administrative traditions, administrative style has both a structural and behavioral component. Thus, while referring to the behavior of administrative agents, these agents operate within an institutional context that at least in part determines their behavior. As such, they are situated within a neoinstitutional approach to the study of social and political life (Howlett, 2003). Such styles are long-lasting, quasi-permanent arrangements establishing a trajectory of activity that is very difficult to change (i.e., path dependency). Since institutional structures are different, it is to be expected that there will be many different kinds of administrative styles, each style being defined by its institutions, rules, traditions, and cultures. The debate concerning the appropriate level of analysis to which these concepts can be applied reflects that surrounding administrative culture more generally. For example, Howlett (2004) suggests a three-level analysis of administrative style (national, sectoral, departmental) similar to that of Knill and Grohl. And there is also a transnational element to the literature on administrative style, with Knill et al. (2016) and Enkler et al. (2017) focusing on style within international public administrations.

Administrative Culture and Reform

By far the most common context within public administration research for administrative culture to be used is that of reform and the role it plays in facilitating, inhibiting, and modifying reform efforts. In the study of comparative public administration reform, administrative culture is typically posited (alongside state structures and politico-administrative relations) as one of the most influential factors that influence the effectiveness of

Administrative Culture

administrative reform efforts and reform discourse (Kuhlmann & Wollmann, 2014; Pollitt & Bouckaert, 2017). This view is shared by others such as Anechairico (1998), who argues that “administrative culture is produced by a combination of historical, structural, and contemporaneous political factors that shape not only internal rules and customs, but also the predisposition to reform” (p. 17). Similarly, Thedieck (2007) proposes that “administrative culture characterizes . . . the attitude towards change such as administrative reform” (p. 9). Schick (1998) even argues that most developing countries should not implement public management reforms such as those demanded by international organizations, *inter alia* for reasons of cultural differences.

Despite the disagreement over its meaning, culture is universally considered to be an important factor in determining the success or failure of public management reform efforts. Research on reform usually elaborates how societal and organizational cultures define the context for reforms and how culture influences the extent to which administrative reform ideas are taken up in public management practices (Schedler & Proeller, 2007). Countries’ experiences of reform differ because cultural contexts and administrative developments have taken divergent paths, which in turn leads to differences in administrative norms and values and thus diverse “implementation habitats” (Verhoest, 2011, p. 47).

As with the analysis of culture, different dimensions of culture are used to explain reform successes and failures. For example, at an organizational level, Bovaird (2007) suggests occupational and sectoral cultures were at play in determining the divergent adoption of public sector reforms within the United Kingdom. Considering administration culture as a national and societal-level phenomenon respectively, Schröter (2000) and Koci (2007) draw on Hofstede’s framework to explain differences in reform intensity between Germany, the United Kingdom, and Swiss language communities.

In one of the earliest attempts to introduce cultural theory into public management reform research, Hood’s *The Art of the State* (1998) applied the “grid-group” cultural theory of anthropologist Mary Douglas and political scientist Aaron Wildavsky (1982). Hood argued that four management styles exist that map onto the grid-group categories (hierarchical, egalitarian, individualist, and fatalist way) and used the categories to explain developments in public management reform, such as the spread of NPM around the world. However, Schedler and Proeller (2007) argue that it remains unclear how the move “down-grid/down-group” should happen, and what public managers can do to make this step with their organizations (p. 23). Moreover, other scholars criticize the crassness of reducing national cultures to two dimensions as is done in the grid-group theory.

Pollitt and Bouckaert (2017) developed a widely used framework for analyzing determinants of administrative reform. They identify structural, cultural, and functional elements of politico-administrative systems that change infrequently, and therefore can be regarded as rather stable characteristics of the environment in a given polity. These elements also exert a significant influence over both the choice of reforms to be adopted and the feasibility of their implementation, as identical (or at least very similar) reforms will develop differently in one national (or sectoral or local) context as compared to another. They sug-

Administrative Culture

gest five elements that will have a bearing on public management reform efforts: (1) state structure, (2) type of executive government (majoritarian versus consensus), (3) minister/mandarin relations, (4) diversity of policy advice, and (5) the administrative culture. In relation to this latter element, they use the *Rechtsstaat* or “public interest” dichotomy, suggesting that the closer a state is to either model will have a bearing on the type of reform that is successfully implemented.

In the case of the much-vaunted NPM reforms, it has been proposed that the market- and performance-based managerial ideas germane to NPM fell on more fertile ground in the Anglo-Saxon public interest culture where legal and conceptual differences between public and private sectors are unknown and a more “entrepreneurial” culture exists. In contrast, they were less compatible with the continental European administrative culture where the execution of law remains the predominant administrative activity. *Rechtsstaat* systems are considered to be “stickier” and slower to reform than public interest regimes because management change requires changes in the law and, culturally, because senior civil servants who are highly trained in administrative law may find it more difficult than generalists to shift to a “managerial” or “performance-oriented” perspective.

Administrative culture has also been one of the key aspects of discussions about post-communist transition and administrative reforms. However, the sweeping label of post-communist countries is subject to increased criticism, due to significant differences among the countries (e.g., Holmes, 2015; Meyer-Sahling, 2009). However, at the earliest stages of transition these countries were characterized by the absence of the rule of law that manifested itself in a mismatch between official rules and their implementation, personalistic and discretionary governance, and high levels of politicization (Meyer-Sahling, 2009). Several authors have considered these (administrative) legacies of the communist era as one of the factors (alongside environmental pressures and political actors) that determined not only the outcomes of reforms but also what reform ideas are suitable in the context of post-communist transition (Drechsler, 2005; Meyer-Sahling, 2009; Verheijen, 2007).

These three factors—administrative legacies, environmental pressures and political actors—are somewhat similar to some of the elements brought out by Pollitt and Bouckaert (2017). However the way they are interpreted seems more extreme. Communist legacies, whether structural or cultural, are seen from a strongly negative perspective and as an obstacle that needs to be overcome (Verheijen, 2007). In short, it is not about tweaking the way things are done while respecting the existing system, as in many Western European administrative reforms. This negativity is clearly a result of the perceived illegitimacy of communist administration (Drechsler, 2005), and essentially means that in the initial transformation, post-communist countries “cannot draw lessons from their own experience” (Rose, 1993, p. 112). Therefore, environmental pressures are portrayed in a more intense manner, especially through the conditionality of EU accession (Grabbe, 2003) and “supply-based policy transfer” (Randma-Liiv, 2005), meaning that these countries were dependent on what was required and what advice was offered, while lacking expertise to predict the impact of reforms in highly unstable environment. There has been

much criticism of the suitability of NPM, the dominant public administration paradigm during 1990s, which was actively promoted in post-communist countries (Drechsler, 2005). In addition, there is still no agreement as to whether NPM reforms have been successful in the post-communist countries (although Dan & Pollitt, 2015, state that they can work, their conclusions are challenged by Drechsler & Randma-Liiv, 2016).

Recent research on public management reform has begun to investigate developing or transitional countries. These studies look at why NPM specifically, which proclaimed to have principles of universality, failed to have the same effects as in developed countries. For example, Jabbara and Dwivedi (2004) assess the impact of globalization on administrative cultures in the Middle East and South Asia. They find that administrative cultures in Middle Eastern countries are still shaped and even dominated by continuing local and indigenous bureaucratic structures and practices, such as nepotism, patron-client relationships, and corruption. This highlights the need to appreciate the importance of indigenous traditions, styles of governance, and administrative cultures that reflect the distinctiveness and complexities of the developing countries' national identities. Indeed a consistent theme in comparative public management research has been a warning against transplanting NPM reforms, which originated mainly within Anglo-Saxon developed countries, straight into other cultural settings.

Conclusions

Administrative culture continues to be an elusive concept in public administration research and one that is heavily informed by developments in other related disciplines, such as management and organization studies, as much as by the political and social sciences. However, there is clearly much scope for research on administrative culture that develops models and frameworks that are specific to government bureaucracies, rather than drawing on national-level frameworks designed for understanding the private sector business or social cultures. And although our understanding of global families of administrative culture has enhanced the field, much more work needs to be done to compare and contrast administrative culture cross-nationally. How administrative culture and administrative reforms interact and influence each other is best assessed over time and such longitudinal studies offer much scope for future inquiry.

Several key debates presented here remain relevant to the study of administrative culture, including:

- The “level” to which the concept applies, e.g., a national, whole-of-government focus or an organizational, departmental one. Typologies and models have been developed for all those levels and they all remain relevant to the study of administrative culture. In addition, the administrative culture of international organizations is an emerging field of study, whereas local governance is lagging behind.
- The question of convergence versus divergence has been raised through the influence of international promoters of administrative reforms (e.g., EU, OECD, WB, IMF,

Administrative Culture

etc.). Despite the seemingly strong international influences, administrative cultures have shown remarkable persistence in maintaining their own identity and filtering reform ideas. But administrative culture also involves the absorption of new ideas, molding these new ideas to the existing system (and vice versa) while maintaining the core features of that system.

- Administrative culture research is closely connected to the analysis of societal and political culture and uses the main concepts from those fields as well as from the field of organizational culture. The main questions concern the openness of a state's administrative system to cultural values from the political realm and society more broadly, and what values make a national administration distinctive. Therefore, different dimensions developed for the analysis of culture (e.g., Hofstede's), are used as independent variables in public administration research to explain the characteristics of administrative culture, administrative reforms, and policy styles.
- Similar to public administration research, administrative culture research is mainly of Western origin: the main typology of administrative traditions (*Rechtsstaat* vs. common law) is based on European classifications and does not necessarily take into account the non-Western approaches that have their own understanding of good administration and corresponding ethics.
- The role played by administrative culture in management reform efforts within the public sector is not only an important field of research in a Western-European context, but is also rapidly gaining interest in the context of transitional or developing states. In the case of transitional states, the issue of political and administrative discontinuity makes administrative culture research especially interesting in the context of administrative reforms, as the proposed (or imposed) reforms that might lack the support of administrative culture and might therefore fail. This also helps to link questions of administrative culture to non-Western public administration research and has enabled the expansion of typologies to the rest of the world.

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Appendix 3

Publication III

Saarniit, L., Pevkur, A. (2019). Teaching Ethics in Academic Curricula: Case of Five Disciplines in Estonian Public Universities. *Ethical Perspectives*, 26 (1), 33–58. 10.2143/EP.26.1.3286288. (ETIS 1.1)

Teaching Ethics in Academic Curricula. The Case of Five Disciplines in Estonian Public Universities

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ABSTRACT. Ethics education in academia takes several forms: academic ethics, research ethics, and professional ethics. The first two can be deemed the most relevant in the academic context, since these shape the attitudes of students as well as future researchers and scientists. However, from a societal perspective, ethics education in academia might be more relevant when it comes to shaping individuals with a strong personal and professional integrity. The main research question of our article is: how is (professional) ethics education embedded into academic curricula? Our assumption is that during academic preparation, ethics-related topics tend to be discussed in a compartmentalized manner, which prevents students from applying ethical concepts (e.g. social responsibility or conflicts of interest) or values acknowledged in academic life in other contexts of social and work activities. To explore this issue, we analyse the bachelor's and master's level curricula of five academic disciplines in Estonian public universities in regard to teaching ethics. The disciplines were selected because of their importance in the public sector and the well-established professional ethics within their professional networks. The empirical data was mainly collected through document analysis (curricula, course syllabi). The article focuses on whether the curricula include any ethics-related courses, which ethics issues are discussed and how, and what is the general context of ethics discussions (philosophy, job-specific focus, a wider societal focus, inclusion of different contexts of ethics-related issues, etc.). Thus, the analysis of teaching ethics in academia will indicate the integrity of academic education in a broader context.

KEYWORDS. Ethics, professions, higher education, Estonia

I. INTRODUCTION

Would it be acceptable if a journalist criticised the decisions of an elected official or governmental decisions? What about a doctor criticising the functioning of the public medical system during ministerial

workshops about the healthcare system or in media interviews? In democratic countries, the answer would be ‘yes’. It is the main aim of journalists to point out questionable policies and draw the public’s attention to problems, so that citizens can later make informed decisions in the elections and in public participation. Doctors, as the closest and most observant participants in the medical system, can be a valuable source of information on how well the system is doing. As freedom of speech is considered a basic human right, journalists and doctors can criticise as long as their information is correct, does not run counter to good professional behaviour and does not engage in slandering.

However, would the answer be the same if that journalist no longer worked for a newspaper or the doctor no longer worked for a hospital, but both were employed as public officials by a governmental agency? In such cases, the answer would not be so straightforward. Countries have different opinions about public officials’ freedom of speech, with the Nordic countries and the United States having quite opposite opinions. In Nordic countries such as Norway and Denmark, public officials’ codes of ethics state extensive rights to freedom of speech, whereas in the United States the courts have increasingly started to treat – and thus limit – the opinions expressed by public officials as spoken on the part of the government, even when off-duty (Norton 2009). The two aforementioned cases are a clear example of how certain activities are acceptable in one professional setting, but may be criticised in another. In short, these differences show that context and societal roles determine what is considered ethical behaviour. As in these situations, the correct or justifiable decision is not self-evident and the way context and roles influence ethical behaviour and decision-making should be discussed and taught, preferably during professional education.

During the last few decades, ethics has been accepted as an integral part of professionalism (Koehn 1994; Martin 2000; Davis 2003). Most professions pay significant attention to ethics issues in their academic studies and practical performance of their duties, using their codes of ethics (or codes

of conduct) and ethical dilemmas faced by professionals as a starting point. However, in the contemporary world, not all of those who have been trained as doctors end up working for a hospital nor do all law graduates become attorneys defending the accused in the courts. One professional background may lead to several career paths in different sectors and settings. So, the question is raised: when it comes to ethics, how well does academic education prepare graduates for work in different environments?

The problem may lie in existing ethics education in general (e.g. whether the issues are discussed and if yes, then which issues are covered and how). On the other hand, the problem may concern the isolation of the academic disciplines in regard to teaching ethics, which focuses narrowly on the issues most relevant in the profession but disregards the social context in which the graduates will practice as well as those ethics norms that concern their role as (public) professionals. In addition, ethics education is a good example of using the so-called third mission of universities – solving social problems (see Göransson *et al.* 2009). In this case, preventing future misconduct in professional life in a narrower sense and corruption in a wider sense.

Therefore, our contributions begins with a discussion of the issue of professions, professional education, and the role of ethics in professionalism. Our aim is not to analyse the shaping of professional integrity as an individual's "moral intention and character" (Six, Huberts 2008, 72) or relying on an inner moral orientation that guides those professionally engaged in the public sphere (Blijswik *et al.* 2004). Our focus rather is on the preconditions of academic preparation that would allow professionals to shape and develop their own professional ethical behaviour.

With the help of document analysis, we then analyse the curricula of five disciplines – law, medicine, public administration/political science, education, and journalism in three Estonian public universities preparing professionals. Through this analysis we draw conclusions on the coherence and consistency of academic education in regard to preparation for professional roles in public life.

II. PROFESSIONS AND PROFESSIONAL ETHICS

There is no definitive list of characteristics of a profession (Abbott 1983, 856; Pritchard 2006, 4), however, originally – with regard to three professions (medicine, law, and clergy) dating back to medieval universities – the most common definitions referred to a calling requiring specialized knowledge and often long and intensive academic preparation. Over time, the list has expanded, now including societal demands on professions, ethical codes of conduct¹, systems of self-regulation, etc. (Frendreis and Vertz 1988, 78-79). In the context of the present article, there are two traits that require more attention: societal expectations and demands, and professional ethics (i.e. an understanding of appropriate or good behaviour in professional activity). Professions' focus on their connections with society takes two main forms: their corporate obligation to serve society and obligations towards their clients (Abbot 1983, 855-856), creating two levels of ethics questions.

On the one hand, a narrower way to view ethics issues is through the client relationship and the dilemmas it creates. In the contemporary world, professions have an important role in providing services to society. Through their expert knowledge and skills, professionals are at an advantage in a relationship with a layperson, which gives them an opportunity to abuse their power. Therefore, to maintain trust in professional service it is necessary to have a clear understanding of the principles and norms of professional action, so that the clients and the public in general can – whenever they feel it is necessary – ethically scrutinise the activities of professionals who (have the right to) interfere with their lives. As Musschenga observes, “People in modern, highly differentiated societies are dependent on all kinds of often anonymous officials, experts, producers and retailers for getting goods, benefits, services, treatments, and so on. Therefore they have, especially when the relations are asymmetrical, an interest in the trustworthiness and reliability of persons acting in such roles or capacities.” (2002, 174). Larry May summarises the situation as

follows: “Philosophical ethics in general, and professional ethics in particular, need to face up to the social facts of contemporary life and to change correspondingly their viewpoints and research agendas” (1996, 7).

Let us take a relationship between an attorney and her client as an example. Professional ethics require attorneys to put their client’s interests above all others, including their own, thus conflicts of interest are primarily seen in situations where the attorney’s ability to do so is impaired. We can even take it a step further: granting this privilege to their clients, attorneys as a professional community ensure the public that their services can be trusted. Thus, through the individual client relationships, society at large benefits from the services provided. This level of issues has become more important over time, as it seems that professional action is not only evaluated based on expert knowledge and skills, but also from the perspective of certain ethical expectations. As Koehn observes, “I will argue that professional practices qualify as morally legitimate because, and to the extent that, they are structured to merit the trust of clients” (1994, 9). In addition, this relationship is not one-sided: the greater the influence of an occupation on people’s lives (e.g. doctors, teachers, lawyers, public officials), the greater the need to establish professional standards, including ethical values and norms. Clients and the public expect those standards to be established and followed, thus exerting influence on the professional community. It can be concluded that providing ethics education during training is crucial in ensuring professional services.

On the other hand, we can look at professional ethics through its obligation to society as a whole, separate from client relationships. As Freidson points out, a sociological view of professions sees professionals as “[...] honoured servants of public need, conceiving of them as occupations especially distinguished from others by their orientation to serving the needs of the public” (1994, 13). Thus, it is not only through client relationships and providing a necessary service to society that professions serve the public, but also through a wider sense of duty. May emphasises

the societal aspects even more by stating that “[...] moral concepts such as integrity and responsibility need to be understood as embedded in social structures and processes such as socialization, solidarity, and collective consciousness. Integrity and responsibility are not the exclusive purview of isolated individual consciences” (1996, 2).

The societal context of practicing in some professional field becomes more obvious if we look at changes in the labour market and career development. Firstly, there is an ever-increasing number of jobs that are not tightly related to prior formal education or skills, but rather require a combination of knowledge and skills (Bridgstock 2009, 33-34) originating from different disciplines and professions. Interdisciplinarity has become a dominant feature of many professions (see Frodean *et al.* 2000). For example, lawyers who know the intricacies of medical practice and doctors who know engineering can become sought-after professionals because of their additional knowledge in a specific discipline. Secondly, professionals may have been trained in one field, but practice in another. Professional skills can be acquired not only by studying, but also through practicing in a particular context (organisation, sector, etc.). As a result, through practice individuals can become members of a different professional community than the one for which they originally studied. For example, doctors who do not practice as physicians, but instead focus on teaching, administration, or research, and thus become part of an academic, bureaucratic, or business community. In these two cases, we cannot see the ‘serving the client, serving the public’ logic, but rather a mixture of several professional communities, commitments and professional loyalties. Therefore, the concept of professional ethics cannot remain within the confines of one profession, but has to balance multiple occupations, roles and environments.

This mixing of professional identities and values is best represented in public service. Only a few countries have the majority of public servants (or even only senior civil service) coming from one discipline or a few universities (France, Germany, and Japan are the most notable examples

[Peters 2010, 88-90]) or who are very strictly socialised through career-systems that create a strong sense of professional ethos and identity. Public service organisations mostly tend to be an amalgam of different professions, disciplines, and career-paths. As the open, position-based systems in public service take into account the requirements of the vacant position, they make it possible for individuals with different educational and professional backgrounds to compete for public service positions. A marine biologist may successfully apply for a position in the ministry of the environment although she lacks formal education in public administration. A specialist in human resource management may get a job in the same ministry. Again, she may lack training in public administration; instead, she may have both formal education and practical experience in human resource management and belong to the relevant professional community. In these cases, the individuals in question are trained to be professionals in one sphere but not in the other, even if they meet the criteria set for public servants in a given position. And more importantly, they might have had no (academic) preparation to understand different expectations of private and public sectors and to recognise potential ethical dilemmas or conflicts of interests of different contexts. Looking at civil servants, Poulsen concludes “[...] it turned out that the most important identity feature among the civil servants was linked to their educational background. Thus educational background seems to be a very strong part of the civil servants’ identity” (2007, 487-488). Therefore, we suggest, that different contexts and roles should be addressed during (academic) professional education, to increase awareness of ‘different environment, different ethical requirements’ and thus prevent unethical behaviour.

In conclusion, we deduce that if society wants to promote ethical behaviour in workplaces and in society in general, professional ethics must be taught already at the university level, offering students knowledge and skills to make decisions when encountering various ethical dilemmas. Ethics education should preferably discuss not only ethical dilemmas in

relation to client relationships, but also discuss societal responsibility as well as how different contexts might influence the applicability of ethics rules.

III. METHODOLOGY

Thus, our main aim is to analyse how ethics issues are included in academic curricula and whether the way ethics education is embedded in it creates preconditions for shaping ethical professionals who can work in multiple contexts. To answer these questions, we have used document analysis to study the BA and MA level curricula and course syllabi of five disciplines – law, medicine, public administration/political science, education, and journalism.

There are several reasons for choosing these disciplines. First and foremost, all these professions have a clearly established understanding of professional ethics within their professional networks, including existing codes of ethics and other ethics management instruments (e.g. ethics councils, courts of honour, etc.). Therefore, it is reasonable to expect that academic education covers topics of professional ethics and it should be noticeable in the curricula.

Secondly, we have limited ourselves to the professions that are most relevant to the public sector, because as we stated above, the public sector context can create roles that differ when compared to the roles commonly discussed in professional ethics. Another reason for the choice of law, public administration/political science, medicine and education curricula is their relevance in the everyday lives of ordinary people and the role of these professionals as street-level bureaucrats. A classical definition by Lipsky refers to street-level bureaucrats as “[...] public service workers who interact directly with citizens in the course of their jobs and who have substantial discretion in the execution of their work” (1980, 3). Their role in the delivery of public services and impact on policy output and outcomes is extremely important due to their direct contact with

people, through which the general public understands whether their taxes are spent transparently and efficiently. In regard to ethics, the more contact people have with these professions, the more influence these have on the public perception of what are the ethical norms in a society or how corrupt a society is.

The last discipline, journalism, has been included because of its watchdog role in society: the journalists' interpretation and analysis of what is happening in society plays a role in portraying the right or wrong behaviour and shaping the public's attitudes toward misconduct. Their understanding of their own as well as other professions' ethical norms plays a crucial role in explaining the wrongdoings of professionals to the public.

In answering the 'how' question, we do not ask which methods are used for teaching ethics or limit ourselves narrowly to the question whether professional ethics is taught as an individual course. The first question would not find a reliable answer through document analysis alone. In looking for different forms of ethics education, we recognize that ethics may be taught, for example, from a philosophical perspective, professional perspective, societal expectations perspective, or as a combination of these. Table 1 gives an overview of the specific forms and their operationalisation. Broadening our research framework to include the philosophical approach (and not just the professional approach), serves two main purposes. On the one hand, the kind of ethics education that is focussed on moral philosophy also contributes to the development of ethical reasoning and critical decision-making skills on an individual level – skills that might be transferred to professional practice as well. On the other hand, although the philosophical approach might contribute to the aforementioned skills, it might not be sufficient for appropriate and right decision-making in a professional setting. As the societal expectations' aspect in teaching ethics-related topics can be discovered only via content analysis of the curricula or syllabi, we were not searching for specific courses, but rather looking

for references to ethics, values, social responsibility, different roles of professionals, etc. We have excluded research ethics, as it is not relevant to our current research question.

Table 1. Forms of Ethics Education in Curricula

1. No ethics-related courses	Curricula or course syllabi do not include any references to ethics, ethical dilemmas, professional values or ethical codes, etc.
2. Ethics from a philosophical perspective	Curricula and course syllabi deal with ethics from a philosophical point of view, e.g. references to classical or contemporary philosophers, questions of morality, personal moral aspirations.
3. Combination of philosophical and professional approaches	Curricula and course syllabi include elements of a philosophical approach as well as professional ethics; references to philosophers, questions of morality, as well as professional ethics codes or professional roles.
4. Focus on professional ethics	Curricula and course syllabi include references to relevant codes of ethics or codes of conduct, relevant legal regulations; professional roles defined within one typical type of organisation or career path.
5. Focus on professional ethics with applications within different contexts (societal expectations)	Curricula and course syllabi include references to relevant codes of ethics or codes of conduct, relevant legal regulations; definitions of professional roles include typical career paths as well as references to how the role might differ depending on organisations or sectors; references to societal expectations or social responsibility.

In addition to classifying all the curricula based on the criteria in Table 1, every ethics-related course was coded in accordance with the following criteria: level of study (bachelor's, master's, integrated degree), type of course (compulsory, elective), workload (ECTS credits), and keywords mentioned in the learning outcomes and syllabi (if available). We focus on the bachelor's and master's programmes², as their graduates (especially of the latter) are expected to join the labour market.

The data was gathered through electronic study information systems of universities that list all the curricula as well as courses, including learning outcomes and occasionally links to syllabi. At first, ethics-related keywords were used (ethics, values, professional ethics, etc.), then a systematic review of the curricula was conducted. As the curricula can differ from one academic year to another, the curricula for academic years 2014-2015 and 2017-2018 were selected. We recognize that document analysis is limited in its approach: based on the curricula and list of courses, we cannot draw conclusions on how extensively professional integrity issues are discussed within other more specific courses in a piecemeal fashion. Nor can we draw any conclusions about how the graduates assess their knowledge and skills of professional ethics.³

IV. ETHICS EDUCATION IN ESTONIAN PUBLIC UNIVERSITIES

Estonia presents an interesting case for analysis. In 25 years since regaining its independence, Estonia, a former Soviet republic, has excelled in international comparisons with its stable governance (World Governance Indicators 2017), relatively low level of corruption (Transparency International 2018), sustainable and active civil society (USAID 2015) as well as a high level of press freedom (Freedom House 2017).

Estonian higher education regulations (Kõrgharidusstandard 2008) require the teaching of (professional) ethics. The selected five disciplines all have well-established professional ethics requirements in Estonia: all of them have adopted codes of ethics and most of them have ethics councils⁴ (with the exception of teachers). On the downside, Estonia's own surveys show that although direct contact with corruption has decreased, unethical behaviour and breaches of professional ethics norms remain an issue and the medical sector as well as the educational system are considered among the most corrupt public services in the country (Ministry of Justice 2017). Considering this partly contradictory background, university curricula in Estonia offer an interesting field for research.

The five disciplines – law, public administration/political science, medicine, education, and journalism – are taught in several public and private Estonian universities, but as the three relevant public universities⁵ play the biggest role in the number of graduates and their role in the labour-market, the analysis focuses on the University of Tartu, the University of Tallinn, and Tallinn University of Technology. The disciplines are also strongly linked to the public sector in Estonia. The Estonian public sector constitutes 23.5% of total employment (Statistics Estonia 2017), with almost 3/4 of public sector employees working for the governmental sector (including central and local government and public social insurance funds; Ministry of Finance 2017, 8-9). Looking at educational background, 41% of the employed have a tertiary education, in public service 61% (Ministry of Finance 2017, 52-53). There are no specific statistics on the disciplines in which the tertiary education has been obtained, thus only a few indirect conclusions can be drawn. The majority of people employed in fields of education and health/social services work within the public sector, respectively 89.1% and 63.9% (Statistics Estonia 2017), with required degrees from a narrow selection of curricula (degrees in education or medical studies). A significant part of the law and public administration graduates work in the public service as well as the public sector. Besides private sector job opportunities, the curricula in the field of law specify working for the public sector/service among their general aims and learning outcomes. For public administration curricula, the public sector and public service are presented as the main line of work, although the non-profit sector and international organisations are also mentioned.

In addition to its role in employment, the Estonian government also regulates higher education to a certain extent. All the higher education curricula have to comply with the general quality standards set by the Estonian government. These standards (Kõrgharidusstandard 2008) specify the general learning outcomes for studies at all academic levels and include references to professional ethics, especially on the master's level.

On the bachelor’s level, one of the outcomes states that all graduates “[...] must know how to evaluate the role of knowledge, the role of their professional activities in society and its consequences, taking into account scientific, social, and ethical aspects” (Kõrgharidusstandard 2008, 1/1.1). On the master’s level, the learning outcome requires that the graduates know “[...] how to act in case of ethical dilemmas, know the ethical aspects, opportunities, limitations, and social role of their activities” (Kõrgharidusstandard 2008, 1/3.1). On the doctoral level, the document emphasises competence in science ethics (Kõrgharidusstandard 2008, 1/4.1). So, we can conclude that there are governmental level requirements for teaching professional ethics in universities. However, in two cases where the government has established framework requirements for professionals – teachers and medical doctors⁶ – professional integrity is essentially not mentioned. In the case of teachers, the regulation (Õpetajate koolituse raamnõuded 2000, 2/1) states that pedagogical training has to ensure that teachers follow “[...] human ethical principles and respect the human dignity of students”, thus the focus is not necessarily on professional integrity but on general ethical behaviour that should characterise everyone. In the case of medical doctors, the regulation includes no references to ethics or values (Arstiõppe 2004, 6). As the general governmental requirement for teaching integrity or ethics is there, the rest of the decisions about what and how to teach lie within the discretion of the university: the institutes and faculties offering the programmes. Therefore, we must look at the curricula.

V. MAIN FINDINGS

The aforementioned two methods of data collection – keyword-based search and systematic review of curricula – provided somewhat contradicting data. Firstly, several ethics-related subjects were listed in study information systems of universities, although quite a few of them did not appear in any curricula or they had not been taught in several years. Also,

as was later revealed, many of the professional ethics issues were not discussed under titles containing the keywords, but were included in subjects focussing on such topics as professional development, identity, management, etc. As the curricula provided more consistent data that could also be reviewed from a longitudinal perspective (if needed) and one course was often part of several curricula, the analysis is based on the curricula and at a later stage on the courses. Although the focus of the document analysis was on the curricula for the academic years 2014-2015 and 2017-2018, there are differences between the two periods concerning the list of curricula as well as the list of ethics-related courses.

Table 2. Number of Analysed Curricula in the Universities Per Field (BA/MA/Integrated Studies⁷)

	U of Tartu	U of Tallinn	Tallinn U of Technology	<i>Total</i>
Law	2/4	3/2	1/1	6/7
PA / political science	1/7	3/4	1/2	5/13
Medicine	--/1/2	n/a	n/a	--/1/2
Education	8/16/2	5/23/1	n/a	13/39/3
Journalism	1/1	2/0	n/a	3/1
<i>Total</i>	12/29/4	13/29/1	2/3	27/61/5

For the year 2014, 68 curricula were included in the analysis (for breakdown by university and discipline see Table 2). By 2018, 9 new curricula had been added, however 44 of the previously identified curricula were still being taught, but new students were not being accepted (i.e. the curricula became inactive). Thus, 93 curricula were analysed in the study. The main reason for these changes in numbers lies in the curricula reforms. The changes that can be made in a curriculum from one year to the next can include small changes in the list of compulsory or elective

courses, or major changes including a complete overhaul of a curriculum, including its name, or consolidating curricula (e.g. curricula in the education discipline have been consolidated, resulting in a few wider curricula with several specialisations instead of multiple curricula with one specialisation). With most of the changes, a new version of a curriculum has to be adopted so that new students are accepted only to the most recent version of the curriculum, even though the students of previous versions may not have graduated yet. Because of this, the total numbers in Table 2 include inactive courses as well.

In 35 of them (out of 93), there were no courses related to ethics or professional integrity, 4 of the curricula (2 in medicine, 2 in law) included 2 courses each, others included one course. No real increase in ethics-related courses can be detected between 2014 and 2018; the new curricula are not more likely to include ethics courses than the older ones.

There are a few differences between universities. The University of Tallinn has more curricula with no ethics courses – 21 out of 43, compared to 12 out of 45 in the University of Tartu; whereas Tartu has considerably more curricula containing philosophical approach to ethics (see table 3). A higher representation of philosophy courses is most likely related to the University of Tartu's teaching philosophy on BA, MA and PhD levels, whereas the University of Tallinn offers it only on BA level. There are no significant differences between bachelor's and master's programmes: in both groups about 1/3 of curricula have no ethics courses. However, it has to be taken into account that the number of individual ethics courses was significantly lower, only 26, as several curricula included the same course. For example, most of the teachers' curricula in the University of Tartu and the University of Tallinn included the same course on professional ethics. In the University of Tartu, the same compulsory course was listed in 15 different curricula, in the University of Tallinn in 16 (see Table 4). The reason for this is rather simple: although teachers' curricula are highly differentiated based on the subjects⁸ and level⁹, they include a common module for all future teaching professionals, including a course

on professional ethics. The curricula of other disciplines, such as medicine, law, public administration, and journalism, are much less specialised or the specialisation is achieved through different electives and research.

Table 3. Form of Ethics Education by University

	U of Tartu	U of Tallinn	Tallinn U of Tech.	Total
1. No ethics-related courses	12	21	2	35
2. Ethics from a philosophical perspective	3	0	1	4
3. Combination of philosophical and professional approaches	7	1	0	8
4. Focus on professional ethics	21	19	1	41
5. Focus on professional ethics with applications within different contexts (societal expectations)	2	2	1	5
Total	45	43	5	93

Looking at the types of courses laid out in Table 1, several patterns can be detected. Firstly, all forms of ethics courses (types 2-5) can be seen in the five disciplines in all three universities (see Table 4). Group four – focus on professional ethics – was most represented, with 41 curricula, followed by no ethics courses (35), and a combination of philosophy and professional ethics (8). There is no correlation between the bachelor's/master's level programmes and the type of ethics courses. In 51 cases, the course was a compulsory part of the curriculum, in 7 cases it was an elective (19 and 7 individual courses respectively). The courses varied between 2 and 6 ECTS credit points. However, with an average of only 3.5 ECTS credits, ethics-related courses tend to be significantly less extensive than the compulsory core courses of the curricula that are usually 6 ECTS

credits. In addition, the courses of the last two types (type 4 and 5) tend to be more extensive in terms of ECTS credits (4-6 credits, compared to mostly 2-3 credits of the type 2 and 3).

Analysing the courses by disciplines, 35 curricula included no ethics related courses, including fields such as law, public administration, and education (see Table 4). The public administration/political science group is especially weak in teaching ethics: 15 out of 18 curricula had no ethics related courses. In law and education, the picture is more varied: almost all the forms of ethics education are represented.

There can be several reasons for not having an ethics course, as the curriculum managers pointed out. As one of them in the field of law stated, there are other much more important topics to be covered (in regard to graduates finding a job) and those take precedence within the limited space in the curriculum because before the law graduates become real attorneys, they have other opportunities to study professional integrity (outside the university). It may be a short-sighted view, as not all law graduates become attorneys, but can be employed as legal advisors within the private or public sector, start working for prosecutor's offices, etc. without knowledge of professional ethics or conflicts of interest. A second reason that was pointed out by a curriculum director in the field of journalism was that issues of professional ethics can be covered within other courses (e.g. the protection of sources and related ethics issues can be covered within courses dealing with reporting news and investigative journalism). In the field of law, several ethics-related issues are discussed within criminal and penal law (including corruption crimes), legal processes, etc. In these cases, the integrity issues are not disregarded, but rather dealt with in a piecemeal fashion. If there are no additional courses focussing on professional integrity issues, this approach may have two effects: firstly, it does not provide the graduates with a general overview of the topic; secondly, it does not reinforce some of the most important concepts and integrity issues, thus resulting in weaker achievement of learning outcomes.

Table 4. Form of Ethics Education by Curriculum

	Law	PA/PolSci	Med.	Educ.	Journ.	Total
1. No ethics-related courses	5	15	0	13	2	35
2. Ethics from a philosophical perspective	3	0	0	1	0	4
3. Combination of philosophical and professional approaches	2	0	1	4	1	8
4. Focus on professional ethics	3	1	2	35	0	41
5. Focus on professional ethics with applications within different contexts (societal expectations)	0	2	0	2	1	5
Total	13	18	3	55	4	93

Four curricula included courses on philosophy and ethics, but did not discuss professional ethics. Although we mostly expected to find moral philosophy centred approaches, the descriptions and learning outcomes of courses revealed a slightly wider picture. In addition to the expected references to philosophy of law and justice, the Bible, and Aristotle, the syllabi also mentioned literary works, European cultural values, organisational culture, and management styles. Thus, these courses seem to be more about providing a well-rounded higher education that leans slightly towards the liberal arts, rather than being clearly aimed at developing moral reasoning.

The next group of courses, combination of philosophical and professional approaches (type 3) (8 individual courses in total) included similar topics to type 2, ethics from a philosophical perspective, with an even bigger focus on moral philosophy, but there were also some references to professional ethics issues. For example, a curriculum in the field of education included a course on pedagogical ethics; its overview referred to ‘ethical issues in professional work’, but the examples used such keywords as patriotism, love, friendship, lying, disciplining, etc. Another

example comes from the field of public administration, where an introductory course on public administration used to include a class on administrative control and ethics (2014; not in 2018). Most of the courses in this category, however, follow a similar pattern: ethical theory, moral philosophy combined with some references to professional ethics. Depending on the discipline, the references to professional ethics included specifying ethical dilemmas through a role (e.g. the role of an attorney), client relationships (e.g. teacher *versus* students/parents/social partners) or specific cases where an ethical dilemma may arise (e.g. abortion, euthanasia).

The fourth form of ethics courses (41 curricula, 10 individual courses) are mostly focussed on professional ethics. Although there are still references to moral philosophy, the emphasis is clearly on professional ethics, ethical dilemmas within a given field, and client relationships. For example, a course in the field of law included not only a general introduction to ethics and professional integrity, but also a discussion on professional integrity in different roles (e.g. attorney, prosecutor, judge, notary public). A course in the field of education included topics such as professional integrity and ethical dilemmas as well as the teacher's role in the value development of children. However, these courses made no references to the wider societal perspective that was present in the remaining courses. The last five curricula had a strong focus on professional integrity and dealt with the societal perspective as well (type 5), e.g. journalism at the University of Tartu and public administration at Tallinn University of Technology. These courses clearly referred to such topics as public interest, serving the public, loyalty conflicts, conflicts of interest, and whistle-blowing and viewed the ethics dilemmas from a wider societal perspective, i.e. the course was not narrowed down to specific client relationships.

VI. DISCUSSION AND CONCLUSIONS

Analysing 93 curricula in five disciplines in Estonian universities, we observed that although a significant number of curricula include a course

on professional ethics, the topics are clearly related to the narrower view of professional ethics through client relationships. The preconditions of educating ethical professionals seem to be present, with the focus on serving the client. Only a few curricula referred to serving the public or society or understanding conflicts of interest as a key component of the course. Although the government has established standards for higher education, which include learning outcomes concerning ethics, 35 curricula included no courses on this topic. Of course, we cannot rule out the possibility that ethics issues are not reflected in the learning outcomes of the courses and are simply discussed one by one as side-notes to different topics. The main conclusion, however, is that the university curricula prepare their graduates mostly for one narrow career path, at least when it comes to ethics issues.

Since all these disciplines have well-established professional ethics in Estonia, why is ethics education not embedded into academic education? Firstly, because of a lack of tradition to teach the topics. The universities and curricula that have high-level courses in professional ethics also deal with professional ethics (or corruption) research (law at the University of Tartu) or have a historical background in teaching professional ethics (journalism and medicine at the University of Tartu). If there are no professors interested in the field, the curricula may not include the topic. There are also limits to hiring practitioners as visiting lecturers: the lack of experts combined with heavy workloads might make it impossible to hire a competent teacher. This situation is rather typical of small states (like Estonia): due to the lack of workforce, there is a limited number of experts in any given area and a limited number of research areas that can be covered (Sarapuu 2010, 37). Secondly, there may be a lack of awareness concerning professional ethics in regard to curriculum development. The groups that seem to lack ethics courses are rather specific: public administration/political science curricula at the University of Tartu and the University of Tallinn and law curricula at the University of Tallinn and Tallinn University of Technology. As this seems to be a systematic

occurrence in these groups, it might reflect the priorities of the institutes and/or programme managers responsible for the development of the curricula.

In short, teaching ethics within Estonian university curricula on both the bachelor's as well as the master's level is seen within the confines of one profession. There are only a few examples of the wider framework of society or different roles being taken into account. The courses that have a general focus on professional integrity show the differentiation between private/personal and public/professional roles. Several courses even mention conflicts of interest within the specific profession. Only one course mentions corruption and corruption prevention.

Although the overall Estonian higher education ideology seems to involve as much flexibility as possible – through electives, minor specialisations, continuing in a master's programme not related to one's bachelor's degree, etc. – this flexibility has not reached the ethics-related issues. Disciplines seem to be rather isolated in their approach to ethics education, and there is no sign of interdisciplinarity that has become rather common in the job market and employability discussions. In a way, lawyers seem to be most prepared, simply because they have topics of corruption crimes covered in their curriculum, in addition to the professional ethics issues (it is not always the case though). This lack of interdisciplinarity might result in ethical misconduct if a professional encounters dilemmas that fall outside the client relationships or take place in a different context (e.g. public sector).

The problem remains: if this narrower view of professional ethics may not suit the modern world (and especially the public sector) with its changing career paths, overlapping roles and identities, what should be done to solve this issue?

It would be easy to say that if the public sector and public service as well as private companies are willing to employ people with a variety of educational and professional backgrounds (who are not in their 'natural habitat', so to speak), they should be prepared to train them on relevant

integrity issues. It is the task of the institutional training system to guarantee that all employees know and implement the rules, which of course creates a significant workload and financial burden for the training system, especially in the context of small organisations. However, it is clear that some of the professionals are employed exactly where they are meant to be, e.g. teachers and doctors, but their professional integrity training still does not take into account the framework in which they will act. It does not take into account that, for example, the ethical dilemmas and corruption risks of a teacher might go beyond students and parents to contracting services and goods from private sector companies. Thus, a teacher is seen just as a representative of a narrow profession, and not as a player in a more complex system of societal relationships. Of course, we cannot assume that all teachers or doctors will negotiate contracts, thus the more specific issues do not need to be included in the curriculum but should rather be dealt with through the training system (as in the case of journalism graduates who end up working for the public sector). As there are not many employees that need training, the desired result can be achieved where a person enters public sector employment. However, providing a basic understanding of social responsibilities, different contexts or even public sector and public service principles during professional education might help to decrease misconduct and corruption in the future.

The governmental requirements stated in the higher education standards are somewhat vague. They require that graduates should understand what consequences their activities have on society, but do not require understanding basic differences between private and public sector integrity or between different professions. An issue we want to raise is the role and responsibility of universities and people responsible for curricula to include public and professional ethics courses in academic education and preparation for future working life. The social situation on national as well as international level has become more complex, and focusing on delivering knowledge and skills and not paying attention to ethics

education might have consequences in the future. Thus, besides research and teaching, carrying out the ‘third mission’ of universities through solving social problems becomes even more crucial.

There is no reliable and valid data on the impact of ethics education (in Estonia). Although the Tallinn University of Technology asks in its alumni feedback survey to evaluate their knowledge of professional ethics and the Estonian criminal police data reveal that about 1 in 4 suspects in corruption cases has a tertiary education (23% compared to 41% of employed people) (Politsei- ja piirivalveamet 2017, 40), this data is not sufficient to draw any conclusions. We do recognize the need to research and analyse this aspect of ethics education further in the future, as the teaching methods and effectiveness of ethics education play a crucial role in establishing a basis for ethical reasoning and behaviour.¹⁰

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NOTES

1. As Frensdreis and Vertz (1988, 81) point out, not all approaches to defining professions imply the requirement for codes of ethics, with sociological approaches mostly ignoring the need, while Koehn (1994, 3) argues for philosophical approaches admitting the role of professional integrity or a distinctive ethos devoted to a particular good.

2. A bachelor’s degree usually takes 3 academic years, 180 ECTS credits and a master’s degree 2 years, 120 ECTS credits. The exception is medical curricula and some of the education-related curricula that require 5-6 years of studies (300-360 ECTS credits) before graduation. ECTS or European Credit Transfer and Accumulation System refers to the standard for comparing study attainment and performance of students in higher education in the European Union. In the Estonian higher education system, 1 ECTS credit = 26 hours of work (in different EU countries it may be between 25-30 hours).

3. Tallinn University of Technology is the only university that asks about “knowledge of professional ethics” in its alumni feedback survey. As Tallinn University of Technology curricula include only two out of the five relevant disciplines, we cannot draw any general conclusions.

4. The professions within the law discipline are more specialised: Estonian Bar Association, Chamber of Notaries, judges, and prosecutors all have their own ethics codes as well as ethics councils.

5. Other public universities, e.g. the Estonian University of Life Sciences, the Estonian Academy of Arts, etc. do not teach the relevant disciplines.

6. The requirements for doctors are part of a larger governmental regulation that also applies to veterinarians, pharmacists, midwives, nurses, architects, and engineers.

7. Integrated studies refers to a curriculum of 5 or more years that does not offer a separate bachelor's degree, but at the end of the programme, awards a master's degree, e.g. in the field of education, or a degree in medicine (MD).

8. For example, humanities, languages, math and physics, natural sciences, etc.

9. For example, pre-primary, primary, lower secondary, upper secondary.

10. The writing of this article was supported by the Estonian Research Council grant PUT1461. The authors thank the anonymous reviewers for their feedback as well as discussants from the SEAS conference (Vilnius, 2018) and the EGPA conference (Toulouse, 2015).

Appendix 4

Publication IV

Saarnit, L., Sarapuu, K. (2024). Corruption and Country Size: Insights from Small State Studies. *Halduskultuur – The Estonian Journal of Administrative Culture and Digital Governance*, 22 (2), xx-xx. (ETIS 1.1)

Corruption and Country Size: Insights from Small State Studies

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Abstract

An elaborate body of academic debate deals with public sector corruption as a detrimental social problem. Considerable attention has been paid to the contextual factors of corruption and the role of wider societal norms and institutions in enhancing or deterring corrupt practices. However, there is only a limited amount of knowledge available on one factor – the size of countries. Are small or large countries more prone to corruption? There are a few studies that aim to clarify this issue, but the findings are contradictory. The aim of the article is to turn to a stream of social science research specifically interested in country size – small state studies – and to explore the relevance of this knowledge for understanding public sector corruption. The analysis shows that country size is a significant contextual characteristic that affects economic, political and socio-cultural factors of corruption. The article raises the need for further studies into causal mechanisms of size by including more small states into international comparative research, turning attention to qualitative comparative studies, and taking a closer look at the link between socio-cultural factors of corruption and country size.

Keywords: corruption, country size, context, population, small states

1. Introduction

Public sector corruption, most commonly defined as the abuse of public or entrusted power for private gain (Andersson and Anechiarico 2019, 117; Rose-Ackerman and Palifka 2016, 9) is condemned for its damaging effects on social relationships, economic development, and political stability. Shacklock et al. (2016, 1) argue that corruption “undermines the fairness, stability and efficiency of a society”. Corruption has been shown to decrease wealth, investments and trading (Lambsdorff 2006) with the UN (2018) estimating the cost of corruption to be at least 5% of global GDP. Andersson and Anechiarico (2019, 7) emphasize corruption’s detrimental effect on the “integrity of governance, to trust in democratic processes, and to effective decision making and administration”.

Numerous recent books, research papers, and indices have aimed to identify the level of corruption in different countries, insisting that we must understand the causes and effects of corruption for an effective defense of public integrity (Andersson and Anechiarico 2019, xi). The debates have been characterized by the call to bring in a wider context into the studies. Several authors have emphasized the need for empirical analyses focusing on macro-level, systemic and contextual factors surrounding corruption (for example, Fernando and Bandara 2020;

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Persson et al. 2013; Mungiu-Pippidi 2006). In other words, next to the perspectives explaining corruption as a function of "bad apples" (related to the characteristics of individuals) or "bad barrels" (deriving from the characteristics of organizations), there is a call for more empirical research that discusses the characteristics of "bad larders", i.e. the impact of the environment where the "apples" or "barrels" are located (Fernando and Bandara 2020, 2; Gonin et al. 2012). In this view, the factors for corruption go beyond personal and organizational traits and include wider societal norms and institutions. As Doig and McIvor (1999, 659) argue, corruption as an "activity motivated by self-interest, violating the binding rules of distribution", always takes place in a specific context, and the "rules of distribution refer not only to the letter of the law, but also to norms recognized as binding by society and/or to the system's official norms and operational codes."

Research on corruption has taken considerable interest in these contextual variables – there are numerous empirical and theoretical studies on how factors such as economic development and openness to competition as well as democracy, culture, geography and history, regulatory quality, etc. relate to the level of (perceived) corruption (ElBahnasawy and Revier 2012; Lambsdorff 2006; Seldadyo and de Haan 2006). However, there is one contextual factor that has escaped solid explanations thus far – the size of countries. Are small or large countries more prone to corruption? Why? There are a few studies that aim to shed light on this issue, but the findings are contradictory and raise several methodological questions. Theoretical conceptualizations revolving around the economies of scale allow to make arguments in both directions and the function of size has been put forward as an ultimately "empirical issue" (Amin and Soh 2019, 4; Knack and Azfar 2003, 5). While the respective empirical studies are still scarce, the ones exploring the issue tend to conclude that the occurrence of corruption seems to increase with the size of the country, i.e. to argue that larger countries are more disposed to being corrupt (Amin and Soh 2019; Root 1999; Treisman 2000).

At the same time, however, there exists another stream of social science research that takes an active interest in the impact of country size. This knowledge, which can be gathered under the label "small state studies", directs attention to the increased corruption risks in smaller countries. The studies relying on the size of populations as the key variable (for example, Baldacchino and Wivel 2020; Briguglio 2018a; Corbett and Veenendaal 2018) show that a small population shapes the governance of countries through the shortage of resources, most of all human resources, and the special "social ecology" that comes with it (Jugl 2019; Sarapuu 2010). Corbett and Veenendaal (2018, 176) argue that "close connections and overlapping public and private relations between citizens and politicians in small states generally translate into particularistic politics, among which clientelism, patronage, and nepotism are common."

Nevertheless, these two streams of research have evolved rather independently from each other. Drawing on the potential value of knowledge offered by the small state studies, the article at hand aims to take an in-depth look into the studies in order to explore their relevance for corruption research. Guided by the academic debate on the factors of public sector corruption, the article aspires to answer two questions:

- What do small state studies say on the impact of country size regarding the explanatory factors of corruption?
- What are the potential implications of this knowledge for the research on public sector corruption?

In order to synthesize knowledge from two very wide academic debates, the analysis proceeds by, first, focusing on the stream of corruption literature that discusses the role of context in public sector corruption and, second, based on this overview, explores the key texts in small state governance to distil the knowledge relevant for understanding the function of states' size in public sector corruption. The article starts with a look into existing corruption research and gives an overview of the key contextual factors brought forward. Secondly, population size as a variable in corruption research is discussed. Third, small state studies are introduced and the portrayal of the contextual factors of corruption in small state studies is explored. The last section focuses on the implications of bringing the two streams of knowledge together and their potential synergy in the field of corruption research. The analysis shows that country size is a significant contextual factor affecting economic, political and socio-cultural factors of corruption, but its exact function is undecided. Thus, advancing research on the link between country size and corruption is both an empirical and a theoretical endeavor. In pursuing these aims, small state studies offer several seminal insights.

2. Contextual factors in corruption research

There is extensive international discussion on the factors that explain the existence and rate of corruption, ranging from single case studies to large N quantitative analyses. As the list of the factors analyzed is long, researchers have classified and grouped them in a number of ways. Some authors divide the factors that shape corruption into three or four principal groups (e.g. Ata and Arvas 2011; ElBahnasawy and Revier 2012; Seldadyo and de Haan 2006), others into as many as nine groups (e.g. Lambsdorff 2006). In this paper, similarly to Ata and Arvas (2011) and ElBahnasawy and Revier (2012), we rely on a division of explanatory factors into three core groups – economic, politico-administrative, and socio-cultural. The groups cover all the factors discussed under various categorizations and provide a functional analytical anchor for the study.

First, there are numerous theoretical and empirical analyses of *economic factors* as potential determinants of corruption. On a theoretical level, most of the explanations circle around the concept of competition: the more open the economy is and with fewer barriers it functions, the better in terms of corruption. Several factors have been shown to correlate with low levels of corruption and are proposed to reduce incentives for corruption. The most basic determinant has been argued to be the wealth of the country, determined by GDP per capita. Several authors (Damania et al. 2004; Serra 2006; Treisman 2000) have concluded that wealth is a good predictor of the level of corruption, with wealthier countries being less corrupt. One of the reasons behind it might be the ability of the country to invest more resources into anti-corruption policies; another may be related to better education and literacy in the society, which contribute to greater awareness and thus to a better likelihood of discovery (ElBahnasawy and Revier 2012, 314). The same has been claimed about general economic freedom (Gurgur and Shah 2005; Park 2003; Treisman 2000), openness to trade (Ades and Di Tella 1999; Treisman 2000; Knack and Azfar 2003) and greater import share (Herzfeld and Weiss 2003; Treisman 2000). Income distribution, however, has not been shown to have an important effect on corruption (Park 2003; Brown et al. 2011).

On the other hand, low wages in the public sector (compared to the private sector) and an abundance of natural resources (especially oil and gas) have been suggested to increase the

likelihood of corruption. In case of public sector wages, several authors (Van Rijckeghem and Weder 1997; Alt and Lassen 2003; Rauch and Evans 2000) have suggested that comparatively lower wages may increase the motivation for bribes, as the cost of a bribe (losing a job) seems lower, while the benefit seems higher. However, not all empirical studies agree with this conclusion, stating that the relationships between wages and level of corruption are not always statistically significant (Gurgur and Shah 2005; Treisman 2000). Additionally, natural resources, their mining and export create opportunities for rent-seeking, thus increasing the potential level of corruption (Tornell and Lane 1998; Leite and Weidmann 1999).

There is no agreement on either the theoretical or the empirical level on how the size of the public sector (in terms of government expenditure and revenue relative to the GDP; e.g. Seldadyo and de Haan 2006) influences the level of corruption. Some authors assume that smaller public sectors create a deficit in providing public services, thereby creating temptation for bribes, whereas others argue that larger public sectors create more opportunities for corruption (Seldadyo and de Haan 2006, 14), especially through rent-seeking behavior as the public sector is a significant buyer of goods and services (ElBahnasawy and Revier 2012, 315). Lambsdorff (2006, 5) points out that there is also the question of reverse causality, as "corrupt governments have difficulty obtaining funding, be it through taxation or loans. This lack of resources then forces them to operate on a rather small budget."

Second, the literature brings forward *the politico-administrative factors*. Seldadyo and de Haan (2006, 20) divide them into two main groups. First, political and civil liberties associated with democracy, and second, administrative characteristics, including decentralization and federalization. When it comes to the democracy-related variables, there is a general agreement that democracy reduces corruption (Brunetti and Weder 2003). As Kunicová and Rose-Ackerman (2005) explain, political participation and competition, and democratic control mechanisms enable the public to monitor the elected officials' activities and, if needed, remove them from the office. However, as Lambsdorff (2006, 10) points out, the effects of democracy on corruption are not immediate, nor are they present in "half-hearted" democracies. In addition, democracies are seen as more stable forms of government, and (political) stability as a factor has been shown to reduce the potential level of corruption (Leite and Weidmann 1999; Lederman et al. 2001; Serra 2006; Park 2003), as in an unstable political situation officials tend to behave more opportunistically to take advantage of their (possibly short) time in office. Contrary to the empirical findings, ElBahnasawy and Revier (2012, 317) propose that stability may also have the opposite effect, as it allows officials time to build up corrupt relationships.

Strong rule of law and well-defended political freedoms have been shown to decrease corruption (Kaufmann et al. 2006; Damania et al. 2004). In short, if politicians and public officials expect corrupt activities to be detected and sanctioned, they may be less tempted to engage in them. In addition, as Rauch and Evans (2000) point out, Weberian principles of public administration (especially meritocracy) lower corruption due to the higher quality of bureaucracy (see also Gurgur and Shah 2005; Brunetti and Weder 2003). Multiple analyses (Lederman et al. 2001; Ali and Isse 2003; Gurgur and Shah 2005; Fisman and Gatti 2002) have shown decentralization to have a reducing effect on corruption, whereas federalization has the opposite effect (Kunicová and Rose-Ackerman 2005; Damania et al. 2004; Treisman 2000; Goldsmith 1999).

Third, *socio-cultural factors* are the smallest group, but the most difficult to quantify. Furthermore, quite often the direction of causality is not clear (Lambsdorff 2006). The main cultural factors that have been shown to have a reducing effect on corruption include Protestantism (La Porta et al. 1999; Treisman 2000; Serra 2006; Chang and Golden 2007, a higher proportion of women in representative institutions and the work-force (Swamy et al. 2001), as well as secular-rational values in the society (Sandholtz and Taagepera 2005). Protestantism is seen as beneficial due to its focus on individualism and a clear separation of church and state, whereas secular-rational societies put more emphasis on impersonal values. Ethnic fragmentation and conflict, on the other hand, are seen as factors contributing to corruption (La Porta et al. 1999; Lederman et al. 2001) due to the bureaucrats’ potential loyalty to their ethnic group or family instead of public interest. Last, colonial heritage is seen as having mixed effects on corruption. Some authors claim that colonial heritage results in more corruption (Gurgur and Shah 2005; Tavares 2003), whereas others show differences between various backgrounds, arguing that former British colonies have lower corruption compared to the Spanish and Portuguese ones (Herzfeld and Weiss 2003).

It should be emphasized that there is a considerable overlap between the causes and effects of corruption (e.g. low socio-economic development), and on its own, no factor is a good indicator of corruption to be used in isolation from others. Furthermore, the lines between the groups of factors can be arbitrary. For example, the wage of civil servants has been classified as an economic (ElBahnasawy and Revier 2012) or bureaucratic/regulatory determinant (Seldadyo and de Haan 2006); regulatory quality has been discussed as an economic factor (e.g. limits to economic freedom, ElBahnasawy and Revier 2012; Seldadyo and de Haan 2006) or as a bureaucratic factor (Lambsdorff 2006); natural resources have been grouped among the economic (ElBahnasawy and Revier 2012; Seldadyo and de Haan 2006) and geographical/historical factors (Lambsdorff 2006). Nevertheless, the division of the factors into three groups provides a good framework for reviewing the literature on small states with regard to the potential impact of country size. This will be done after discussing the presence of size as a variable in corruption research.

3. Country size as an explanatory factor

Country size as a variable is addressed in a handful of publications in the field of corruption research. The authoritative literature reviews (e.g. Lambsdorff 2006; Seldadyo and de Haan 2006; Enste and Heldman 2017) usually refer to a few key papers on the issue – Root (1999), Treisman (1999), Fisman and Gatti (2002), Knack and Azfar (2003), and, more lately, Mocan (2008). These are large N studies, based on the quantitative analysis of various factors of corruption, mostly using Transparency International’s Corruption Perception Index. The size of population is included in several ways in these studies – as one of numerous variables being studied, a descriptive variable or a control variable. Quite often, the main research questions or hypotheses are not related to the effect of country size, but to other factors, such as (fiscal) decentralization, trade openness, etc. When the effects of size are explicitly addressed, the authors usually point out the potential positive as well as negative effects.

Most often, the overviews of the effects of population size on corruption refer to publications claiming that smaller countries are less corrupt (e.g. Root 1999; Treisman 1999; Fisman and Gatti 2002). For instance, one of the key texts by Fisman and Gatti (2002) focuses on

fiscal decentralization and its relationship to corruption. The authors conclude that “fiscal decentralization in government expenditure is strongly and significantly associated with lower corruption”, using population, civil liberties, GDP and government size as control variables. Similarly, Treisman (2000, 405) uses population as a control variable when analyzing such factors as the legal system, religion, colonial background, political freedom, economic and social development, public service salaries and political instability. Again, he does not link population directly to the level of corruption, but creates a longer causal chain. Treisman (2000, 432) argues that countries with larger populations and areas “are both more likely to be federal and to be relatively more corrupt (perhaps because their economies are less exposed to competition from imports)”. Wei (2000) discusses “a natural openness” of a country based on its population and distance from the world trading centers, concluding that bigger and far-away countries are less open and more corrupt, as smaller and more open countries are influenced by market discipline and are thus forced to have good governance. Using microdata to analyze the determinants of the probability of being asked for a bribe, Mocan (2008) concludes that the probability increases not only with population size but also with living in a large city (over 1 million inhabitants). The latest study by Amin and Soh (2019), which relies on survey data from 135 countries concerning firms’ experience with corruption, concludes that corruption is positively correlated with country size and is higher in larger countries.

Knack and Azfar’s (2000, 2003) research, however, reaches the opposite conclusion. Their main focus is on examining previous publications, which “conclude that larger [countries] tend to have governments that are more corrupt than governments in smaller nations” (again, referring to Root 1999; Treisman 1999; Fisman and Gatti 2002). Knack and Azfar (2003, 9) state that this is the result of sample bias: they claim that “only the well-governed countries among small nations are represented in the Transparency International index, and only the large nations among the poorly-governed ones are represented.” Thus, with the inclusion of more badly governed small countries the correlation between population size and corruption would disappear. Yet another group of authors concludes that population size is not significant in determining the level of corruption. Tavares (2003) analyzes the relationship between foreign aid and corruption, including population among the variables, but finds it insignificant. A later analysis by ElBahnasawy and Revier (2012) uses multiple variables, including GDP per capita, openness to trade, natural resource endowment, religion, etc., with population among them. Their “results provide strong evidence that a country’s population size does not seem to influence perceived corruption” (ElBahnasawy and Revier 2012, 324).

The above discussion shows that the existing literature on the relationship between the size of a country and corruption is not only limited but also controversial. The first and the most obvious of these controversies is the lack of agreement on the effect of population size on the level of corruption – whether smallness fosters corruption, discourages it or is insignificant. Second, there is a lack of discussion on the definition of country size – it is not clear what is meant by small or large in corruption research. If the thresholds exist, they are not thoroughly justified. Knack and Azfar (2003) explain that only two out of 30 countries with populations under one million are included in Transparency International data, and they use this line to show that excluding those countries from the dataset considerably alters the conclusions. However, no other explanation is given why the level of one million might be important in terms of corruption. Mocan (2008) uses 50,000 and 1 million as cut-off points for city sizes,

but does not define any threshold for the country size. Other studies do not define their cut-off points at all (ElBahnasawy and Revier 2012).

Third, the factor of size is under-theorized – there is a superficial discussion on the function of size and how it influences the level of corruption. For example, one of the most often cited works by Knack and Azfar (2003, 4), whose theoretical discussion focuses mostly on the concept of optimal size, limits its discussion of smallness to citing Jalan's (1982) claim that "smaller nations benefit from greater social cohesion and fewer vested interests." In addition, they refer to the economies of scale and its possible influence on the provision of public services, rent-seeking as well as conflicts of interest (Knack and Azfar 2003, 5). Overall, the existing literature is centered around economic interpretations, concepts and variables of size: Root (1999) discusses the economies of scale (cited by Knack and Azfar 2000, 5), Fisman and Gatti (2002) focus on fiscal decentralization, Tavares (2003) on foreign aid, and Knack and Azfar (2000) on foreign investment and trade intensity.

Fourth, there is the problem of using decentralized units as proxies for small countries. For example, in the overview on determinants of corruption Lambsdorff (2006) discusses population size under the heading "decentralization", together with such factors as the share of subnational expenditures, federalization, and unicameral vs. bicameral parliaments. The paper by Fisman and Gatti (2002) that is often used to demonstrate that smaller states are less corrupt (ElBahnasawy and Revier 2012; Lambsdorff 2006; Seldadyo and de Haan 2006), actually deals with fiscal decentralization. Decentralized units in a large state, however, do not equal small states, even though the basic statistics (population, area, budget, etc.) might be similar.

4. The impact of country size according to small state studies

Small state studies

The field of small state studies has seen considerable growth in recent decades. Numerous edited collections and empirical analyses have been published discussing the relevance of country size, the special characteristics of small states, and the challenges related to the limited scale of political and administrative systems (for example, Baldacchino and Wivel 2020; Briguglio 2018a; Corbett and Veenendaal 2018; Briguglio et al. 2021; Joensen and Taylor 2021). While the most common variable used to categorize countries is the size of their populations (Briguglio 2018b; Corbett and Veenendaal 2018; Jugl 2019), the applied definitions and thresholds have depended on the research interest. For instance, the discipline of international relations conceptualizes small states mostly as "small powers" – i.e. those with limited capabilities and not able to change the terms of policy-making on the international arena (Maass 2009; Thorhallsson and Wivel 2006). Size becomes relative in this perspective. However, in the governance discipline with its interest in the internal matters of governing, a more absolute stance is taken. In this perspective, the limited population size is the key defining feature of small countries (Sarapuu and Randma-Liiv 2020). Jugl (2019, 119) argues that for analyzing the impact of size on the performance of governments, the size of a population is the most appropriate characteristic, because "it is a proxy for the number of social relations in a society, the human resource pool, the heterogeneity of citizens' and bureaucrats' identities and preferences and the demand for public goods and services."

Despite the growing interest in the impact of country size, no clear dividing line between small and large (or medium-scale) countries has emerged. In a number of studies, small states have been defined as those with a population of one million or less (Anckar 2020; Corbett and Veenendaal 2018; Raadschelders 1992). The Commonwealth Secretariat and the World Bank have employed a threshold of 1.5 million. Bräutigam and Woolcock (2001) use a threshold of five million. Even within the recent edited collections, different cut-off points have been applied in individual chapters (see e.g. Briguglio 2018a; Baldacchino and Wivel 2020). Due to the arbitrary nature of dividing lines, several scholars suggest conceptualizing the issue through “a continuum of size” (e.g. Bray 1991, 13; Bray and Packer 1993, 91) – the smaller the population gets, the more likely are the states to present specific characteristics.

Regardless of various conceptualizations of size and the fact that small states differ in their development, histories, governance models, etc., the studies share a common conviction that the size matters. The explanations for the function of size revolve mostly around “the economies of scale” and, more specifically, lacking economies of scale in countries with small populations (Jugl 2019). Through missing economies of scale, the small population size has an impact on the functioning of the government, the private sector as well as the non-governmental sector. There are limits to specialization and a small client-base for various products and services. At the same time, small countries face the need to maintain the functions of a sovereign state and satisfy the needs of citizens for different public services (Sarapuu and Randma-Liiv 2020). Consequently, the size of the population is a core characteristic that has an impact on all spheres of life. In the next sections, the representation of the three groups of explanatory factors in the small state studies is explored.

Economic factors

Small countries are very diverse and geographically located all over the world. The World Bank, which has a special focus on the economic development of small states (it lists 42 countries with populations under 1.5 million), maintains that despite their diversity, small states share common economic challenges. “Due to their small population and economic base, these countries are particularly vulnerable to exogenous shocks such as economic shocks, natural disasters, and climate change. With limited economic opportunities and significant migration, they often face capacity constraints.” (World Bank 2022, 3). Many small states are islands and several of them archipelagos (20 of 39 countries with populations under one million in 2020; Baldacchino 2020, 71). In addition to smallness, these countries must also deal with islandness, territorial fragmentation, remoteness and insularity.

Different studies on small countries put forward similar arguments on their economic features. Small states are characterized by a small market size and a small client base, the absence of economies of scale, lacking competition in the domestic markets, limited natural resource endowments, limited diversification possibilities and small private sector elites (Briguglio 2018b; Baldacchino 2020). Small states tend to have proportionately larger governments (Bräutigam and Woolcock 2001, 4). The markets tend to concentrate around a narrow range of products and services that generate the majority of export sales (Baldacchino 2020, 74). These characteristics make small states dependent on international trade and vulnerable to the fluctuations beyond their borders. Briguglio (2018b, 11) concludes that “the main economic features shared by all small states is their limited human and physical capacity, their inability

to reap the benefits of economies of scale in certain forms of production, their relatively high degree of trade openness and their high exposure to external economic conditions beyond their control.” However, despite the constraints described above, many small states do economically remarkably well and are characterized by high levels of wealth. In terms of GDP per capita, several small states are in the top 10 and several more in the top 30 of the world (Anckar 2020, 48–49). At the same time, there are also a number of small states that lag behind and struggle economically, belonging among the states with the poorest scores. By reviewing four different measures of “political productivity” illuminating the performance of small states in economy, health, human development and education, Anckar (2020, 49) concludes that “small states are everywhere and at all levels.”

The core economic characteristics of small states link with the key factors put forward in corruption research. Some of the characteristics can be expected to have a mitigating effect on corruption – greater economic freedom, openness to trade and bigger reliance on imports should decrease corruption risks. To attract FDI and development assistance, small states may be forced to improve their governance structures and practices, especially control instruments and financial accountability, thus also enhancing anti-corruption measures (Bräutigam and Woolcock 2001; Larmour and Barcham 2006). However, the lack of diversification, small domestic markets and limited competition may result in large sections of economies being controlled by small business elites. Business interest groups assume “greater political clout and leverage in the corridors of local power” (Baldacchino 2020, 73–76). The lack of competition may enhance rent-seeking and thus result in a further decrease in economic efficiency and growth and an increase in misallocation of resources and loss of government revenue. The close connection between politics and commerce creates opportunities for corruption (Findlay 1997, 36).

Politico-administrative factors

Politico-administrative factors can be divided into two sub-groups – political and administrative. First, with regard to the political factors, the small size of a country is expected to have an impact in two opposing directions, both to potentially foster democratic decision-making and to inhibit it. On the one hand, it is expected that the small scale of a country increases transparency and brings politico-administrative decision-makers closer to the people, making them more responsive and accountable (Veenendaal and Corbett 2015). People in small states are more or less known to each other so that ministers, high government officials, influential businesspersons or politicians may be more easily accessible, either formally or informally (Bray and Packer 1993; Sutton 1987). This context is expected to make politicians more representative of their electorates. However, evidence shows that small states’ reality is not necessarily so conducive to democratic governing and rather provides a “mixed blessing” (Larmour and Barcham 2006; Veenendaal and Corbett 2015, 543).

The same characteristics that are expected to make governing more responsive and accountable may lead to personality politics overriding other considerations and to patron-client relationships, corruption and nepotism (Baldacchino 2012; Corbett et al. 2021). Interest groups may have a high impact on policy-making, especially if there are few strong industrial sectors in the country or no critical mass of institutionalized interest groups that

could balance each other in the political discourse (Baldacchino 2020, 73–76; Larmour and Barcham 2006, 178–179). Power and influence tend to become concentrated in the hands of a few (Baldacchino 2020, 75; Corbett and Veenendaal 2018, 177). This may lead to the capture of the state and domination of those who are the loudest, the richest or the closest to the politicians. Despite the small state context allowing for more direct participation in the political process, minorities remain marginalized (Veenendaal and Corbett 2015, 539). All these problems may be aggravated by the weakness (or even absence) of independent media whose functioning is constrained by missing economies of scale (Ólafsson 2020; Larmour and Barcham 2006, 179; Veenendaal and Corbett 2015, 542). Nevertheless, “against all odds” (Corbett and Veenendaal 2018), the majority of small states are democratic and represent remarkably stable democratic regimes (Anckar 2020, 44–45). The forces emanating from the limited scale apparently balance each other and guide the states towards a compromise version of responsiveness and concentration of power.

The small size of a country has a direct impact also on its administrative organization and public service. There are two core implications of lacking economies of scale in this respect. First, the small size of public organizations puts limits on the division of labor by constraining specialization and pushing public institutions towards multi-functionality (Bray 1991; Bray and Packer 1993; Farrugia and Attard 1989; Randma-Liiv 2002). Since public service provision is gripped by diseconomies of scale, there is constant pressure towards a centralization of public functions. Consequently, small states are likely to have fewer government organizations, hierarchical levels and positions, and less distance between the executives and the lower levels of organizations. Multi-functionality occurs both on the level of individual officials and entire organizations. One small state official is often in charge of several policy issues or phases in the policy cycle, which in larger countries are catered for by separate units (Farrugia 1993; Thorhallsson 2000, 81).

Second, the classic values of public administration – such as transparency, predictability, neutrality and equality – assume formalization through rules and standardization. However, the everyday reality of small states – in the form of higher personalism, close social relationships, and multi-functionality – steers small administrations away from rigid rule-following and towards adopting informal working procedures and flexibility (Randma-Liiv and Sarapuu 2019; Raadschelders 1992, 28). A less institutionalized system allows for a higher degree of personal intervention and a corresponding *ad-hoc* approach to issues, but also makes public officials more easily personally identifiable in connection with the specific decisions and their consequences (Sutton 1987). The implications of the tendency towards informality are double-edged. On the one hand, informality and flexibility allow small states to cope with the constraints of scale and to prioritize on a running basis. On the other hand, the reliance on informal work arrangements makes it more difficult to apply hierarchical and standardized organizational practices and may result in problems of transparency, barriers to control and accountability (Sarapuu 2010).

Consequently, strong rule of law, Weberian values in public administration, and merit systems as deterrents of corruption may be difficult to achieve in small states (Bräutigam and Woolcock 2001, 5). Centralization, informal coordination and communication, limited expertise, multi-functionality and high personalism create a favorable environment for corruption. Due to these traits, governing systems can escape public, political and administrative control

(Warrington 1992, 228). Even when the formal anti-corruption institutions are in place, they may turn out to be “hollow” in practice and fail to do what is expected (Larmour and Barcham 2006, 179). Nevertheless, these problems may be balanced by higher transparency and personification accompanying the small scale.

Social factors

As becomes apparent from the above, one central finding of small-state studies is that these countries are characterized by a particular social ecology. The small size of the social field leads to closely knit communities with highly personalized relationships (Benedict 1966; Bray and Packer 1993; Farrugia 1993, 221; Lowenthal 1987; Randma-Liiv 2002; Sutton 1987). When the social field is small, multiple roles have to be played by relatively few individuals (Benedict 1966). That leads to particularistic social relations that extend over time and are affectively charged. A person’s activities and performance are not evaluated based on some universal criteria, but based on *who* he or she is (ibid.). Lowenthal (1987, 35) characterizes small state relationships with the term “managed intimacy” – as their inhabitants meet over a long period of time in different role-relationships, they learn to get along with one another. Furthermore, as the social and economic fabrics of small states tends to be more fragile than in larger states, their inhabitants usually share a common sense of vulnerability (Lowenthal 1987), and a strong national and cultural identity (Sutton 1987, 18-19; Bray 1991). Many of the small states belonging to the SIDS group, are former colonies (Anckar 2020).

In the public sector, close social relationships can be expected to lead to some specific traits and behavioral patterns. Public officials have to operate professionally within a network of people with whom they are personally acquainted, related or connected. The separation of different roles may be difficult or even unrealistic (Baker 1992, 18), thus creating numerous conflicts of interest and the pressure to maintain social relationships over objective and neutral decision-making. As differing opinions can be suppressed by social and cultural sanctions (Baldacchino 2012), speaking up against corruption may not take place (Larmour and Barcham 2006, 180). Nevertheless, the same characteristics that facilitate corruption may also curb it. Although small states can be both homogeneous and heterogeneous in their ethnic, linguistic, religious or racial composition, they tend to be more cohesive (Briguglio 2018b, 11) and trust-based (Jugl 2019). The enhanced personal level trust and high public service motivation deriving from the strong sense of national identity can partly substitute the need for control and reduce communication and monitoring costs.

The above discussion on the three groups of factors is summarized in Table 1. As we see, the special characteristics of small countries can work in both ways – enhancing the corruption risk and reducing it. Although the picture seems similar to the one in corruption research – the theoretical generalizations do not give an unequivocal explanation of the function of countries’ size – three important findings emerge: the size of the population is a critical characteristic of countries; countries with small populations are characterized by special traits of economic, political and social systems; and several of these special traits create a favorable environment for corruption. The implications of these findings are discussed in the next section.

Table 1. The explanatory variables of corruption and the special characteristics of small states

Factors	Explanatory variables analyzed in the corruption literature	Special characteristics of small states outlined in small state studies	Impact of small country traits on corruption
Economic factors	Wealth as measured by GDP per capita, economic growth, income distribution and poverty, wages, size of the public sector, import share, economic freedom, openness and restrictions on foreign trade, foreign investment, capital markets, inflation, natural resources, socio-demographic factors	Very diverse level of economic development; many belong to the category of developing states (SIDS); small domestic markets; small open economies; high dependence on international trade; limited competition at home; importance of FDI; potential dependence on development assistance; limited natural resources	Higher economic freedom, openness to trade, reliance on import and external pressure to improve governance potentially reduce corruption Small markets, lack of economic diversification, limited domestic competition and high shares of foreign aid potentially increase corruption
Politico-administrative factors	Political and civil liberties, length of democratic traditions, freedom of press, structure of the government (federalism and decentralization), electoral system, governmental administration, political instability, legal system and rule of law, quality of governance and bureaucracy, merit system, participation	Majority democratic; pressure towards centralization; diverse in terms of ethnicity and religion; informality and personalism; formal institutions missing or under-institutionalized; potential capture by interest groups or interest groups missing; multi-functionality; limits to specialization; constraints on steering and control; constraints to merit system	Democratic institutions, smaller scale of systems, higher transparency, higher accessibility, international donors potentially reduce corruption High informality, “hollow” formal institutions, individual autonomy, small elites, weakness of media, administrative centralization, multi-functionality, and lack of expertise potentially increase corruption
Socio-cultural factors	Trust, religion, ethnic, linguistic and religious fragmentation, urbanization, historic background (e.g. colonialism, transition), geography, gender representation, value system	More cohesive; more trust-based; post-colonial background; remoteness and insularity (SIDS); particularistic relations; managed intimacy; perceived vulnerability; adherence to tradition; importance of independent statehood	Small social field, particularistic relations and high probability of conflicts of interest potentially increase corruption Trust, social cohesion and shared national identity potentially reduce corruption

5. Discussion

Drawing on the increased recognition of context in corruption research and the controversial findings on the function of country size, we aimed to explore the knowledge created by small state studies and its implications for understanding public sector corruption. The overview above indicates that small state studies provide several insights for corruption research. The three groups of explanatory factors brought forward in the academic debate on corruption – economic, politico-administrative and socio-cultural – embrace also the core issues raised in small state studies. Although small states are diverse regarding their socio-economic development, natural resources, ethnic background, history, value system etc., some of the traits related to small size potentially lower the probability of corruption whereas a number of others are seen to increase corruption risks and hinder anti-corruption activities. For example, while openness of the economy, economic freedom, democratic traditions, transparency, and high trust potentially reduce corruption, small states’ lack of economic diversification and lack of competition in combination with weak media systems may lead to dependence on powerful interest groups, creating a favorable environment for state capture and rent-seeking. The problem is further exacerbated by small elites and close personal connections potentially creating numerous conflicts of interest. The social intimacy combined with informal coordination and communication may result in the weakening of traditional Weberian values of public administration like impersonality, neutrality, objectivity, and predictability. These values have been emphasized as crucial in ensuring the rule of law, quality of governance, and meritocratic bureaucracy, all of which function as deterrents of corruption. In short, small states can be structurally more vulnerable to corruption.

Nevertheless, despite the finding that there are several traits of small states that create a favorable environment for public sector corruption, the verdict on the function of country size is still open. In addition to small states being very diverse, corruption itself is a highly complex social phenomenon that goes to the very fabric of states’ political, economic and cultural institutions (Collier 2002). It depends on the specific institutional environment whether the factors relevant for corruption balance or amplify each other’s impact. According to small state studies, the interaction of the factors can be expected to function differently in small countries than in large countries. Importantly, small states are not scaled-down versions of large ones – missing economies of scale and small social fields make them different qualitatively and create a special context for corruption. For instance, Larmour and Barcham (2006, 183) conclude that “the principles underlying the NIS [*National Integrity Systems*] – of mutual supervision between various institutions, checks and balances, independent offices – seem to run into difficulty when applied at a very small and personal scale.” Moran (2001, 385-386) proposes that small countries might be especially vulnerable to the infiltration of criminal money.

Consequently, we argue that the challenge of advancing research on the relationship of country size and corruption is both a theoretical and an empirical endeavor. The combination of the existing knowledge from corruption research and small state studies offers several avenues for further research. In light of the main controversies in the existing corruption research identified above – no agreement on the causal relationship, lack of discussion on the definition of “smallness”, under-theorization of the function of size, and the usage of decentralized units as proxies for small countries – a few propositions can be made. First,

despite the endemic shortage of statistical data on small countries acknowledged by several scholars (e.g. Amin and Soh 2019, 26; Briguglio 2018b; Knack and Azfar 2000, 2003), there is more information available today than two decades ago when the most often cited studies on the topic were published. The most recent Transparency International CPI includes data on 180 countries (out of 193), allowing the quantitative analyses to be repeated with more data points. Thus far, comparative international studies seldom include the size of countries among their explanatory variables (Veenendaal and Corbett 2015; Sarapuu and Randma-Liiv 2020). Yet, as Corbett and Veenendaal (2018, 166) convincingly point out in the context of comparative political science, the exclusion of small states can be detrimental to the discipline, and adding them is vital “because they do not conform to the standard battery of theoretical explanations found in mainstream democratization theory” (see also Ólafsson 2020).

Consequently, there is the need to include small countries more in the studies on public sector corruption in order to make use of the existing data and to incentivize the creation of new data and knowledge. However, in this endeavor, the problem of lacking data cannot be solved by using decentralized units of larger (federal) states as proxies for small countries. The main arguments for the substitution are found in the similarities of the basic statistical information, like population, area, budget, and maybe even isolation or socio-cultural distinction. Nevertheless, sub-national units and their governance have some decidedly different characteristics compared to small sovereign countries. While sub-national units deal with a limited number of functions, independent small states have to take care of the same tasks as large states – foreign and defense policy, infrastructure, environment, taxation, etc. Furthermore, sub-national units most often are part of a wider society and can draw on its population in terms of human resources whereas smaller states usually have restricted opportunities for that. These differences mean that there are considerable limitations to using decentralized units of larger states as proxies for small ones.

Second, even when the relationship between country size and corruption is conceptualized as an empirical issue, there is the need for underlying theoretical explanations. As Amin and Soh (2019, 26) argue, future research needs to delve into the causal mechanisms through which the size of the country affects the level of corruption as well as into the interaction of different drivers of corruption in order to find out if they “work independently of each other or substitute or complement one another”. There is substantial room for the development of theory on the function of size as a factor of corruption. With regard to the definition of size, the size of a population emerges as a key variable shaping the economic, political and social institutions of countries. While small state studies do not provide us with a clear cut-off point between small, medium or large countries either, the studies underline the importance of “economies of scale” as the central concept explaining the function of size. Due to the research interest, the focus of small state studies is mostly on economies and diseconomies of small scale. However, this knowledge can be used to guide analysis on the relevance of size more generally and also to inquire whether there exists an optimal country size from the perspective of corruption (see Jugl 2019).

In advancing the theoretical understanding of country size as a factor, perhaps the most potential lays in studying the socio-cultural factors. The special social ecology is the key trait that runs through all the spheres of the small state context – economic, political and

socio-cultural. As corruption is inherently interpersonal (Philp 2005), we can assume that the nature of relationships in a society shapes the nature of corruption as well. Most of all, the particularistic environment with high personalism and informal communication means that there is a much bigger role for individual choices than in larger states. As Ólafsson (2020, 153) argues in the context of political communication, the underlying assumption that the professional roles of journalists and politicians can be studied without taking into account the actual persons fulfilling the roles needs reframing in small state context. It means that studying formal institutions has less explanatory power in small countries, and it is crucial to look into the choices and perceptions of individuals (Larmour 2008, 237; Larmour and Barcham 2006, 178; see also Transparency International 2022, 35–36). The latter observation has at least two implications for corruption research – first, a more nuanced approach to the definition and measuring of corruption is needed in order to take account of different forms of corruption becoming manifest; and, second, quantitative comparative studies of corruption need to be complemented with detailed and systematic qualitative studies on the socio-cultural factors of corruption.

Last but not least, the findings presented above have implications for anti-corruption practice. The special social ecology of small states forges close connections between people and challenges the typical anti-corruption rules and regulations. As Walton (2021, 9) argues, small size does not always come with cohesiveness, and more heterogeneous states have to address “the social, economic and cultural drivers of identity formation and corruption” to successfully combat corruption. For example, close relationships and multiple roles may make it more difficult to establish conflict of interest rules, and provide effective whistleblower protection; lack of experts may create revolving door risks; conflict avoidance may hinder effective control, etc. Many of those rules and instruments may have to be adapted to suit the small state environment. Considering the openness of small countries to the global pressures through business, international organizations and foreign aid, the international anti-corruption policies and their influence on small state policy-making could be of further interest. Closer attention being paid to the potential tension between the global best practices type of policy learning on the one hand, and the need to adapt those best practices to the small state context, on the other, could provide interesting information not only on the anti-corruption policies in small states but also on the transferability and universality of policy instruments in general.

6. Conclusion

The article aimed to contribute to the academic debate on public sector corruption, seeking to understand the impact of societal norms and institutions as the causes of corruption. More specifically, it aspired to take an in-depth look into small state studies and to explore the relevance of this knowledge for corruption research. The analysis was inspired by the lack of solid explanations on the function of country size in corruption research. The analysis showed that small state studies do not provide an unequivocal explanation on the function of country size either. The special characteristics of small countries work in both ways – they enhance the corruption risk as well as reducing it. However, the studies define the size of a population as a critical characteristic of countries; explain the impact of small populations on the economic, political and social systems of countries; and outline the special corruption risks related to the

limited scale. The article substantiates the need for more studies into the causal mechanisms of country size and delineates several avenues for further research. Most importantly, small states need to be included in international comparative studies on corruption more than has been the case thus far, quantitative comparative research needs to be complemented with detailed qualitative studies, and considerable progress in knowledge can be expected from linking the socio-cultural factors of corruption with country size. These further steps will benefit both the academic corruption research and international anti-corruption practice.

Acknowledgements

This work was supported by the Estonian Research Council grant PRG1125 and TalTech institutional development grant SS21002. The authors wish to thank the colleagues who have shared their reflections on the earlier drafts of the article, especially Jack Corbett, Tiina Randma-Liiv and Teele Tõnismann.

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Appendix 5

Publication V

Saarniit, L., Sarapuu, K. Taking Stock of 30 Years of CEE Transformation: Institutionalisation of Integrity Management System in Estonia. Manuscript submitted to the *NISPAcee Journal of Public Administration and Policy*. (ETIS 1.1).

Taking stock of 30 years of CEE transformation: Institutionalisation of the integrity management system in Estonia

Leno Saarniit¹ and Külli Sarapuu²

Abstract

This article aims to take an in-depth look at integrity management reforms in the context of Central and Eastern European post-communist transformation. It offers a detailed account of integrity management reforms in Estonia. Despite the centrality of integrity management for post-communist administrative change, there is only limited longitudinal research on the topic to date and no ready-made theoretical frameworks available for analysis. The article tackles both shortcomings. Relying on an analytical framework that combines integrity management elements and the factors of institutional change, the study examines how the Estonian integrity management system has become institutionalised and which factors have shaped its development. The article concludes that the development of the Estonian system and its evolution from an initial compliance-based approach towards a more value-based approach has been shaped by a combination of factors: the desire to overcome the country's communist legacy, pressure and examples from the international level, and the strategies of politico-administrative actors. Reliance on a system with "softer" instruments has coincided with an increase in administrative capacity and expertise.

Keywords: integrity management, CEE transformation, corruption, public service, Estonia

1. Introduction

A wave of remarkable political, economic, and social change swept over the countries of Central and Eastern Europe (CEE) at the end of the 1980s and the beginning of the 1990s. The radical change of political regime from communism to democracy and from planned to market economy was accompanied by a significant social transformation as well as adjustment in the institutional structures of the states. Yet, as Randma-Liiv and Drechsler (2017, p. 597) argue, it was not structural change that presented the biggest challenge but the shortage of well-qualified officials and the process of transitioning to good civil service in a situation where there was 'neither good tradition nor ethos' (see also Drechsler, 2005). Thus, the institutionalisation of a functional democratic integrity management

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system emerged as a major task for the CEE states. It has been crucial in a context where corruption is rife and post-communist countries have been claimed to form a “league of their own” (Møller & Skaaning, 2009, p. 725).

Nevertheless, there is surprisingly little information available on the institutionalisation of integrity management systems and their longitudinal trends in the CEE region. Although a number of ‘snapshot analyses’ of national integrity systems (as defined by Transparency International) in the CEE countries exist, there are no longitudinal studies on the institutionalisation of integrity management in the region. Academic debate lacks research on how integrity management systems in the CEE region have emerged and how new rules have been adopted and implemented. Furthermore, there are no ready-made theoretical frameworks available for mapping longitudinal developments in the post-communist context. Consequently, after 30 years of transformative changes in the CEE region, it is time to take stock of the developments.

We focus on Estonia, a small parliamentary republic that regained its independence from the Soviet Union in 1991 after 50 years of occupation. The three decades since have seen major political, economic, social, and institutional reforms. The reforms undertaken resulted in EU and NATO memberships in 2004, and OECD membership in 2010. In the CEE context, Estonia stands out with its lower level of corruption compared to the other countries of the region, with Kalninš (2015) calling it the “world’s smallest virtuous circle”. In this article, we shall focus on answering three main questions:

- 1) What kind of integrity management system has become institutionalised in Estonia?
- 2) How has the system evolved over the three decades from regaining independence?
- 3) Which factors have shaped the development of the system?

While the first question is mostly descriptive and aims to map the institutions and their responsibilities as they are in 2024, the second question focuses on the longitudinal development of the current system, and the third one examines the possible explanations for these changes. The study is guided by a theoretical framework that combines literature on integrity management and a historical institutional analysis of transformation in the CEE region. To operationalise the institutionalisation of integrity management, we rely on analytical frameworks developed by OECD (2000, 2009, 2020) and Transparency International (TI, 2012). The approach taken to explain the developments can be characterised as “transformative” (Christensen et al., 2007, pp. 165–175) – it is expected that changes in the institutional fabric of public administration are born in a complex interplay between conscious and planned strategies of political and administrative leaders, cultural-historical features, and reform pressures originating from the external context of organisations. To organise the study, we rely on the periodisation of the CEE transformation. The empirical analysis of the evolution of the Estonian

integrity management system draws on document analysis and expert interviews with eight public officials involved in the development of the system.

The approach taken is novel in three ways. First, a theoretical framework to map and explain the institutionalisation of integrity management in a longitudinal perspective is proposed. Secondly, a comprehensive and in-depth account of the institutionalisation of an integrity management system in one CEE country is offered. Third, explanations about the role of historical legacies, environmental pressures, and political actors in the development of integrity management systems in the context of post-communist transformation are suggested.

2. Theoretical framework

2.1 Integrity management

Public sector corruption is a very multi-faceted phenomenon and there is no single recipe for corruption control (Mungiu-Pippidi & Johnston, 2017, p. 252). Consequently, the classic question for decades has been the balance between rules and values in managing integrity. The discussion dates back to the Friedrich-Finer debate on external and internal control in the 1930s–1940s (see Andersson & Anecharico, 2019, pp. 64–66; Lawton et al., 2013). Since then, various policies and instruments have been suggested, some focusing on establishing clear rules and external controls, others emphasising self-regulation and the development of an ethical organisational culture. The former can be labelled the compliance-based approach and it has been argued to focus on the ethical low road (Rohr, 1989) or ethical minimum (Bowman, 2000). The latter can be referred to as the value-based approach and relates to the ethical high road or ethical maximum.

The trend of the last decades is to merge these different approaches into comprehensive integrity management frameworks (Andersson & Anecharico, 2019, p. 68). As Persson et al. (2010, p. 6) point out, a “toolkit” type of approach has emerged, providing a list of “one-size-fits-all” instruments aimed at preventing corruption and promoting ethical behaviour. While such comprehensive frameworks also draw criticism (see, for example, Heywood & Johnson, 2017; Macauley & Mulcahey, 2017), they provide a wide-ranging basis for analysing national integrity management systems. To analyse the institutionalisation of the Estonian integrity management system, we combine the elements of two of the most well-known frameworks developed by the OECD (2000, 2009, 2020) and Transparency International (2012). Whereas the OECD framework offers a thorough overview of integrity management functions, Transparency International’s National Integrity System (NIS) pays attention to

the institutional setup of integrity management. So far, these frameworks have generally been used to provide snapshots of national integrity systems. We put the elements into longitudinal perspective.

The cornerstone of our approach is the OECD 2009 integrity framework that identifies four main functions of integrity management – defining and determining integrity, guidance, monitoring, and enforcement. Summary of the functions, representation in other frameworks, and examples of instruments are provided in Table 1.

- 1) The function of **defining and determining integrity** refers to establishing the legal and ethical boundaries of public officials. The focus is on rules for anti-corruption and ethics that determine the limits of acceptable behaviour. This function corresponds to the “integrity” criterion in NIS. Such “ethics laws” (McCullough, 1994) are seen as having three main goals – aspirational, guiding/advising, and regulating (Lawton et al., 2013).
- 2) The function of **guidance** comprises various training and advice systems. The main aim of this function is to ensure that officials are provided with relevant information on ethics laws as well as advice and support regarding ethical dilemmas. The OECD 2009 ethics infrastructure sees it as being part of socialisation mechanisms and the tasks of the ethics coordination body, which corresponds to the “anti-corruption agency” in NIS (TI, 2012).
- 3) The function of **monitoring** focuses on early detection of possible integrity violations and emerging corruption risks. It ensures timely and relevant information on existing or emerging integrity issues. The main instruments include ethics surveys, integrity audits, whistle-blower systems (OECD, 2009) and support by oversight institutions, such as supreme audit institutions, ombudsmen, or administrative courts (OECD, 2020). Monitoring instruments are seen as tasks for the anti-corruption agency in NIS (TI, 2012).
- 4) The function of **enforcement** is aimed at dealing with integrity violations, whether via disciplinary or criminal procedures. OECD (2020) emphasises cooperation between different institutions and electronic databases to manage the cases. NIS (TI, 2012) views it as being part of the anti-corruption agency’s tasks and an element of the accountability criterion for evaluating all public institutions.

Table 1. Integrity management functions based on OECD (2009), representation in other frameworks, and examples of instruments.

Function	Examples
Defining and determining integrity Effective legal framework, codes of conduct in OECD (2000) Standards in OECD (2020) Integrity criterion in NIS (Transparency International, 2012)	Rules on conflicts of interest, procedural restrictions, auxiliary activities, gifts and gratuities, declarations of economic interests, lobbying, codes of ethics, oaths of office. Also, rules on freedom of information, financing of political parties; bribery and trading influence, etc.
Guidance Capacity, ethical leadership in OECD (2020) Socialisation mechanisms, tasks of the ethics coordination body in OECD (2000) Tasks of the anti-corruption agency in NIS (TI, 2012)	Various forms of training, methodological materials, core advisory functions; promoting ethical leadership through competency frameworks, job descriptions, assessment tools, and performance agreements.
Monitoring Oversight, risk management in OECD (2020) Tasks of the ethics coordination body, active civil society in OECD (2000) Roles of the anti-corruption agency, ombudsman, national audit office, civil society in NIS (TI, 2012)	Surveys, integrity audits, whistle-blowing channels, oversight institutions (supreme audit institutions, ombudsmen, administrative courts)
Enforcement Enforcement, oversight in OECD (2020) Efficient accountability mechanisms in OECD (2000) Accountability criterion, tasks of the anti-corruption agency in NIS (TI, 2012)	Disciplinary and criminal procedures, cooperation structures, e-databases to manage cases

Both OECD (2000, 2009, 2020) and Transparency International (2012) emphasise the importance of implementation. They share the same underlying idea: if the framework is well implemented, these institutions, instruments, and processes will lead to more honest and non-corrupt governance and thus ensure public trust in the political and administrative system. NIS (TI, 2012) focuses on implementation through assessment methodology (assessing all the criteria both “on paper” and “in practice”), whereas the OECD’s approach pays special attention to integrating integrity into wider public management, assigning integrity roles, and switching to risk management to overcome implementation gaps (2020).

Our focus in this article is on the systemic level. Although the organisational level is important for ensuring the functioning of several integrity management instruments, the systemic level is crucial in guiding the activities of individual organisations (OECD, 2009, pp. 22–24). Common ethics laws and

advice systems make it possible to develop traditions and ethos across the public sector, detect any emerging issues, and handle integrity violations that fall outside the jurisdiction of single agencies. As our focus is on public administration, we shall not discuss instruments aimed at politicians (e.g., party financing rules) or instruments aimed at cooperation with civil society and the business sector. We are also not going in-depth in discussing the development of merit-based public service in Estonia and the promotion of leadership in public service. The latter issues have been discussed elsewhere (see Randma-Liiv et al., 2022; Randma-Liiv et al., 2015).

2.2. Factors and periods of post-communist transformation

Institutional approaches to administrative change emphasise the importance of the temporal dimension of development and see institutional arrangements as products of “situation-specific compromises” (Olsen, 2009, p. 18). Three core types of factors are expected to combine at different points in time to produce systemic changes (Christensen et al., 2007): (1) the administrative culture and its understanding of the appropriate course of development (i.e., historical-cultural context), (2) environmental pressures, deriving both from international and national contexts, and (3) the conscious strategies of political and administrative actors. Depending on the temporal context, the factors can have different weights and combinations.

First, studies on the institutionalisation of post-communist politico-administrative systems, especially those discussing initial transformations, are dominated by the issue of communist legacy. Communist legacies appear as the central historical-cultural factor in explaining change or its absence. As pointed out by Meyer-Sahling (2009, p. 511) “the very term ‘post-communist’ administration implies that the period of communism is a defining attribute of East Central European administrations”. The issue of historical legacies is paramount in terms of corruption and integrity management. The perspective of legacy explanations tends to be negative – the deficiencies found to be present in the administrative systems of the CEE region are perceived to be the “inheritance of the former system of governance which has proved extremely difficult to shake off” (Verheijen, 2007). Furthermore, corruption has tended to spike after the start of democratisation efforts (Zaloznaya, 2017, p. 12). However, as noted by Crawford and Lijphart (1995, p. 176), in the establishment of democratic political systems in the CEE region, historical legacies became tools of political discourse and competition, and their relative weight was determined by specific national contexts.

Second, although the early stage of transition led to the acknowledgement that values, norms, and governance patterns of the Soviet system were no longer suitable for the newly democratic states, the CEE countries lacked both a clear understanding of what a new set of values and norms should be like

and how to change the system. This lack of experience with institutions necessary for independent statehood and the need to implement major reforms in a very short time led to the assumption that it was an exceptional opportunity for Western models and know-how to influence these administrative reforms through support and supervision provided by different international actors – the OECD/SIGMA (financially supported by the EU), the World Bank, IMF and bilateral donors (Nemec, 2009). Later, the impact of the “conditionality” of European Union membership emerged – the need to demonstrate administrative capacity and the ability to effectively apply the *acquis communautaire* before accordance of full EU membership (Grabbe, 2003). Although the Copenhagen criteria that were set as conditions for accession to the EU in 1993 (European Council, 1993) did not mention anti-corruption policies, the achievement of goals such as the stability of institutions, protection of human rights, and a functioning market economy assumed good governance. Consequently, accession to the EU entailed high pressure to deal with integrity management (Hardy, 2010; Vachudova, 2009). At later stages, integrity management efforts can be expected to be influenced by international organisations specifically focused on combating corruption, e.g., Transparency International, GRECO, as well as OECD.

Contrary to considerable reform pressure from the international level, very low pressure from the national level is usually described, especially in the early phases of transformation, being related to the weak civil societies in post-communist countries and the under-institutionalised mechanisms of state-society cooperation (Goetz & Margetts, 1999; Nemec, 2009). However, that may be different for the fight against corruption (for instance, Pawelke, 2010; Sadiku, 2010; Schmidt, 2007). The interest and influence of investigative media, which is not necessarily keen on administrative reforms, might be heightened in the case of corruption scandals.

Third, all explanations of post-communist transformation are void without looking at the politico-administrative actors that have functioned as enablers, carriers, or enforcers of the legacies and interpreters of the external pressures. The actors, their preferences, identities, resources, and constellations as well as their relationship to the opportunities, constraints, and incentives in the context in which they found themselves have been important (Mayer-Sahling & Yesilkagit, 2011). We can expect to see political actors either supporting the integrity management reforms or opposing them (Allina-Pisano, 2010). The political actors may initiate the reforms, contribute to their implementation through allocation of resources and adoption of effective accountability and control mechanisms (OECD, 2000). Environmental pressures come into play as factors, pushing the actors towards starting integrity management reforms or keeping them going.

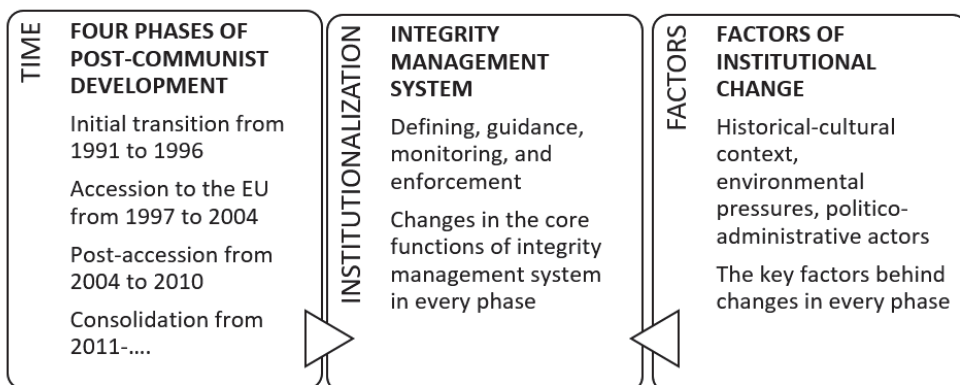
In order to provide a structured discussion of the longitudinal development of the Estonian integrity management system, we organise our empirical analysis by periods of post-communist

transformation. Four general phases of development emerge from the studies of reforms in the CEE region, with their distinctive contents and drivers of change (see Hesse, 1997; Lippert et al., 2001; Nemeč, 2009; Randma-Liiv & Drechsler, 2017; Sarapu, 2011, 2012). The phases vary to some extent in different publications and for different CEE countries but overlap in their core characteristics.

- 1) **Initial transition from 1991 to 1996.** A period characterised by a radical break with the old legal, political, social, and economic orders and the early formation of new institutions. Changes can be expected to be driven by the strategies of political elites with an aim to overcome the legacy of the previous system and shaped by the supply of international know-how.
- 2) **Accession to the EU from 1997 to 2004.** A period characterised by increasing adaptational pressures from the EU, mediated by the strategies of politico-administrative actors.
- 3) **Post-accession from 2004 to 2010.** A period immediately after the accession to the EU characterised by changes that result from a complex interplay between political strategies, historical-cultural convictions, and environmental pressures without any of them having such a defining role as in the previous two phases.
- 4) **Consolidation from 2011–....** The most recent period where specific national factors dominate and there is no reason to talk about CEE as a region anymore in terms of shared reform pressures. In general, this phase is characterised by increasing attention to public sector coordination, digitalisation of public administration, and governance.

The conceptual framework guiding the structure of the empirical analysis is summarised in Figure 1.

Figure 1. Conceptual framework for the analysis



3. Methodology

The empirical study was carried out in three stages. First, key events in the evolution of the system were mapped by document analysis. It was possible to track formal changes in the integrity management system by analysing various documents shedding light on the events. The analysis covered institutional changes since regaining independence in 1991. More than 100 public documents, among them legal acts, coalition agreements, legislative initiatives, and their accompanying notes and records of discussion in Parliament (*Riigikogu*), were analysed. The documents used were retrieved from the electronic databases of the Parliament, the electronic database of the *State Gazette (Riigi Teataja)*, printed issues of earlier *State Gazettes*, and other sources.

Second, relying on document analysis, critical events regarding the evolution of the integrity management system were determined and a timeline of events was developed. The events were analysed in terms of their nature and relationship to the integrity management function (adoption of defining, guidance, monitoring, or enforcement instruments). As much as was possible, the explanatory information on the factors behind the changes was gathered and the presence of different factors documented.

For the third step, the findings were triangulated in eight expert interviews with public officials who had been engaged in the development of the integrity management system over the last two decades. The interviewees were selected based on document analysis and the authors' experience of following integrity management reforms in Estonia. The interviewees were promised anonymity. The list of interviews is presented in Annex 1. In the interviews, the public officials were asked about their perceptions concerning the critical events in the evolution of the system and the key factors behind the changes. Also, generalisations drawn from the document analysis were tested with the interviewees. Based on the three methodical stages described above, the narrative of the institutionalisation of the Estonian integrity management system emerged. It is presented in the next sections.

4. INSTITUTIONALISATION OF INTEGRITY MANAGEMENT IN ESTONIA

4.1. Description of the Estonian system

As of 2024, the core legal framework defining and determining integrity is provided in the 2012 Civil Service Act (CSA) and in the 2012 Anti-Corruption Act (ACA). The CSA focuses specifically on public service, which is narrowly defined as service or employment in state and local government authorities (CSA § 2). The CSA includes requirements for the oath of office and ancillary activities and establishes

the disciplinary liability of officials and the nature of the Council of Ethics for Officials. The ACA, on the other hand, is targeted both at officials inside and outside of public service. The definition of an official in the ACA differs from the one in the CSA (*ametnik* in CSA; *ametiisik* in ACA). The ACA definition is considerably broader, covering also politicians and other public positions with decision-making power.³ The ACA comprises provisions for conflicts of interest, procedural restrictions, gifts and gratuities, declarations of economic interest, whistle-blowing and prohibitions on corrupt use of official position, public resources, influence, and inside information. It also establishes the obligations of individual agencies and the coordination of anti-corruption activities. The two laws are supported by the Code of Ethics for Officials and several good practice guidelines adopted by the Council of Ethics, as well as government guidelines on conflicts of interest for ministerial advisors (political positions) and lobbying. The same set of rules applies to municipal governments.

When it comes to the institutional arrangement of guidance, monitoring and enforcement functions, the Estonian system is decentralised. The responsibility for raising the ethical awareness of officials as well as monitoring their daily work regarding adherence to ethical and anti-corruption requirements rests with individual public organisations. There is no separate anti-corruption agency as defined in the Transparency International's (2012) NIS framework. Integrity management is seen to form an element of both the general development of public service and of anti-corruption activities. Consequently, the main responsibility for the integrity management system is divided between two institutions – the Ministry of Finance and the Ministry of Justice. The Ministry of Finance is responsible for the coordination of public service development as well as public service ethics. It organises ethics and anti-corruption trainings and serves the Council of Ethics for Officials that has a key role in guidance. The Ministry of Justice coordinates anti-corruption activities. Both ministries develop methodological materials and advise other agencies as needed. Both ministries also conduct regular surveys and policy analyses monitoring the situation. These serve as inputs for further policy development. Enforcement consists of disciplinary and criminal procedures, with the former being a task of individual organisations, and the latter being the responsibility of law enforcement agencies – the Police and Border Guard Board, Internal Security Service under the Ministry of Interior, and the Prosecutor's Office under the Ministry of Justice.

Thus, a functional integrity management system has emerged in Estonia over the three decades of post-communist development. The combination of the legislative framework defining and determining

³ According to ACA, an official is “a natural person who holds an official position for the performance of public duties regardless of whether he or she performs the duties imposed on him or her permanently or temporarily, for a charge or without charge, while in service or engaged in a liberal profession or under a contract, by election or appointment” (ACA § 2, 1).

integrity, the guidance and monitoring functions, and enforcement by respective agencies provides the Estonian state with a robust security net that helps to avoid corruption and detect wrongdoings. According to the World Bank Worldwide Governance Indicators Control of Corruption index, in 2022, Estonia belonged to the 91 percentile (World Bank, 2024). According to the latest Transparency International Corruption Perception Index, in 2023, Estonia ranked 12th in the world (score 76), far beyond the other CEE countries (TI, 2024). The next sections analyse the institutionalisation of its integrity management system over the four phases of post-communist transformation.

4.2. Institutionalisation of the system

4.2.1. Initial transition from 1991 to 1996

The first period after regaining independence was generally characterised by adoption of basic legislation, including the first CSA (initiated in 1993, adopted in 1995) and the first ACA (initiated in 1994, adopted in 1995). These laws included provisions on conflicts of interest, ancillary activities, procedural restrictions, gifts and gratuities, post-employment restrictions, oath of office, declarations of economic interests, as well as disciplinary procedures. The adoption of the ACA in 1995 was a political initiative by a group of parliamentarians and faced considerable opposition (Mereste, 2006). One of the issues challenged was the need for and the justifiability of a separate act in addition to the Criminal Code. The 1992 Criminal Code, which was an amended version of the Soviet Criminal Code, included penalties for corruption crimes (e.g., abuse of office and bribery). Individual public organisations were responsible for any disciplinary measures, including disciplining offences against “widely recognised moral principles” or offences that discredited the officials themselves or governmental institutions (CSA § 84). Enforcement and investigation of corruption crimes was made the responsibility of the Police Board and the Internal Security Service. The legislation did not specify any institutional responsibility for the coordination of integrity management or anti-corruption policies, training or advising systems. There were no surveys monitoring the situation.

4.2.2. Accession to the EU from 1997 to 2004

The main changes in the legal framework defining and determining integrity included the adoption of a new wording of the ACA in 1999 and the Penal Code in 2001 (repealed the 1992 Criminal Code). The second ACA specified the definition of “officials” and clarified the provisions regarding declarations of economic interests, including the control of declarations. Another significant addition included the adoption of the Public Service Code of Ethics as an appendix to the CSA specifying the values of public service (for detailed discussion see Saarniit, 2006). The ACA as well as the Code of Ethics were prepared

and discussed in different administrative working groups before being adopted by the Parliament. The 2001 addition to § 6 of the ACA appointed the head of an authority responsible for creating management practices that enable monitoring the lawfulness of the activities of officials and their adherence to any restrictions on decision-making and ancillary activities. Still, most of the rules and restrictions concerning ethics in the ACA and CSA remained unchanged in this period.

In addition to the implementation of the legal framework, the need for a more comprehensive anti-corruption policy focusing on the development of all integrity functions was recognised, resulting in the adoption of the anti-corruption strategy “An Honest State (2004–2008)” by the Government in 2003. This work was led by the Ministry of Justice, headed by the political party Res Publica that had made fighting against corruption its priority in the 2003 general election. The draft for the strategy was written by a working group consisting of public officials as well as experts from outside public service. In this first strategy, the priorities included strengthening the auditing of municipalities, electronic systems for submitting declarations of economic interests, establishing an ethics council for public servants, increasing the awareness of the general population about corruption, and increasing the capacity of investigating corruption crimes. Although some of these ideas were only realised a decade or more later, this strategy started a systematic anti-corruption policy and has been followed by three new strategies (or working plans) over the years, with specific action plans as well as reporting and monitoring.

This period also saw the beginning of intensive international cooperation with the ratification of two corruption conventions (the Council of Europe Civil Law Convention on Corruption in 2000, the Council of Europe Criminal Law Convention on Corruption in 2001) and participation in GRECO’s first round of evaluations (2000–2001). The GRECO evaluation report (2001) pointed out that corruption in Estonia was limited compared to other post-communist states and the system had “a variety of relatively reliable state control mechanisms” (p. 22). However, the report argued that the Estonian system was mostly reactive and relied too heavily on enforcement by the Internal Security Service, while not utilising the capacity of several other institutions to prevent corruption through guidance and monitoring (p. 24). Also, “insufficient research on corruption” was pointed out (p. 23).

4.2.3. Post-accession from 2004 to 2010

The 2004 amendment to § 23 of the ACA included the obligation of officials to inform the head of their organisation, the Internal Security Service, the Police and Border Guard Board, or the Prosecutor’s Office of any corrupt activities known to them and established fines for failure to do so. In 2009, the Parliament submitted a new draft of the ACA, proposing several significant changes based on existing implementation issues as well as the comparative analysis of international practices, GRECO

recommendations, and prior surveys and policy analysis. However, the draft act was not adopted before the general election in 2011 and the proceeding ceased.

The second round of GRECO evaluations (starting in 2003) targeted public administration ethics, specifically conflicts of interest and auditing systems, pointing out the vulnerability of local municipalities and the emerging role of the National Audit Office. It also criticised the system for issues with declaring assets and reporting corruption, while stating that the legal framework is “solid” (GRECO, 2004, p. 14). The third round starting in 2008 did not analyse integrity management instruments in the public service (GRECO 2008a, 2008b).

The second anti-corruption strategy for 2008–2012 was adopted by the government in 2008. It was more comprehensive compared to the first strategy in its coverage of topics, basis in surveys, budgeting and monitoring systems. Several new topics targeting areas most vulnerable to corruption were added, for example, corruption in the private sector, medical sector, financing of political parties, issuing of driver’s licences, roadworthiness testing, and registration of vehicles. Systematic surveys provided important input to defining these new topics.

With regard to institutional changes, in 2005, the position of an ethics advisor was established at the Government Office’s Department of Public Service. The function and responsibility for coordinating public service as a whole was transferred to the Ministry of Finance in 2010. The creation of the position of an ethics advisor resulted in the development of new integrity instruments. For instance, to establish a systematic ethics training programme, training materials were adapted from OECD’s/SIGMA’s resources on public sector ethics, taking into account the specific needs of Estonian public service. Additional study materials were added over time, including the OECD toolkit for managing conflicts of interest in the public sector, the handbook for avoiding conflicts of interest in the Estonian context, case studies based on ethics and corruption issues presented in the Estonian media, as well as an overview of queries to the ethics advisor from Estonian public service (see Pevkur, 2008 and Sihver, 2013 for more details). All these programmes have been offered continuously to this day, with updated study materials, case studies, and target groups.

For monitoring functions, a new survey titled “Roles and Attitudes in Public Service” was launched by the Government Office and continued by the Ministry of Finance. The survey has been conducted multiple times over the years (2005, 2009, 2013, 2017, 2023) with the same methodology and it has provided valuable insights into the values and image of public service, attitudes towards ethically questionable practices, enforcement opportunities, as well as longitudinal changes. Also, this period is characterised by the introduction of systemic corruption surveys by the Ministry of Justice. In 2004, the first corruption survey was launched. Although ad hoc surveys had been conducted previously, the

aim of the new survey was to go beyond the topic of bribes and analyse other forms of corruption as well as compare the attitudes of the general public, entrepreneurs, and public officials. The survey has been repeated in 2006, 2010 and 2016. Although the rules on disciplinary offences remained the same, the rules determining the roles of the police and Internal Security Service and their division of responsibilities in investigating corruption crimes were specified in 2004 and in 2007.

4.4.4. Consolidation from 2011-...

The integrity management system has gone through several significant changes since 2011. First and foremost, the new wordings of both the ACA and the CSA were adopted in 2012 and came into force in 2013. As one of the aims of the new wordings was to align the contents of the two laws (including terminology, restrictions regarding integrity management instruments), both laws came into force at the same time. The adoption of new acts led to several institutional changes as well as significant changes in the requirements for ethics.

The 2012 CSA established the difference between public officials and employees, with the requirements for ethics only applying to the former, including obligations (§ 50 to 51) and restrictions on ancillary activities (§ 60). The rules on ancillary activities became less strict and the Council of Ethics was created (§ 12). The new Code of Ethics was adopted by the Council in 2015, with the previous code being in effect until then. The Council of Ethics added several “good practice guidelines” on topical conflict of interest issues (officials as training providers in 2014, freedom of expression in 2016, gifts and gratuities in 2018; draft guidelines on ancillary activities in 2023) as well as commenting on specific cases and draft legislation from institutions.

The ACA saw similar restructuring. An updated version of the 2009 draft was submitted in Parliament in 2012, with an explanatory memorandum listing international agreements, the experience of other countries, Estonian anti-corruption strategies, and the priorities of law enforcement institutions as the basis for the new draft. The main institutional changes included the Ministry of Justice being appointed as the coordinator of anti-corruption policy (ACA, § 8), while individual organisations were seen as responsible for ensuring “awareness in the field of the prevention of corruption” and “supervision over performance of the obligations” (ACA, § 3) with the select anti-corruption committee in Parliament exercising parliamentary supervision over the implementation of anti-corruption measures (ACA, § 9). The 2012 ACA also reduced the number of officials obligated to submit a declaration of economic interests and established a new electronic system for submitting declarations. Instead of the “obligation to inform” of any corrupt activities, the new law stated that officials are “not permitted to conceal” them (ACA, § 6).

International cooperation continued, including the ratification of the United Nations Convention against Corruption, with GRECO's fourth (focusing on members of parliament, judges, and prosecutors; GRECO 2012) and fifth evaluation rounds (focusing on top executives and law enforcement agencies; GRECO 2018). As a result of the fifth evaluation round, lobbying guidelines for public officials and conflict of interest rules for ministers and their political advisors were adopted in 2021 (Government of the Republic, 2021). However, Estonia still lagged behind in whistle-blower protection, failing to transpose the respective EU directive (2019/1937) by the December 2021 deadline. Although the draft act was presented in the Parliament in January 2022, it was not adopted before the general election in March 2023. Thus, the draft must be submitted again.

The main elements of advisory and monitoring systems (role of ministries, training, surveys) and enforcement instruments have continued, with the police establishing a corruption investigation bureau under the National Criminal Police in 2011 and the Ministries of Justice and Internal Affairs introducing a regular format of coordination on the level of ministers and top officials. The National Audit Office has contributed to the monitoring function with its reports that analyse the implementation of the ACA in local governments from 2009, 2012, and 2017 (NAO, 2009, 2012, 2017). Although several key objectives in anti-corruption strategies have been repeated (e.g., municipal corruption, investigative capacity of law enforcement agencies, raising awareness, etc.), the focus of the last two anti-corruption strategies (2013–2020, 2021–2025) has shifted to some extent. For example, less attention has been paid to the awareness of public servants, while more tasks have been aimed at raising awareness of the general population (especially young people, the business sector). Another shift concerns the focus on the transparency of decision-making processes, e.g., legislation, political processes, public procurement. Several new vulnerable sectors have been highlighted, including medicine, education, business, environment, and sports. A more specific priority is seen in the adoption of requirements for whistle-blower protection and evaluating the impact of anti-corruption policies.

5. Discussion

As appears from the longitudinal narrative above, the core of the integrity management system in Estonia has been in existence since the mid-1990s. While the early transition phase focused on the adoption of key legislation, the EU accession period saw the beginning of international cooperation, including the ratification of anti-corruption conventions, as well as the beginning of international evaluations. As there were no "old" integrity management instruments to discontinue, condemning corruption formed the backbone of adopting new anti-corruption and integrity management policies.

Despite the need to change the values and attitudes prevalent in the public sector (and in society as a whole), the instruments that were chosen in the first stages were strictly legislative (establishing rules and investigative procedures). It can be explained by time pressure, the high workload of reforms, and lack of expertise. As expertise grew, soft instruments (advising, training, monitoring) emerged.

Cohesion between the ACA and the CSA increased considerably since 2013, which was an important year for integrity management. Since 2013, integrity management in Estonia has moved from a rules-based system towards a more value-based approach. With the 2013 wordings of the ACA and the CSA, several standards became less strict (e.g., regarding ancillary activities) or began to apply to fewer positions (e.g., the Code of Ethics, declarations of interest, some ancillary activities), with more decision-making power being given to individual organisations (e.g., regarding ancillary activities, declarations of interest, etc.). Although the 1999 Code of Ethics was value-based, some of the disciplinary measures as well as references in legislation somewhat increased its legal power (see Saarnit, 2006). As these disciplinary measures were not included in the 2013 version of the CSA, the value-based nature of codes of ethics (1999, 2015) has been more apparent. In addition, codes of ethics have been supported by several “good practice guidelines” that serve as guiding, rather than regulating instruments.

The post-EU accession and consolidation years have also seen an increasing and systematic focus on implementation. The system has moved from several notable implementation gaps to more cohesive coordination and implementation (e.g., establishing an electronic system for the declarations of interest, ethics trainings, establishing the Council of Ethics, etc.). Although increasing the enforcement capacity for investigating corruption crimes has always been high on the agenda, in the initial stages, Estonia lacked several functions that can be considered crucial for implementation, most of all guidance and monitoring. These softer functions that rely on preventing integrity violations, rather than just reacting to them, have emerged gradually since the early 2000s.

A combination of politico-administrative, historical-cultural, and environmental factors has contributed to such institutionalisation of the integrity management system in Estonia. As a legacy of the Soviet Republic, Estonia inherited a favourable environment for corruption and a politico-administrative system whose values did not match the requirements of a democracy (Mereste, 2006). Despite Estonia having been described as “less tolerant of corruption” than other parts of the former Soviet Union (Kalniņš, 2015, p. 7) and showing somewhat lower acceptance of bribery (World Values Survey Wave 3, 1995–1998), corruption was recognised as a major issue after regaining independence (Mereste, 2006; Laar, 2015, p. 98). From 1992, the first democratically elected government attempted to make a sharp break with the communist past. Although the “Clean the house!” slogan used by Pro

Patria Union that won the 1992 general election was not exclusively related to the problem of corruption, it was relatively common to believe that “corruption and other unethical things were directly related to the Soviet political regime” (Kasemets 2012, p. 44).

The former prime minister Mart Laar (2015, pp. 98–100) attributes Estonia’s success in anti-corruption reforms to five main changes: overhaul of the elite (political, administrative, state-owned enterprises), general liberalisation, decreasing the amount of bureaucracy, creating an efficient and well-paid public service, and general modernisation of the state, including e-governance. The experts interviewed for the study emphasised several of the above factors, especially the critical role played by the political and administrative elite (Int1, Int3, Int4, Int6, Int8). In addition, two crucial factors related to the economic reforms were outlined – avoidance of the emergence of oligarchs (Int2, Int6, Int8) and the influx of economic investments from the Nordic countries bringing with it the Nordic business culture and values (Int1, Int3, Int5, Int6, Int7). As argued by one of the interviewees, “the Nordic culture, their openness and transparency also put pressure on Estonian companies that wanted to be successful to adopt the same principles and values”. This potentially led to less demand for corrupt practices from the private sector as well as contributed to general awareness in society.

The environmental factors and international examples have been significant also in several other respects – the practices of other countries being used as role models in legislative drafting, the influence of international cooperation, and pressures for reforms. Reliance on the legislation of other countries for inspiration for new integrity management instruments is evident from the early 1990s. The 1996 version of the CSA drew considerably on German public service legislation (Randma-Liiv et al., 2022). The explanatory memorandum of the 1995 ACA stated that “authors have taken into account the anti-corruption activities and legislation of several foreign countries (e.g., USA, Sweden)” (Ministry of Justice, 2012a, 2012b). The explanatory memoranda of the 2013 versions of the CSA and the ACA referred heavily to a comparative analysis that was conducted before drafting the acts, including references to the legislation of 7–9 different countries, EU regulations, and in the case of the ACA, to international agreements on anti-corruption activities. The public officials interviewed for the study highlighted the importance of contacts with other countries and the opportunities to learn policy lessons from them (Int3, Int4, Int5, Int6, Int7).

Furthermore, since the late 1990s, Estonia has systematically been involved in international anti-corruption cooperation via ratifying relevant conventions (Council of Europe, United Nations) and being open to international evaluations (esp. GRECO, TI). These cases have also resulted in drafting or adopting new legislation (e.g., lobbying rules as a result of GRECO’s recommendations, drafting whistle-blower legislation as a result of the EU directive, etc.). A more general influence can be seen

in EU accession negotiations and membership. Establishing a state that would function effectively within the EU framework was seen as the ultimate goal in the 1990s. Despite the EU lacking anti-corruption *acquis*, accession created a strong pressure for integrity management, among other things, for example, through strict procurement rules. In the opinion of the interviewees, next to the opportunities of learning from the international arena, one of the most important roles for the international level was providing politicians with incentives for reforms (Int1, Int2, Int4, Int8). As expressed by one of the public officials, “without international input it would have been very difficult to motivate politicians or respective ministers to change or fix something; it was the moving force there” (Int2). The motivating pressure from the international level was supplemented by the stance of local media (Int2, Int3, Int4, Int5, Int6) and, despite the rather modest NGO scene, the existence of one outstanding non-profit organisation focusing on integrity issues – Korruptsioonivaba Eesti, representing Transparency International in Estonia (Int1, Int2, Int3, Int4, Int6, Int8).

Politico-administrative actors have played a key role in the development of the system as interpreters of environmental pressures and enforcers or hinderers of the reforms. The importance of the political will to deal with the topic has been evident at several points in time. In addition to the early 1990s “Clean the house!” slogan, the political party Res Publica also ran with a clear anti-corruption platform in the 2003 parliamentary election. No other political party has made this issue its focus for the election campaigns. The exceptional role of the Res Publica party and its Minister of Justice in the coalition government (which lasted from April 2003 to April 2005) was highlighted also by the interviewees (“the only minister who has come with his own ideas on fighting corruption”, Int1)

The role of politicians in legislative drafting has changed over time. The 1990s policy development was largely focused on the political level, with members of the Parliament taking the lead in drafting the ACA in 1993 and Code of Ethics in 1998. However, all later amendments to these central acts were initiated by the government and drafted in ministries (in case of the 2015 Code of Ethics, by the Council of Ethics). Additionally, there have been some instances where political processes have been more of a hindrance in adopting new instruments, e.g., in case of delays in whistle-blower protection, lobbying rules, the 2009 draft of the ACA, etc. Although it has been argued that Estonia has differed from other post-communist countries that have been characterised by a lack of political commitment to integrity management reforms (Schmidt, 2007, p. 215), the interviewed experts were sceptical about the eagerness of the Estonian politicians to devote their energy and attention to these reforms. As argued by the interviewees, working on the issues of integrity management meant that one constantly needed to fight for the politicians’ attention and convince them of the relevance of the issues (Int1, Int2, Int3, Int5, Int6, Int8). At the same time, the interviewees recognised the importance of political will and

politicians' crucial role in the legitimization of the reforms ("if a politician says that it is a priority, then it is a priority", Int1).

Nevertheless, since the early 2000s, the development of Estonian integrity management has increasingly relied on the growing expertise of public administration to draft new legislation, propose priorities, establish training and advisory systems, and make use of policy analysis as an input. This trend has contributed to the sustainability of the integrity management system. The interviewees recognised the substantial role of public officials and their cooperation with external experts in the development and functioning of the integrity management system (Int1, Int2, Int3, Int4, Int5, Int6, Int7) to the extent that the officials were not only formally responsible for the issues, but „putting their heart into them“ (Int5). As was argued in Int1 “the power of public officials has been considerable and they have used it well”.

The system has functioned well despite lacking a single “anti-corruption agency”. This institutional choice reflects the general segmented nature of the Estonian administrative system (Sarapuu, 2011, 2012) and the decentralised nature of coordinating public service development and training (Randma-Liiv et al., 2013; Randma-Liiv et al., 2022). In accordance with the logic of the system, responsibility for integrity instruments has been divided between several organisations. According to the interviewees, such a solution has also been influenced by international examples (“there was no such agency in Finland, Sweden, or Denmark; not even in Germany”, Int3) and has been guided by the limited resources of Estonia (“we concluded that it would be expensive and we did not want to become involved in the fight for resources that usually comes with such separate anti-corruption agencies”, Int1).

This quality of the institutional setting may also explain the gradual development of a value-based system as the nature of the Estonian public administration has not supported the evolution of strong central capacity for managing compliance. Nevertheless, one lesson to be learned is that such a decentralised system requires competency in integrity management policies as well as administrative capacity not only from central coordinators, but also at the organisational level (including top- and mid-level management). Building such analytical and operational capacity has taken time and has required continuous incremental changes that cannot be solved by the quick adoption of new rules.

6. Conclusion

Due to high levels of corruption in post-communist countries, integrity management policies are extremely relevant in the context of systemic transformation. Failure to institutionalise necessary

integrity management and anti-corruption reforms may contribute to the failure of other reforms and economic development. Consequently, the case of how integrity management has become institutionalised in Estonia provides several valuable insights.

Most of all, integrity management analyses are frequently (especially with NIS assessments) snapshots focusing on the situation at a given moment, but largely disregarding the incremental process of adapting and implementing integrity policies over time. However, such snapshot analyses are limited in their explanatory power, as they cannot explain why policies have developed in a certain way, which factors have influenced them, and how the choice of instruments has been related to the wider framework of administrative, political, and economic reforms. A longitudinal institutional analysis fills that gap by outlining patterns in the choice of instruments and the development of integrity management functions. It analyses emerging capacities, setbacks, and the way of solving implementation issues.

The study above shows that the institutionalisation of the Estonian system was influenced by a combination of factors – the desire to overcome the country's communist legacy, pressure and examples from the international level, and the strategies of politico-administrative actors that shaped the development of the system. By looking into these factors, we find explanations for the resistance shown towards some integrity management instruments. It also illustrates the move towards more value-based instruments occurring in parallel with the decrease in perceived corruption, emerging analytical capacity, and gradual development of new functions. Such longitudinal analysis also reveals barriers to integrity management reforms, such as lack of expertise, lack of administrative capacity, and competing administrative reforms. The use of international role models reflects moving from a reliance on outside experience to increased local expertise, with more conscious policy learning and draft acts increasingly referring to practical implementation issues to be solved in the specific local context. Furthermore, only coordinated systematic implementation (including advisory and monitoring functions) between institutions and experts ensures the sustainability of integrity management. Although intense external pressure may result in the adoption of new integrity management instruments, their sustained implementation is dependent on the existence of ownership within domestic public administration.

Acknowledgements

This work was supported by the Estonian Research Council grant PRG1125.

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Annex 1. List of interviews

Interview	Institution	Date
Interview 1	Ministry of Justice	19 December 2023
Interview 2	Ministry of Justice	14 December 2023
Interview 3	Ministry of Justice	14 December 2023
Interview 4	Police and Border Guard Board	6 December 2023
Interview 5	Government Office	6 December 2023
Interview 6	Ministry of Finance	1 December 2023
Interview 7	Ministry of Finance	12 December 2023
Interview 8	National Audit Office	12 December 2023

Appendix 6

Publication VI

Sarapuu, K., Saarniit, L. (2020). Public Administration in Estonia: A Search for Identity. In: Bouckaert, G.; Jann, W. (Ed.). *European Perspectives for Public Administration. The Way Forward* (317–333). Leuven University Press. (ETIS 3.2)

European Perspectives for Public Administration

The Way Forward

*Edited by
Geert Bouckaert and Werner Jann*

LEUVEN UNIVERSITY PRESS



Published with the support of



and



Alexander von Humboldt
Stiftung/Foundation

Published in 2020 by Leuven University Press / Presses Universitaires de Louvain / Universitaire Pers Leuven. Minderbroedersstraat 4, B-3000 Leuven (Belgium).

Selection and editorial matter © Geert Bouckaert and Werner Jann, 2020
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Geert Bouckaert, Werner Jann, eds, *European Perspectives for Public Administration: The Way Forward*. Leuven, Leuven University Press. (CC BY-NC-ND 4.0)

ISBN 978 94 6270 203 5 (Paperback)

ISBN 978 94 6166 307 8 (ePDF)

ISBN 978 94 6166 308 5 (ePUB)

<https://doi.org/10.11116/9789461663078>

D/2020/1869/10

NUR: 759

Layout: Crius Group

Cover design: Frederik Danko

Cover illustration: nmann77, © Fotolia.com



Table of Contents

Preface to the EPPA I Book	11
Acknowledgments	13
About the Authors	15
I Introduction	
1 The EPPA Project <i>Geert Bouckaert and Werner Jann</i>	21
2 The Survey: A Long-Distance Conversation about the Future of Public Administration in Europe <i>Jana Bertels, Geert Bouckaert, Werner Jann</i>	43
II Public Administration and Futures	
1 From Public Administration in Utopia to Utopia in Public Administration <i>Geert Bouckaert</i>	71
2 Governing for the Future: Means, Ends and Disconnects <i>Paul Joyce</i>	85
3 Scenarios as Thought Experiments for Governance <i>Meelis Kitsing</i>	103
III Public Administration and Disciplines	
1 Public Administration and Disciplines <i>Thurid Hustedt, Tiina Randma-Liiv and Riin Savi</i>	129

- 2 Public Administration and Law 147
Martin Burgi
- 3 Seeing Public Bureaucracies Like a Sociologist: (A Plea Towards)
Reconnecting Sociology and Public Administration 163
Philippe Bezes

IV Public Administration and Cultures

- 1 Challenges in the Face of Diversities: Public Administration
in Spain as an Example 189
Salvador Parrado
- 2 The New Diversity: Increasing Ethnic Heterogeneity and its
Consequences for Public Governance 207
*Mark Bovens, Roel Jennissen, Godfried Engbersen and
Meike Bokhorst*
- 3 In Search of a Better Understanding of Cultural Diversity in
European Public Administration Research and Practice, with
a Focus on Religion and Language 225
Bogdana Neamtu

V Public Administration and Practices

- 1 Shadowland: The Poorly-Mapped, Underdiscussed Yet Vital
Interface Between Public Administration Research and Practice 249
Christopher Pollitt
- 2 Forms of Knowledge for the Practice of Public Administration 273
Edoardo Ongaro
- 3 Do we Practise What we Preach when we Teach (and
Research) Public Administration? 293
Raffaella Saporito

VI Public Administration and Country Perspectives

- 1 Public Administration in Estonia: A Search for Identity 317
Küllli Sarapuu and Leno Saarniit
- 2 Public Administration in France: The Shadow and Light of
a Revival 335
Jean-Michel Eymeri-Douzans
- 3 Public Administration in Germany: Precarious Present,
Promising Future? 351
Stefan Becker and Michael W. Bauer
- 4 Public Administration in Hungary: Emerging Dynamics in
an Illiberal Democracy 367
György Hajnal
- 5 Public Administration in Italy 387
Denita Cepiku, Marco Meneguzzo
- 6 Public Administration in the Netherlands: State of the Field 403
*Philip Marcel Karré, Martijn van der Steen, Zeger van der Wal,
and Thomas Schillemans*
- 7 Public Administration Research in Norway:
An Organisational and Institutional Approach to
Political Organisations 421
Per Lægveid
- 8 Public Administration in Portugal 439
Filipe Teles

VII Lessons and next steps

- Lessons and Next Steps 455
Geert Bouckaert and Werner Jann

1

Public Administration in Estonia: A Search for Identity

Küllli Sarapuu and Leno Saarniit

1 Introduction

The international debate on the public sector increasingly revolves around change – the need for innovation, creativity, agility and the capability to address new complex challenges. Even if all of today’s discussion about digital transformation, artificial intelligence, big data and global megatrends seems to detach us radically from the past, in Central and Eastern Europe (CEE) this demand for innovation and change still evolves against a somewhat different background than in consolidated democracies. The context of CEE has been shaped by recent systemic transformations, overcoming historical legacies and cultural interruptions. Perhaps this is most true of Estonia, which at the beginning of the 1990s had the sharpest break with the preceding system even among the Baltic states by reason of which the first year of independence and breaking out of the centralized soviet structure was named “Year Zero” (Lieven, 1993, p. 316), i.e. starting all over again. Knowing this context and exploring its nuances gives us insight into the shape of Estonian public administration as a field of study today and helps us to make some educated guesses about its nature and challenges in the years to come. Context matters and there are different layers of transformation to grasp with regard to both the past and the future.

CEE’s challenges of institutionalising public administration education and research in a situation where state sciences did not exist under the communist rule have been captured elsewhere (for example, Staroňová & Gajdushek, 2016). Importantly, the challenges were not technical but to a great extent substantial, and affected not only the nature of public administration as a field of study, but the very conceptualisation of the state itself and its core functions (see e.g. Drechsler, 2004; 2005). Consequently, the task of describing the landscape, relevance, and future of public administration in Estonia demands that attention is paid to both sides of the coin – the field and its environment. The snapshots capturing the evolution of public administration

as a field of study in Estonia (Randma, 2000; Kalev et al., 2008; Lauri, 2019) reveal continuous transformation and adaptation induced and moulded by relentless changes in the context –in the higher education system as well as the Estonian state and public administration. Both the field and the Estonian administrative system have been in search of their identity and the best fit in a turbulent environment. The following chapter attempts to depict public administration as a field of study in Estonia, its nature, context, relationships with actual practice, and potential elements of the future.

2 The field of public administration

In Estonia, the evolution of today's public administration programmes started at the beginning of the 1990s. Although the re-establishment of the state and the initial design of its structural elements were strongly influenced by the legacies and the example of the Republic of Estonia which was established in 1918 and occupied by the Soviet Union in 1940, public administration as a field of study had to be built up from scratch after the regaining of independence in 1991. In 1995, the chair of Public Administration was founded at the University of Tartu, after a few years of preparation. The establishment of the chair and the introduction of a corresponding curriculum demanded, among other things, translating the term “public administration,” which did not exist in the Estonian language (Randma, 2000, pp. 85–86). The Estonian counterpart “avalik haldus” is essentially a literal translation, but as a novel combination of two common words it was a term that was unknown to society at the time. In Tallinn, a joint public administration programme between Tallinn University of Technology (TalTech) and Tallinn University (formerly Tallinn University of Educational Sciences) was instituted in 1994 with the assistance of a Tempus programme (Kalev et al., 2008, p. 114). A few years later, the curriculum evolved into two separate programmes in the respective universities. The initiative of establishing public administration programmes in the 1990s was purely academic and not induced or coordinated by the Ministry of Education (Randma, 2000, p. 85). As elsewhere in CEE, the introduction of the curricula and their content was largely dependent on the individuals leading the work, and often required explaining what public administration as a scholarly field was (Randma and Connaughton, 2005).

Unlike other CEE countries, where the dominantly legal approach to public administration education prevailed (Staroňová and Gajduschek, 2016), in Estonia the programmes evolved from a foundation of social science and economics and combined different disciplines from the very beginning

(Randma, 2000). Furthermore, they often engaged Estonian lecturers who had been educated abroad or foreign lecturers hired with the help of international assistance. As the programmes were novel, interdisciplinary and drew on international experience, they became remarkably popular, attracting high numbers of students and the best high-school graduates. Consequently, in 1998, the Estonian Business School introduced a BA programme in public administration and became the first private institution to offer the degree (Randma, 2000, p. 86). Several other public and private institutions followed suit and started teaching public administration programmes with varying content and quality at a diploma or bachelor level. Such a proliferation of programmes was made possible by the neoliberal approach to the public sector reforms at the beginning of the 1990s which was also reflected in higher education. As a result, a very fragmented higher education market emerged with a considerable number of autonomous institutions and a competitive atmosphere. The number of institutions providing higher education grew from 21 in 1994 to 49 in 2001 (Estonian Quality Agency for Higher and Vocational Education, 2017). The increase in students of public administration was part of a rapid growth in students in social sciences in general. Notably, the overwhelming majority of them were self-financing as the contribution of the state to social sciences education was modest and in decline.

Nevertheless, this boom in public administration education lasted for less than a decade. By 2008, only the three original public universities were still teaching it. Other programmes were closed in the mid-2000s as they failed to obtain accreditation due to problems with the quality of the education and the difficulty of making the curricula profitable (Kalev et al., 2008). Remarkably, even after that, most of the public administration students were still paying for tuition and their studies were not financed by the state. As Kalev et al. (2008) calculated, at the time only about 15% of all the students in social sciences received state funding and the remaining 85% had to pay for their education.

In the following decade, public administration education saw some considerable changes yet again. These were induced both by reforms in the higher education system and institutions as well as the changing social scene. First of all, some major changes happened in the higher education system. In the 2009/2010 academic year, the European Credit Transfer and Accumulation System (ECTS) was introduced in Estonia. It happened in parallel with a substantial reform of the higher education quality assurance system whereby assessment of study programme groups was introduced instead of the accreditation of individual programmes. Based on the new system, a positive evaluation of a study programme group in an institution results in the Government of

the Republic granting a licence to provide education in the respective group. It is complemented by institutional accreditations. In 2009-2012, “transitional evaluations” of study programme groups took place, and since 2012 the evaluation of study quality is completely group-based. Second, in 2011 a momentous reform of higher education financing was initiated, resulting in “free higher education” since the 2013/2014 academic year. Since the reform, all students studying in programmes that are in Estonian, satisfy the requirements of their curriculum, and meet the stringent criteria of full-time study, have received tuition-free higher education. To provide tuition-based programmes in Estonian, the universities need authorisation from the Ministry of Education and Research, and it is considered a big exception. Tuition-based programmes in English are allowed. In order to cover their costs, public universities and state professional institutions of higher education receive performance support from the state budget which consists of baseline funding and performance funding. Performance funding is based on fulfilling performance indicators and adhering to the performance agreement signed with the Ministry of Education and Research. The reform caused significant budgetary tensions in the universities that have only grown in the following years.

Third, the general demographic and societal scene has also been problematic for public administration and social sciences (and humanities) in general. Demographic changes have resulted in contracting numbers of potential students. The number of students admitted to higher education institutions and the size of the student body have been shrinking since 2010 (Estonian Quality Agency for Higher and Vocational Education, 2017). The effects of the diminishing body of potential students have been amplified by more negative attitudes towards public administration studies. On the one hand, the officially declared priorities of the higher education system are emphasising applied higher education, technology and natural sciences. This has resulted in policies oriented towards reducing the numbers of students studying in the “business and administration” group. For example, between 2019 and 2022 TalTech is expected to reduce the number of students admitted to business and administration BA studies by 20% compared to the intake in 2017. On the other hand, the trend has also been supported by negative rhetoric in the media, where the problems of the Estonian labour market have been blamed on young people wanting to become “public managers,” probably drawing on the image from the beginning of the 2000s when business management and public administration studies were at the height of their popularity.

Altogether, every single reform in the higher education system and the more recent wave of structural reforms in public universities that has been oriented at consolidation and centralisation have forced public administration

programmes to reconsider their identity and formulate a rationale for their existence. Every such reform has brought with it changes in the existing curricula or often ended their existence. Consequently, by 2019 the public administration programme, once one of the most popular curricula in Estonia, had contracted drastically and is still taught only in two public universities – TalTech and Tallinn University. There are eight curricula that can be considered public administration programmes, but only three of them, which are taught in TalTech (one BA, one MA, and one PhD), can be characterised as “classical,” while the remaining five contain a public administration module or are more widely integrated political science programmes (Lauri, 2019). The TalTech public administration programmes are also the only ones that are still categorised as “business and administration” studies in Estonia; the rest of the public administration programmes have moved into the group of “social science” studies. In the University of Tartu – the cradle of the field in Estonia – there is practically no public administration left and the focus is purely on political science and international relations. The changes in Tartu started with the introduction of the Bologna system in 2002, when the distinct public administration curriculum disappeared at BA level, and was dealt the final blow (or one could say the fatal blow) with the move of the core public administration faculty to TalTech in 2006–2007.

While the general trend in the Estonian higher education system is the increasing introduction of English-language public administration programmes, especially at the MA level, in public administration the curricula have disappeared, rather than been turned into English public administration programmes. The English-language public administration programmes that do exist focus on topics that are more easily marketable internationally and have an EU and international relations focus or interdisciplinary ambition (for example, the Technology Governance and Digital Transformation MA programme in TalTech which combines economics, governance, public policy, technology and innovation). The different focal points and contents of the remaining programmes also reveal the different profiles of the institutions teaching them. While Tallinn University has evolved more towards political science, governance and public policy analysis, TalTech is combining classical public administration with economics and innovation studies and is a leading institution in the debate on the digital transformation of states. In CEE comparison, the Estonian public administration programmes are outliers due to the distinctively non-legal character of the curricula and the higher share of analytical courses (Staroňová and Gajduschek, 2016).

Compared to public administration education which has gone through turbulent developments over the past 25 years, public administration research

was much slower to pick up and reach an internationally acceptable level. In the higher education institutions with their short-lived public administration programmes, decent research never existed, and that was a significant aspect of their problems of assuring high-quality education. In the University of Tartu, once the leading centre of both public administration education and research, any competence largely disappeared together with the move of the core staff to TalTech. In 2019, the TalTech Ragnar Nurkse Department of Innovation and Governance is clearly the strongest and the most internationalised Estonian research institution in the field of public administration and has a very interdisciplinary approach that focuses on governance models and governance capacity, digital governance and digital transformation of societies, science and innovation policies, fiscal governance, different modes of public sector and cross-border collaboration, and governance of small states. The research undertaken in Tallinn University's School of Governance, Law and Society focuses mostly on political science, civic culture, local self-government and public policy analysis, and most notably education policy and migration. There is limited collaboration between the two institutions, both in education and in research. At the same time, inter-disciplinary cooperation in research and policy analysis in general is on the increase, but among institutions and disciplines outside the state sciences, for example IT, life sciences and human geography. This has been driven by financial incentives – the need to bring home research grants in a situation where social sciences and higher education in general are under-financed and research funding is scarce and competition-based. The impact of project-based financing of public administration study has perhaps been the greatest on doctoral studies where the topics of PhD dissertations are increasingly shaped by the research projects and the general performance management approach to higher education has directed attention to productivity and outputs rather than curiosity and individual growth.

3 The context

This kind of evolution of the field of study in Estonia reflects the turbulent environment of higher education as well as the change in the Estonian state itself. Estonia's development has generally been characterised as a success, and one of the fastest political and economic transformations in CEE, especially by outside observers. Estonia's 2017 human development index (HDI) value was 0.871, positioning the country in the very high human development category. The 2018 Corruption Perceptions Index of Estonia, published by Transparency International, reached an all-time high of 73 points out of 100

and set Estonia apart from all the other CEE countries. But perhaps Estonia has gained the most international attention and built a positive image through the quick digitalisation of the state and the transfer of a high number of public and private sector services to electronic platforms (for example, “Estonia, the Digital Republic” in *New Yorker* (Heller, 2017)).

This perceived success has its roots in the initial transition at the beginning of the 1990s, when the first elections carried out in accordance with the new constitution in September 1992 and the victory of the nationalistic-conservative anti-communist Pro Patria Union ensured a sharp break with the preceding system. Vast administrative changes followed, in terms of both institutions and people. The public sector was downsized, many state functions were privatised; the foundations of the organisational structure of the Estonian central government were laid down, and the legal-administrative framework for a merit-based public service was established. Until 2016, Estonian political, economic and social development was characterised by the domination of a neo-liberal worldview with all the governing coalitions being led by liberal right- or centre-oriented parties. Such an ideological disposition can be explained by the domination of *New Public Management* (NPM) at the time of the initial transition, the communist legacy of distrusting the state, and the Estonian cultural predisposition towards valuing independence and individualism.

Although the NPM-led approach to the state supported extensive reforms of the public sector and the abandonment of Soviet legacies, it had little to contribute to the affirmative conceptualisation of the state and its image as a positive form of organising joint living. The high uncertainty, enormous workload and intensive time pressure of the 1990s introduced a decentralised problem-solving approach that was further supported by the aim of overthrowing the legacy of the centralised and vast soviet public administration. The latter meant that the political elite was very cautious towards all manifestations of central coordination. By the time Estonia started to move towards becoming a member of the European Union, the segmented system had already been institutionalised. Although such a system promoted clear accountability for a number of policy issues and the accumulation of professional knowledge in individual institutions, difficulties emerged in ensuring the coherence of different policies, solving problems that involved several areas of government, and agreeing on joint solutions to deal with “wicked issues.” In 2011, the OECD Governance Review on Estonia was published (OECD, 2011). It concluded that Estonia operated a fragmented and decentralised public administration and that “the apparent ambivalence of politicians and administrative leaders regarding reforms seems to reveal

a lack of shared understanding about the role of the public administration for ensuring Estonia's future" (OECD, 2011, p. 21).

Although the report said little that was new to those familiar with the Estonian administrative system and relied on the information and opinion of local experts, it changed the governance discourse in Estonia and resulted in the Government's formal Action Plan to implement the recommendations of the report. In essence, the Plan and its following formulations became the public administration reform strategy in Estonia, which was mostly financed from the EU structural funds. Consequently, the European Social Fund (ESF) has been the main donor for Estonian public administration development. Transversal activities focusing on the administrative system have been at the centre of "raising administrative capacity" with the ESF's support. The role of the ESF in administrative development and reform has been so central that, in practice, the operational public administration programmes with their requirement of seven-year strategic planning have largely constituted the Estonian public administration reform programme.

What it implies is that until very recently the public administration system was hardly in the sphere of interest of politicians and that the development of public administration has consisted of a number of project-like undertakings. The administrative developments of the last few years that have taken place within the ministries' areas of governance have been dominated by mergers of institutions and measures of standardisation, optimisation and centralisation. This search for efficiency has been the defining characteristic of the reforms. Similarly, the public service system has mostly been approached through the lens of cost-efficiency and cutting back on the number of officials. The democratic aspects of public service and its role in carrying certain values in the state have been over-shadowed by the efficiency concerns. At the same time, Estonia has developed a very open position-based public service system where the responsibility for all the main components of the public service, such as recruitment and selection, performance appraisal, remuneration, training and development, are in the hands of individual organisations and their implementation is inconsistent (Randma-Liiv et al., 2020). In a situation where there is no tenure in the public service, no public service pensions, and public servants can be laid off as easily as in the private sector, the entire system is vulnerable to the application of un-meritocratic practices like politicisation, nepotism and misuse of power by individual managers. Despite this, the latest goals of public administration reform in Estonia still focus largely on efficiency and consolidation. In 2019, the declared political aims of the reform are a more efficient central government and reduction of the administrative burden; maintaining the current ratio of public sector

personnel in the overall workforce (which in practice means a decrease in public sector employment); and keeping the GDP percentage of public sector costs at the same level (public sector expenditure as less than 40.4% of GDP) (Ministry of Finance, 2018). Among other means, IT and e-solutions are seen as one of the key levers for increasing efficiency.

4 Links with practice

Conceptualising the scope and substance of public administration as a field of study is unavoidably related to the national context (Randma-Liiv and Connaughton, 2005). The context also shapes the relations between the field of study and actual practice. In Estonia, the links are influenced by the fragmented nature of the public administration system, the small size of public administration as an academic field, and the small size of the country in general. Only three member states of the European Union – Cyprus, Malta and Luxembourg – are smaller than Estonia with its population of 1.3 million (2017). Although one could expect that in a small state with personalised relationships and limited possibilities for specialisation and in-depth expertise (see Randma-Liiv and Sarapuu, 2019) there would be extensive links between academia and practice to make use of the scarce knowledge, this has not always been the case. Barriers hindering closer cooperation have come from both sides.

First, from the side of the administrative system, its *modus operandi* has often made it difficult to take advantage of the expertise in universities. The differences in timeframes, expectations and interests of the two sides have perhaps been the most obvious in the case of engaging academia in policy analysis and evaluation, which is often contracted out through procurement procedures and financed from the EU's structural funds. Obtaining know-how through procurement means that there is little room for flexible cooperation. Furthermore, there are formal limitations to consultation during the procurement process. Even in cases where universities have had the competence to provide the expected analysis, procurements have often failed. On the one hand, the deadlines set by administration tend to be too short for academia, both for submitting the tenders and providing the expected outputs. On the other hand, officials' limited competence or time shortages often result in vague or unrealistic calls with contradictory aims, over-regulation of methodological details, unworkable schedules underestimating the time needed for data gathering, writing, and gaining feedback, or reflect the inability of public institutions to use the data that already exist and are available to them.

The procurement-based approach reflects the widespread projectification characteristic of the Estonian public administration and the fragmentation of analytical activities.

A similar mode of operation and discontinuity has also prevailed in the organisation of civil service training, where the absence of a central civil service training institution and a limited budget have contributed to a patchy system that is not able to cover all the relevant subjects and target groups (except for the group of top civil servants whose training and development have been generously financed). Organisation of horizontal, system-wide training has been dependent on the EU structural funds, and coordination of the training of local government officials has been lacking. With regard to the latter, no understanding of the target-group or long-term strategies exist. Consequently, the training organised by individual public institutions has been heterogeneous and uneven. The central training of civil servants, coordinated by the Ministry of Finance, has been largely procurement-based and project-type in nature, inhibiting the institutionalisation of more stable networks and knowledge exchange.

With regard to the educational background of public officials, systemic demand for public administration education has been largely missing in Estonia. Although public administration graduates have been welcomed and gladly hired by the administrative system, the combination of a decentralised civil service system with market-type higher education regulation has created a situation where respective curricula are not requested from the universities. The development and content of public administration programmes have been fully dependent on the universities. Although programme councils usually include the “representatives of the employers” (i.e. someone from the civil service), the universities normally rely on their own best understanding of the field and international advancements in developing the curricula, rather than the day-to-day demands of practical public administration.

On the other hand, reliance on the practical demands would be accompanied by alternative tensions, represented, most of all, by different perceptions of what should be taught in universities. University curricula of public administration at BA as well as MA level tend to be oriented at the general nature and principles of public policy-making and implementation, trends that influence governance, and analytical skills. The arguments for such an approach derive from changing and turbulent environments where public officials must have critical analysis ability and some core values to anchor their choices. However, public managers expect fresh graduates to be able to “do things” and feel frustrated when they have to be taught how to use document management programmes for sending out official letters or

which forms have to be filled in for issuing building permits. The demand for academic education to be more skill-based or “technocratic” often manifests itself in discussions on the relevance of social sciences and their funding from the state budget in general.

The usual solution to the trade-off – internships – has so far not been sufficiently functional to overcome the tensions. Characteristically for the decentralised personnel management system of the Estonian civil service, there is no central internship programme and it is up to individual organisations (or even units) whether or not to offer any internship positions. Any information about these positions is available only on institutional websites, quite often simply providing a general e-mail address for contact. Public administration students mostly have to rely on their own initiative to find internship positions. More rarely, institutions publish internship offers that universities can distribute through students’ mailing lists. Often, public institutions feel that they do not have the time and human resources to provide needed support for the interns, so they prefer not to take them on at all. More systematic internship opportunities have been institutionalised in the Estonian Academy of Security Sciences which offers specialist education in certain fields such as customs, taxation, prisons and police work. For these fields, internship arrangements with individual government agencies are possible, which is not the case for universities which do not prepare students for working in one specific organisation or policy area.

Second, when looking at academia, several barriers to sharing the expertise and using it to serve society appear too. There are a number of aspects that work against closer cooperation with practitioners. Public administration as a field of study is quite small in Estonia, with few individuals who have to take care of research, teaching and academic administration. Their capabilities are often stretched to the limits. In addition to that, due to the general under-financing of higher education and almost absent baseline funding of research, the budgets of academic institutions are increasingly more dependent on winning competitive research grants. Consequently, due to considerable opportunity costs, academic units and individuals have limited incentives to go after the short-term funding of policy analysis. Large research grants tend to provide more stability than applied studies offering a part-time salary for a couple of people for a restricted time-period.

Difficulties in cooperation also result from different timeframes and interests, not just tight resources. An academic unit that plans its workload months in advance based not only on teaching obligations but also schedules imposed by international research projects, is quite often not able to fit a short-term, strict deadline analytical job into its timeframe. The same applies

to in-service training projects. Furthermore, the questions asked and topics explored do not necessarily match either. Research staff are selective in undertaking applied studies as the questions asked for making policy decisions are often too narrow or too different from the questions that interest the researchers. The need to satisfy the pressure for international publication and the increased impact factors in combination with growing attention paid to specific methodological solutions do not always combine easily with the practical needs of public institutions. All these factors work against investing one's time in applied activities. Consequently, these have to either be personally intriguing, provide empirical information for further academic research endeavours, bring in additional salary, or rely on academics' sense of mission. Otherwise, the projects often present more of an onus than an opportunity. However, this can lead to further widening of the gap between scientific and applied studies, followed by decreased trust and understanding of each other's perspectives.

Different timeframes, the temporary nature of project-based financing, academic performance management systems, the interests of practical policy analysis, differences in language and aims of study, lack of capabilities – all these factors have proved to be obstacles to cooperation as well as trust. Nevertheless, this does not mean that the relations between academia and practice have been only problematic or non-existent. There are several examples of good cooperation with significant impact. These instances of rewarding cooperation have taken traditional as well as more innovative forms. More traditionally, members of academia have consulted on policy processes, informally as well as formally (e.g. drafting of the new Civil Service Act, analysis of innovation and research policies in Estonia), have conducted in-service training for public officials (from new recruits and future leaders to mid-level managers and top civil servants, on topics as various as strategic and financial management, coordination, mission-based policy design and public service ethics), have served as members of governmental committees, and have conducted policy evaluations. In addition, several innovative ideas and projects have been implemented. For example, the Ragnar Nurkse Department of Innovation and Governance, TalTech, has been coordinating the biggest EU Horizon2020 innovation project “TOOP” (The Once-Only Project) focusing on better exchange of business-related data and documents with and between public administrations in the EU. The Nurkse Department has also implemented the Sohjoa Baltic project in cooperation with the city of Tallinn, resulting in a self-driving minibus being given over to public use.

Another noteworthy example of interaction between academia and civil service is the field of public service ethics, where the expertise existing in

the universities has contributed to the evolution of ethics-related debate and the introduction of respective institutional structures over a time-period extending over several years or even decades. Academic public administration staff (at the time from the University of Tartu) became involved as early as in 1998, when the drafting of the first public service code of ethics began (Saarniit, 2006). A few years later, when the first anti-corruption strategy was discussed, the idea of a public service ethics council was mooted. This idea was discussed thoroughly in 2009, including during meetings between the Government Office and the (then) Department of Public Administration of TalTech, focusing on the membership, tasks and scope of the proposed council. The ethics council was finally formed in 2013, after the new Civil Service Act came into force. From the beginning, the council has included “external” members from universities (TalTech and the University of Tartu), not only from the field of public administration, but also from philosophy and journalism. The council has adopted a new code of ethics (2015), several good practice guidelines, and consulted on draft regulations on preventing conflicts of interest and given opinions on specific cases of unethical behaviour. Although the council is not as visible as it could be (for example, by being more proactive), it represents a good case of academia-practice cooperation, which is also evident in the civil service ethics training system. Currently, the main ethics trainers include civil servants, representatives of anti-corruption non-profit organisations, as well as members of academia from TalTech.

At their best, similar cooperation endeavours have benefited both sides – practitioners have gained analytical and knowledge-based support in everyday work and researchers have obtained empirical data for scientific publications and formulating new research questions. Still, this cooperation of academia and practice has much room for improvement, and it could benefit from having more “pracademics.” Although there are several consultancies and one main think-tank, Praxis, that mediate academic knowledge to the administrative system, the merging of academic and civil service careers is still rare. Civil service jobs tend to be full-time positions that do not make it easy to conduct research or teach students. Those who leave academia usually do not return. However, as the Estonian Civil Service Act, which regulates civil servants’ auxiliary activities, makes an exception for pedagogical and research activities in educational institutions as a permitted activity (e.g. tax officials teaching tax law in a university), there is a way for the experts of public administration practice to be engaged in academia. In a way, the Estonian legal system recognises the small state issue of limited expertise and provides for the best use of it. Still, combining the two careers is usually sporadic and

temporary. Public officials teaching in universities tends to be a short-time solution, sensitive to changes in workload, and presents a potential risk to continuity and stability in teaching. Luckily, civil servants are usually open to being involved in academic courses on a more *ad hoc* basis and happy to accommodate invitations to meet students and share their work experiences.

5 The future

In Estonia, public administration as a field of study has gone through considerable changes, in terms of research as well as teaching, in terms of volume as well as substance. The field has evolved in the context of wider societal and economic transformation. Developments in higher education as well as in the administrative system have forced the academic field to define and re-define its identity and to cope with transformative pressures while maintaining its distinctive nature. The pressure to find its unique essence and its place in the scientific and educational landscapes, both in Estonia and internationally, as well as to establish a healthy relationship with the world of practice, can also be expected to be the signature tune for the future.

When looking at tomorrow, the Estonian state and its public administration are facing several demanding questions. For example, how to cope with “global megatrends” in economic, environmental, social and technological spheres as a small state in the European periphery; how to uphold the trust of the people and meet their increasing expectations towards the state while the Estonian society, somewhat controversially, still believes in a lean state as the ideal; how to maintain the earlier success of the digital state without getting locked into unproductive paths and technological solutions; and how to find a good balance between innovation and stability. The country needs a smart, innovative and merit-based public administration that provides a professional and evidence-based perspective on the policy processes during times of political fluctuations and populist calls that are currently increasingly evident and influential in Estonia, as well as elsewhere. All those processes and challenges obtain an additional layer in the context of digitalisation that transforms the role, aims, relationships, problems and solutions of public governance. It changes the functioning of politics and of the media. In the end, the difficult choices land on the desks of individual public officials and politicians who need to be well equipped for making decisions on issues comprising uncertainty, complex alternatives and moral dilemmas.

Public administration as a field of study should have an important role in helping its practitioners to make sense of those complex problems and make

decisions in the best possible interests of society. The ability of the field to do that depends on its health and strength. If the existing trends continue, then public administration as an academic field in Estonia is on its way towards further consolidation, or perhaps even fading away, at least in the form of “classical public administration.” In public administration education, the trend is towards more political science, technology, and management, as well as teaching practical skills. In public administration research, there is a tendency towards analysing different spheres of public policy, their interaction with megatrends, and dissecting the nature, challenges, and impact of digitalisation.

The essence and the functioning of public administration have been highly dependent on the individual people active in the field. Considering the smallness of the field and the state, it can also be expected to be so in the future. Individual professors and programme managers have been those who have conceptualised the field of public administration in the midst of changes, have interpreted the environmental pressures and viable ways forward, and have shaped the face of public administration as a field of study. Several of the professors who assisted with the birth of academic public administration in Estonia are still there in 2019 and have represented the continuity of the field in the otherwise changing higher education landscape. The future will depend on their legacy, descendants and the viability of the field in an increasingly competitive and under-financed academic system where starting a career as a young researcher demands a lot of determination and patience.

With regard to all the significant issues, public administration as a field of study should be there to help the public administration system to find the best responses to all the challenges, questions and dilemmas mentioned above, not only by offering expertise, but also by being critical and providing alternative interpretations of the problems and solutions. This is something that happens increasingly in cooperation with other fields of study or disciplines, all across the academic landscape. The issues related to the future governance of Estonia need attention both in their entirety, but also in their more detailed aspects like the nature of merit-based civil service in the age of populist democracy, the value choices of public officials in the era of digitalisation, the opportunities for collaboration and network-type coordination in designing and implementing policies in complex policy areas, especially those affected by the “megatrends,” the challenges, opportunities and ethical aspects of using big data, etc. Public administration as a field of study can support the public administration system and practitioners through educating public officials, participating in providing in-service training, policy analysis and evaluation, and making research and international knowledge available and

understandable to domestic decision-makers. To succeed in that, the interest and capabilities of the public administration system in making use of the expertise also need to exist.

Acknowledgements

The writing of this chapter was supported by Estonian Research Council grant PUT1461. The authors are grateful to the civil servants who shared their thoughts on the relevance and needs of public administration education in Estonia.

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ISSN 2585-6901 (PDF)
ISBN 978-9916-80-124-6 (PDF)