

## Chapter 8. Cultivating a culture of integrity across society in Argentina

*This chapter covers Argentina's efforts to cultivate a whole-of-society culture of integrity. It assesses the current integrity issues facing Argentine society, drawing from perception surveys describing the impact of corruption on society. This chapter also highlights the need for the Anti-Corruption Office to raise awareness in society on integrity in order to promote greater ownership amongst citizens about their shared responsibility for nurturing society's integrity values. In addition, this chapter highlights the necessity of providing guidance to the private sector on cultivating cultures of integrity within companies. As well, it identifies the need to implement education programmes for children and young people into the existing civics curriculum.*

## 8.1. Introduction

Public integrity is not only an issue for the public sector; citizens, civil society organisations and firms are also active members of society and their actions can affect integrity in their community. Citizens have three core roles: first, as watchdogs of government officials and politicians, citizens can hold officials accountable for the promises they make and the actions they take to prevent corruption and cultivate public integrity. Second, citizens play a critical role in setting the public agenda and influencing public decisions, including integrity and anti-corruption issues. Third, citizens and firms are also active members of the community and have a responsibility to promote public integrity more broadly in society. When citizens and/or firms pay bribes, evade taxes, receive fraudulent social benefits or exploit public services without paying, they unfairly take government resources and undermine the fabric of society. Similarly, citizens are employees of the private or public sectors, where they are expected to comply with public integrity obligations.

Taking a whole-of-society approach to fighting corruption therefore should be at the heart of a strategic approach to any government's anti-corruption policy. To this end, governments can promote a culture of public integrity by partnering with the private sector, civil society and individuals, in particular through:

- Explicitly acknowledging in the public integrity system the role of the private sector, civil society and individuals in respecting integrity values in their interactions with the public sector and with each other.
- Encouraging the private sector, civil society and individuals to uphold those values as their shared responsibility by:
  - Raising awareness in society of the benefits of integrity and reducing tolerance of violations of public integrity.
  - Carrying out, where appropriate, campaigns to promote civic education on public integrity among individuals and particularly in schools.
- Engaging the private sector and civil society on the complementary benefits to public integrity that arise from upholding integrity in business and in non-profit activities, sharing and building on, lessons learned from good practices (OECD, 2017<sup>[11]</sup>).

## 8.2. Raising awareness in society of the benefits of integrity and reducing tolerance of violations of public integrity

### *8.2.1. The Anti-Corruption Office could take an active role in communicating to citizens their roles and responsibilities for respecting public integrity.*

Citizens are well aware of corruption and its prevalence in society. As such, raising awareness is not a question of educating about the existence of corruption, but rather about how to break the cycle. To break the cycle however, the responsible anti-corruption communications body must first have a clear understanding of what to communicate, using evidence rather than impressions. This entails understanding what the main corruption and integrity challenges are, and devising a clear, measurable and impactful strategy for communications.

In terms of the context, in Argentina the number of people reporting to have paid a bribe in the past 12 months is less than 10 per cent of the population over all sectors (except for

police services) (Table 8.1). With the exception of police services, in Argentina the range is lower or equal to the LAC range.

**Table 8.1. Petty bribery in Argentina is low**

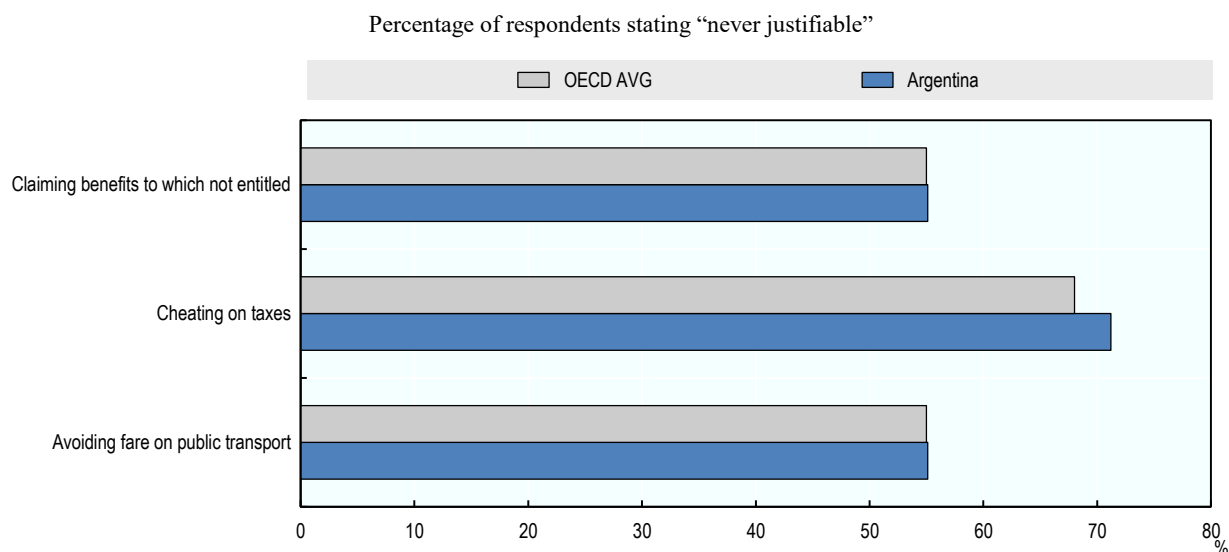
Range of population reporting to have paid a bribe per sector in previous 12 months (2017)

	ARGENTINA	MAJORITY OF LATIN AMERICAN COUNTRIES	LEGEND	
School	◆	□	◆	1-10%
Hospital	◆	●	□	11-20%
ID Document	◆	□	●	21-30%
Utilities	◆	□	❖	31-40%
Police	□	□	■	41-50%
Courts	◆	◆	○	51%+

Source: (Transparency International, 2017<sup>[2]</sup>).

In turn, surveys suggest that citizens reject integrity breaches, such as cheating on ones' taxes, avoiding the fare on public transport and accepting social benefits that one is not entitled to (Figure 8.1).

**Figure 8.1. Strong rejection of rule-breaking norms**



Note: OECD Average includes Australia, Chile, Estonia, Germany, Japan, Mexico, Netherlands, New Zealand, Poland, Slovenia, Korea, Spain, Sweden, Turkey and the United States.

Source: World Values Survey, Wave Six (2010-2014).

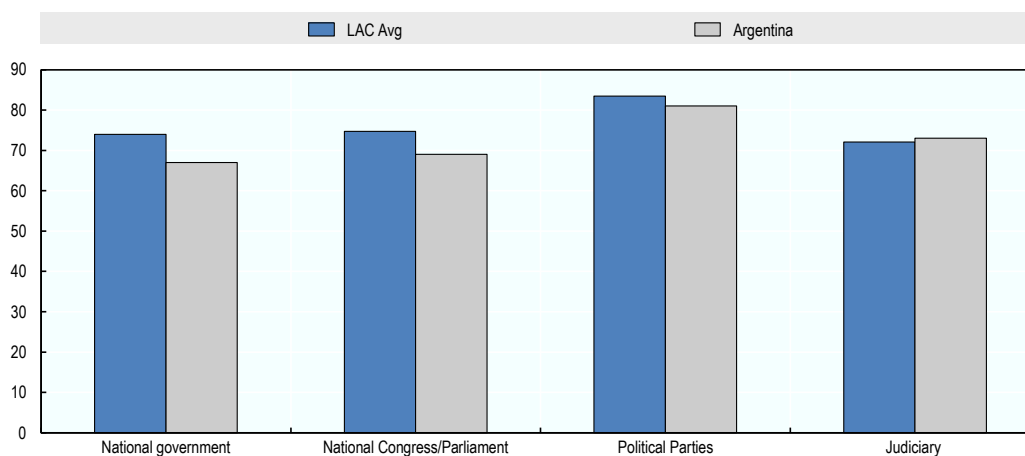
A gap exists however between the rejection and the justification of integrity breaches for various reasons. For example, the recent Latino Barometer found that 35 per cent of the respondents would tolerate a certain amount of corruption as long as the problems of the country are solved (as compared to the LAC average of 40 per cent) (Latinobarómetro, 2017<sup>[3]</sup>).

Justifying the corrupt acts of politicians was another finding by the *Centro de Opinión Pública* of *la Universidad de Belgrano*, with 55% of respondents stating that a corrupt politician was acceptable or tolerable if they solved important problems in the country or

improved the economy (Centro de Opinión Pública de la Universidad de Belgrano, 2013<sup>[4]</sup>). A recent finding by the same group found that 54% of respondents felt that Argentina was more tolerant of political corruption as compared to other countries (Centro de Opinión Pública de la Universidad de Belgrano, 2016<sup>[5]</sup>).

Moreover, a trust gap exists between Argentine citizens and public institutions. As shown in Figure 8.2, the majority of citizens express low levels of trust for major institutions (National Congress, political parties, the judiciary and the national government). With exception of trust in the judiciary, the values are slightly better than the regional average, but still reflect a high level of distrust. Coupled with poor service delivery, the low trust levels could have contributed to clientelism's entrenchment across the country, with the political parties seen as more effective in meeting the needs of the population than the state (see chapter 7).

**Figure 8.2. Percentage of respondents expressing little / no confidence**



*Note:* LAC average includes: Argentina, Bolivia, Brazil, Chile, Colombia, Costa Rica, Dominican Republic, Ecuador, El Salvador, Guatemala, Honduras, Mexico, Nicaragua, Panama, Paraguay, Peru, Uruguay and Venezuela.

*Source:* Latinobarometer 2017, <http://www.latinobarometro.org/latOnline.jsp>.

In addition to justification of corruption, public opinion about the effectiveness of anti-corruption reforms remains low: the 2017 Latinobarometer found that 64 per cent of Argentineans indicated that little to nothing had improved in the corruption situation over the previous two years (while in the LAC region 62 per cent had a similar concern) (Latinobarómetro, 2017<sup>[3]</sup>). Moreover, the recent Transparency International Global Corruption Barometer found that 41 per cent of citizens felt that corruption had increased over the previous 12 months (prior to when the survey was conducted) (Transparency International, 2017<sup>[2]</sup>).

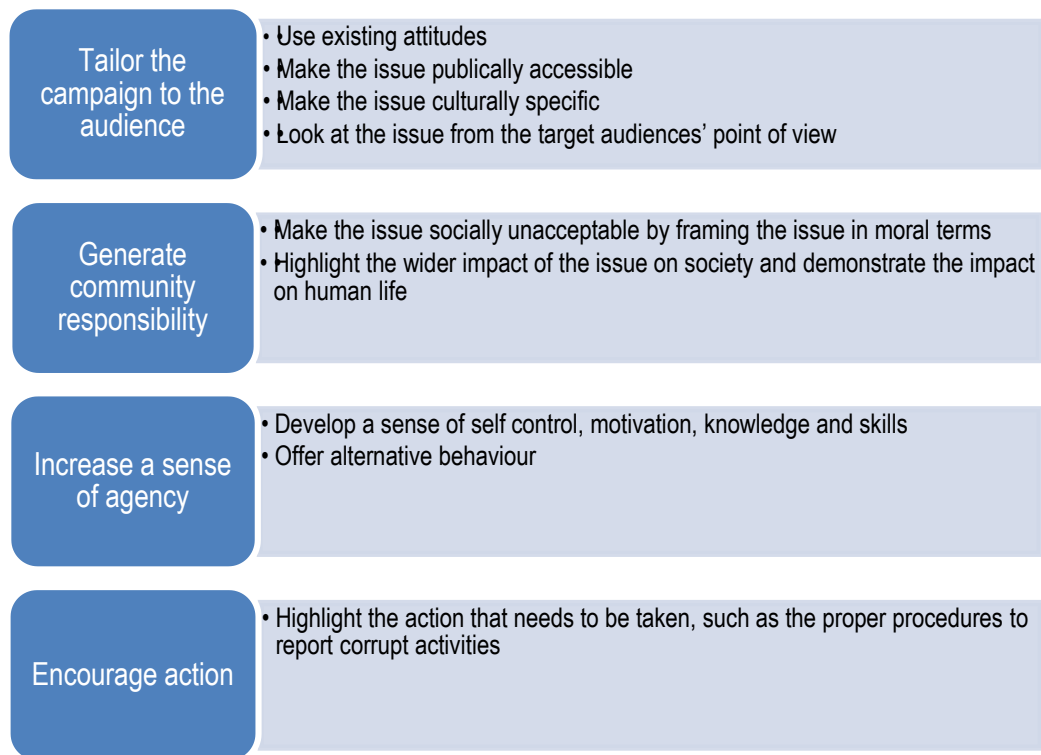
Challenging the social norms that justify integrity breaches, the reliance on clientelistic systems, and the low perceptions of government effectiveness in the fight against corruption is necessary for implementing the Argentine government's wider integrity agenda. Indeed, when the prevailing social norms justify corruption, legal and institutional reforms for integrity will not be successful. Moreover, when surrounded by social norms that justify corruption, evidence has found that individuals are more tolerant to corruption breaches themselves (Fisman and Miguel, 2008<sup>[6]</sup>; Barr and Serra, 2010<sup>[7]</sup>;

Gachter and Schulz, 2016<sup>[8]</sup>). A coordination problem emerges, with citizens feeling discouraged in attempting to overcome corruption.

Challenging these social norms requires dedicated and targeted awareness campaigns, which should not only challenge existing norms, but also communicate and demonstrate the expected social norms. As noted in Chapter 2, one of the OA core mandates is to strengthen the ethics and integrity of the national public administration. The OA's communication activities therefore focus on raising awareness of corruption and prevention tools within the public sector, and communicating these efforts to the wider society. These communication activities have two benefits: first, by communicating to public officials about their anti-corruption responsibilities, the OA helps initiate behaviour changes in the public sector. Second, by communicating the responsibilities of public officials to society, the OA raises society's awareness of the higher standard of behaviour to which public officials must adhere.

The OA however could also use campaigns as a way to challenge corruption and generate integrity norms in society. As awareness campaigns and integrity training programmes aspire to create behavioural changes across society over a longer period, the appropriate institutional structure should be implemented to ensure continuity. To that end, a whole-of-society communications unit could be institutionalised within the OA under the Subsecretariat of Integrity and Transparency, and assigned responsibilities for conducting awareness raising programmes amongst Argentine citizens. Once established, the whole-of-society communications unit could develop a communications strategy that identifies a series of awareness raising campaigns and the appropriate timeline for each. For each of the campaigns, the strategy should identify the expected outcomes (e.g. attitudes or behaviours to change, skills to develop), the target audiences, the key messages and the communication channels (e.g. television, web, social media, print media) as well as the evaluation mechanisms (e.g. opinion surveys, web analytics, participation in events, number of complaints submitted, etc.).

As there is widespread justification for integrity breaches in society, the strategy of awareness-raising should be twofold. The first aim should be to generate community responsibility, building on the widespread rejection of corruption and focusing on corruption's costs for the economy and society (see Figure 8.3). The awareness raising campaigns should not sensationalise the issue and instead employ credible and authentic evidence, to enable recipients to identify with the core messages (Mann, 2011<sup>[9]</sup>). Moreover, the awareness raising campaigns should challenge the justification of unethical behaviour and create a link between one's own integrity and the wider public benefit. While the vast majority of people do not like to harm others (Camerer, 2011<sup>[10]</sup>), in the case of corrupt behaviour the damage done often remains abstract and not directly linked to another individual, thereby facilitating justification (Barkan, Ayal and Ariely, 2015<sup>[11]</sup>). Challenging these behavioural caveats therefore requires linking awareness-raising to actual dilemmas where citizens understand how their actions can have a negative impact on the wider goals of the community.

**Figure 8.3. Behaviour changing campaigns success factors**

Source: (Mann, 2011<sup>[9]</sup>).

The second aim should be to increase citizens' agency by developing individual motivation and encouraging action (see Figure 8.3). This should go beyond communicating about the prevalence of corruption and the government's efforts to prevent it and offer tangible solutions for citizens to uphold public integrity. Indeed, evidence has found that small norm prompts can positively influence the actions of an individual who is faced with a corrupt scenario (Köbis et al., 2015<sup>[12]</sup>). This could be accomplished for example by offering different solutions (such as how to report corruption or how to partner with public officials to uphold integrity) and identifying alternative behaviours to corruption. Box 8.1 provides an example of the awareness raising campaign in Peru, which identified small changes Peruvians could make to support a culture of integrity.

### Box 8.1. Peru's High Level Commission Against Corruption #Peruanosdeverdad Campaign

In Peru, the High Level Commission against Corruption (CAN) launched the campaign #PeruviansForReal (#Peruanosdeverdad) in 2016 as part of their integrity strategy. The campaign, which includes a YouTube video, aims to counteract the norms that undermine the integrity of Peruvian society by providing positive, new norms to promote change. The video begins with a series of integrity breaches, ranging from paying bribes, to breaking traffic rules, to other forms of civil disruption such as assault and petty theft. The statement: *The change that Peru needs begins with oneself* follows the images. This statement was then followed by a series of shots of citizens, each holding up a placard with messages for integrity. Such messages included #PeruviansForReal *comply with the law* and #PeruviansForReal: *we don't pay bribes*. Citizens of all ages are included in the video, and the final message is delivered by a Peruvian footballer who asks citizens "how can we expect the authorities to act with integrity and make the country better when we do not do those things ourselves?"

A longer version of the same video also includes messages from the Coordinator General of the CAN, who appealed to the integrity of Peruvians, noting that even though Peruvians are perceived as non-compliant citizens, they are honest and able to be part of a change for integrity in Peru. The President of the CAN also appeared in the video, asking citizens to be part of the change for integrity. Moreover, instead of noting that the change in Peru needs to begin with Peruvians, the video asks "*Do you know what it means to be 'Peruanos de Verdad'?*" Like the shorter version, shots of citizens holding up placards with messages of integrity are they shown.

Source: <https://www.youtube.com/watch?v=Iqmhp4hYvos>;  
[https://www.youtube.com/watch?v=qRFpzI\\_aJiQ&t=285s](https://www.youtube.com/watch?v=qRFpzI_aJiQ&t=285s). Date retrieved 19.12.2017

The OA could therefore consider developing an awareness campaign that communicates success stories from effective behaviour changes throughout the government. The campaign could highlight "everyday ethical public officials" who have helped change the way their team works for integrity in the Argentine government. The campaign could focus on a core set of values that these officials' exhibit and what it means for them to fulfil their public role with integrity. The officials pledge to honour these values as a matter of respect towards the public they are serving and ask the citizens to return this respect by trusting them to serve in the public interest (Box 8.2).

### Box 8.2. Phrasing and framing: it matters how we talk about integrity

Problem-centred communication can be discouraging. Public debate, articles in the media and awareness raising campaigns often feature corruption as a problem, running the risk of making corruption a self-fulfilling prophecy (Gingerich et al., 2015<sup>[13]</sup>). The perception that corruption is common in society makes integrity breaches seem more justifiable, with citizens thinking, “this is just how things work in this country”. This can lower the moral burden of an integrity breach, with citizens less inclined to change their behaviour to serve a greater good and feeling as though their individual action makes no difference.

Engaging with the public is an opportunity for integrity policy makers to make their efforts seen and shape a positive debate. Communication efforts should therefore feature integrity instead of focusing on corruption. Awareness raising campaigns could highlight integrity as a reciprocal norm that is worth investing in. Such campaigns should be personal, actionable and social. Integrity communication should convey messages of personal relevance, but with respect to the context and social norms and limited scope of action that the recipients find themselves in.

Citizens’ perception might also be impacted by more indirect communication. Integrity policy makers could, for example, publish their efforts and advancements in a regular Monitoring and Evaluation report and engage in a pro-active dialogue with media. Furthermore, they could publicly emphasise positive role models, e.g. by tendering an integrity award or publish stories of success, e.g. a portrait of an everyday ethical public official.

Where this strategy succeeds, it serves two functions:

- The re-connection of ethical dilemmas with the moral self and the re-evaluation of an established behaviour with respect to the moral reference point.
- The dissolution of the collective action problem through reinstatement of a sense of control and personal responsibility. Both objectives might be easier achieved for a specific integrity problem in a targeted group than for corruption in a whole society.

Source: adapted from (OECD, 2018<sup>[14]</sup>).

Government entities responsible for delivering services in areas susceptible to fraud and corruption, such as tax collection and distribution of social assistance, could also leverage awareness raising programmes to build capacity for integrity amongst citizens. Through Memorandum of Understanding, the OA could partner with entities that deal with areas susceptible to corruption and fraud, including, but not limited to: the Ministry of Labour, Employment and Security (*Ministerio de Trabajo, Empleo y Seguridad*), the Ministry of Health (*Ministerio de Salud*) and the Ministry of Social Development (*Ministerio de Desarrollo Social*), to develop and implement integrity and anti-corruption awareness raising programmes for citizens in their respective areas. Such programmes should be tailored to the specific high risk areas (unemployment insurance fraud, health insurance fraud and other types of social benefit fraud, etc.), identifying the roles and responsibilities for citizens in respect of that area.



The awareness raising and identity forming measures suggested above (and Chapter 3) could be supported by behavioural interventions creating salience for moral norms and identities. Small cues, such as a pin public officials wear to indicate their adherence to integrity values, can refer back to the content of a campaign and create awareness for integrity values in the incident of interaction between citizen and public official. Playful referrals in the direct interaction between citizens and public officials can help to create a personal connection to the content of a reform of campaign. The success of such measures, however, depends crucially on the credibility of the content they are referring to.

### 8.3. Engaging with the private sector to uphold integrity in business activities

#### *8.3.1. The guidance prepared by the Anti-Corruption Office could emphasise how to go beyond cosmetic compliance programmes.*

The private sector is a key partner in the public integrity system. On the one hand, firms that evade taxes, collude with each other, offer bribes or illegal political contributions, engage in procurement fraud, or seek to influence public policies exclusively in their favour at the expense of the public good reduce competitiveness and create negative economic externalities, as well as undermine the legitimacy of government and trust in markets. On the other hand, the private sector can also be a force for good. Across sectors, it has been a driver for change, advancing corporate integrity reforms and reshaping the global integrity landscape (UNODC, 2013<sup>[15]</sup>). The public sector is advancing efforts to support integrity practices in companies, applying a range of tools from incentive regimes to mandating business integrity programmes.

Recognising the positive role that the private sector plays, the recent Law on Corporate Criminal Liability for Corruption Offences includes a provision for business integrity programmes. The law takes a risk-based approach, with Article 22 requiring companies to implement a business integrity programme based on the specific risks of their size and commercial and economic activity. Article 23 of the law requires the business integrity programme to contain three core elements – a code of conduct or ethics; rules to prevent unlawful acts during bidding, contract implementation or other interactions with the public sector; and regular training sessions on the business integrity programme for members of the company. As well, it proposes ten additional elements that could be included, depending on the company profile. The law also provides some incentives for company compliance. While not mandatory for all companies, a business integrity programme is a prerequisite for access to procurements over a certain threshold, including public works, public-private partnerships, and the contracting of goods and large-scale services (article 24). The existence of a business integrity programme may also help mitigate penalties for legal entities that breach the Law on Corporate Criminal Liability (article 9).

Decree No. 277/18 assigns responsibility to the OA for establishing principles and guidelines that translate articles 22 and 23 into practice for companies. The OA is preparing a set of integrity guidelines for the private sector (“*Lineamientos de integridad para personas jurídicas*”). Guidance for state-owned enterprises is already provided in the general directives that outline good governance guidelines for state owned companies (“*Lineamientos de Buen Gobierno para Empresas de Participación Estatal Mayoritaria de Argentina*”).

While the law is clear on the elements of the integrity programme, an ‘integrity culture’ perspective could inform the Guidance prepared by the OA. Often, compliance systems

are cosmetic additions, implemented to respond to government requirements and get sanction ‘credit’ but failing to effectively prevent unethical behaviour (Langevoort, 2016<sub>[16]</sub>; Krawiec, 2003<sub>[17]</sub>). Coupled with this are findings from behavioural sciences that show that compliance systems focusing on control and sanction can crowd out intrinsic motivation for integrity, leading to diminished capacity for ethical behaviour (Lambsdorff, 2015<sub>[18]</sub>). These findings, supported by continued corporate malfeasance, have led to calls from the public sector to focus on ethical cultures. As Langevoort (2016<sub>[16]</sub>) states,

*What regulators are saying in emphasising culture is that the credit a company gets depends not only on the structural elements of compliance best practices, but how willingly and well “it” commits to a greater level of precaution and law abidingness than is crudely rational from a cost-benefit perspective.*

Building on recent research on effective organisational integrity cultures (see for example (Taylor, 2017<sub>[19]</sub>)), the OA could include a chapter in the guidance it prepares that discusses how to build an integrity culture across the organisation. This could involve guiding companies to think about how the various levels of their organisation interact, and where aspects of the organisational culture could support or hinder ethical behaviour. Guidance could focus on issues like leadership example and commitment, rewards and bonus structures, organisational voice and silence factors, internal team dynamics, and external relationships with stakeholders (Taylor, 2017<sub>[19]</sub>). Table 8.2 identifies factors that could be leveraged to cultivate integrity.

**Table 8.2. The five levels of an ethical culture**

Level	Description
Individual	How individual employees are measured and rewarded is a key factor that sustains or undermines ethical culture. In the face of pressure to meet growth targets by any means necessary—a belief that the ends justify the means—unethical behaviour is to be expected. Therefore, the rewards system is an excellent place to start. Diversity and inclusion initiatives enable individual employees to bring their whole selves to work: Employees who feel it unnecessary to hide aspects of their social identity to fit into the dominant culture will experience less conflict between personal and organizational values and will express themselves more confidently—making them more inclined to raise concerns about ethics.
Interpersonal	Organisations can also focus on how employees interact across the hierarchy. Abuse of power and authority is a key factor that degrades organizational culture. When decisions around promotions and rewards seem unfair and political, employees disregard organisational statements about values and begin pursuing their own agendas. Building an ethical culture from an interpersonal perspective requires meaningful protections that empower all employees and stakeholders, even the least powerful, to raise concerns and express grievances. Leaders must recognise the outsized role they play in setting culture and driving adherence to ethics, and they must learn to exercise influence carefully.
Group	Socialisation into group memberships and relationships is a core aspect of human culture. At work, the key determinant tends to be an employee’s group or team. As organisations become more geographically diffuse and loosely aligned, it becomes harder to set and define consistent organisational culture. Focusing on team conditions can empower middle managers to feel responsible for changing culture and group dynamics to foster more effective ways of working. Similarly, while clarity in roles and tasks is key to a successful team, so is psychological safety. If employees feel secure in taking risks and expressing themselves, teams will be more creative, successful, and ethical.
Intergroup	The quality of relationships among groups is critical to consider in any attempt to build an ethical culture. Celebrating a team whose high performance may stem from questionable conduct gives it power and a mystique that is difficult to challenge, and this can undermine values across the organisation. Teams working in sustainability or compliance often need to scrape for power and resources; when members are attached to matrixed working groups, accountability can get watered down.
Inter-organisational	Most discussions of organisational culture focus on internal relationships. Still, employees are keenly conscious of how a company treats suppliers, customers, competitors, and civil society stakeholders, so building and maintaining stakeholder trust will improve organisational culture. Moreover, companies need to ensure that their values and mission statements amount to more than words on a website. Business success and core values are not contradictory concepts. That said, building an ethical culture sometimes means walking away from lucrative opportunities. Companies can be sure their employees will notice.

Source: (Taylor, 2017<sub>[19]</sub>).

### ***8.3.2. The Anti-Corruption Office could consider developing guidance for independent verification of the quality of companies' business integrity programmes***

Verification can be a useful tool for governments to gain assurance on the existence and quality of a business integrity programme. Based on a set of pre-defined criteria, a verification process reviews the extent to which business integrity programmes meet the required standards. Such processes can either look at the suitability of the programme – that is, the extent to which it is designed to meet the desired outcomes, or the operating effectiveness of the programme over a specified period (Transparency International, 2012<sub>[20]</sub>). Benefits of a verification process include strengthening the programme by identifying areas for improvement, meeting future pre-qualification requirements, and enhancing the reputation of the company as one which is committed to high integrity standards (Transparency International, 2012<sub>[20]</sub>).

Under the Law, certification by the government is not required. This is in line with other regimes that require business integrity programmes, such as Brazil and Mexico, where the government is only required to check that a programme is in place that has the required elements. In preparing the guidance for the private sector, the OA could suggest as a good practice that the companies required by article 24 to implement a business integrity programme provide verification of the business integrity programme by a reputable, independent third-party reviewer. The government of Argentina should avoid conducting any verification themselves, but may wish to set guidelines on the components of an effective verification. Good international practice shows that policy guidance can direct companies to obtain independent third-party assurance. For example, in the UK Adequate Procedures Guidance, the Ministry of Justice suggests that organisations consider obtaining external verification or assurance of their anti-bribery system (UK Ministry of Justice, 2010<sub>[21]</sub>). Similarly, under the Government of Canada's Integrity Regime, in order to be reconsidered eligible for bidding following debarment, companies are required to provide certification by an independent, third party that integrity measures are implemented in their company (Government of Canada, 2017<sub>[22]</sub>).

Good international practice, such as the guidance provided by the UK, also includes a clarifying measure to remind companies that accreditation is not a magic bullet for preventing unethical behaviour (see Box 8.3). In suggesting external verification, the OA could also consider including language in the prepared guidance that clarifies to companies that certification does not eliminate the risk of integrity breaches. This clarification, accompanied with guidance on cultivating a culture of integrity in the private sector, should aim to move companies beyond a 'tick the box' approach to compliance.

### Box 8.3. Policy Guidance on Accreditation in the UK

Section 9 of the UK Bribery Act requires the Secretary of State to publish guidance about procedures that commercial organisations can put in place to prevent persons associated with them from bribing. As such, the Ministry of Justice prepared a Guidance document, which includes 6 principles organisations could consider. Principle 6.4 pertains to independent verification and is as follows:

*In addition, organisations might wish to consider seeking some form of external verification or assurance of the effectiveness of anti-bribery procedures. Some organisations may be able to apply for certified compliance with one of the independently-verified anti-bribery standards maintained by industrial sector associations or multilateral bodies. However, such certification may not necessarily mean that a commercial organisation's bribery prevention procedures are 'adequate' for all purposes where an offence under section 7 of the Bribery Act could be charged.*

Sources: (UK Ministry of Justice, 2010<sup>[21]</sup>).

## 8.4. Carrying out civic education on public integrity in schools

### 8.4.1. The Ministry of Education and the Anti-Corruption Office could incorporate integrity and anti-corruption concepts into the curricula

As Argentina's future, young people are a core audience for shaping the attitudes and behaviours towards integrity for the whole-of-society. Evidence has found that civic education programmes can increase the likelihood of young people rejecting corruption in government, as well as diminish their likelihood of accepting or participating in law-breaking activities (Ainley, Schulz and Friedman, 2011<sup>[23]</sup>; Fraillon, Schulz and Ainley, 2009<sup>[24]</sup>). To this end, incorporating integrity education into school curriculum is a key tool, as it equips young people with the knowledge and skills needed to face the challenges of society, including corruption.

Education about public integrity and anti-corruption can help challenge entrenched social norms that enable corruption to flourish. Such education can be found in the schools (e.g. in the existing curriculum or through extra-curricular activities), or through tools offered independently (such as initiatives by civil society organisations). Education about public integrity and anti-corruption generates new common knowledge about the expected norms and behaviours to prevent corruption. It also cultivates lifelong skills and values for integrity, encouraging young citizens to accept their roles and responsibilities for rejecting corruption.

Using education about public integrity and anti-corruption must however be understood as a long-term policy tool. Like many educational programmes, education about public integrity and anti-corruption builds on the knowledge and skills developed previously. It requires not only a robust curriculum, but also effective teachers who are capable of delivering the material, as well as modelling integrity. Moreover, success will also depend on youth seeing the integrity values upheld in their classrooms, their schools and their communities.

In Argentina, education about civic and ethical values is part of the National Education Law (*Ley de Educación Nacional N° 26.206*). Although the provincial governments are primarily responsible for implementing education, the national Ministry of Education (MoE) in cooperation with the Federal Council of Education (*Consejo Federal de Educación* or CFE) defines common curricular standards and contents for all levels of compulsory education. Following the curricular framework established at the federal level, the provincial governments establish common curricular structures and contents. These structures and contents mirror the priorities of the federal level while also reflecting the social and cultural contexts of each province (Government of Argentina, n.d.<sup>[25]</sup>).

The *Núcleos de Aprendizajes Prioritarios (NAP)* or Priority Learning Centres are the common curricular structure elaborated by the MoE and the CFE. The NAP establishes the common curriculum standards for the core subjects for all initial, primary and secondary schools across Argentina. The NAP for civics and ethics education (*Formación Ética y Ciudadana*) is particularly useful for education about public integrity, as it offers space in the curriculum to reflect on integrity issues. At the primary level, the NAP for civics and ethics education identifies three learning areas: (1) ethical reflection; (2) historical construction of reality; and (3) citizenship, rights and participation. Together, these learning areas aim to build students' knowledge and skills for assessing their personal values and the values of wider society. These learning areas also underscore the role of legal, moral and social norms, and the relationship between norms, forms of authority and respect for the rule of law. Moreover, the learning areas build skills to communicate respectively, and listen and understand different points of view.

Similarly, the NAP at the secondary level (*Ciclo Básico de la Educación Secundaria*) provides opportunities to incorporate education about public integrity. According to the MoE, this NAP contains integrity-related elements, emphasising that the government is not alone in fighting corruption or ensuring integrity, but that unethical practices can exist across several sectors, thereby becoming a shared issue. As such, the NAP requires teachers to promote amongst students critical reflection skills about their political, economic and ethical roles and responsibilities as citizens. For example, one of the learning areas requires students to construct, validate and respect the norms that govern fair coexistence in the school community and society. The NAP also recommends that teachers draw from a variety of teaching disciplines, including education for peace, tax education, cooperative education, in order to strengthen students' understanding of the ethical, legal, political, economic and cultural dimensions of social life.

In addition to the NAP for civics and ethics curriculum, the Anti-Corruption Office in cooperation with the educational community also developed specific anti-corruption educational materials in the late 2000s. The materials, which included a video and accompanying guide for teachers of the series *¿Y vos qué?*, were developed to guide teachers in initiating debates in the classroom and encourage students to reflect on the issue of values. The programme focused on students in secondary school, as well as their families and teachers and contained the following four objectives:

- To create and promote social awareness of respect for the rule of law;
- To strengthen education in values, with the aim of preventing acts of corruption at all levels of social life;
- To disseminate among young people subjects related to public ethics and promote their debate (in the classroom as well as within the family)
- To train teachers to achieve continuity in meeting objectives

The materials were tested in a pilot phase over two years in secondary schools in select schools across Argentina through a series of workshops.

Nevertheless, this programme was not integrated into the core civics and ethics curriculum. Additionally, when offered, it was only to students in upper secondary school who participated. To that end, following a diagnostic evaluation of the programme, a key finding was the need to incorporate the anti-corruption programme into the official curriculum. This was identified as a pending objective. The findings also noted that there are no formal mechanisms to evaluate the knowledge obtained by students in this particular field.

The existing NAP civics and ethics curriculum provides a strong platform for educating on integrity values and norms. To strengthen the link between integrity and corruption prevention, the Ministry of Education could consider building on the structure of the OA's anti-corruption education programme and mainstream it into the primary and secondary Civics and Ethics NAPs. To initiate this work, the MoE and OA could sign an agreement, which clearly lay out the roles and responsibilities for each entity to cooperate on developing and mainstreaming education for public integrity into the main curriculum. As the provincial Ministries of Education are responsible for adapting and implementing the national framework at the provincial level, the agreement should ensure that it assigns concrete responsibilities to the Federal Council for Education.

A key activity of the MoE could be to develop an Action Plan for the creation and implementation of the education for public integrity programme. The Action Plan should clearly identify the concrete tasks, responsible institutions, expected outcomes and timeframe, as well as indicators to evaluate impact. As the anti-corruption and integrity subject matter experts, the OA could play an advisory role to inform on the proposed content. The Action Plan could cover the following core activities: design of the curricular guidelines (e.g. a learning outcomes framework and teaching and learning materials), the teacher training process and the piloting and revision process. The Action Plan could also clearly lay out the process for mainstreaming the learning outcomes framework and the teaching and learning materials into the core curriculum, following the piloting and revision process. The Action Plan could also contain a provision to develop a monitoring and evaluation framework to assess the impact on students' knowledge and skills (see Chapter 2).

As noted above, the curricular guidelines could contain a learning outcomes framework that identifies the core knowledge, skills and attitudes desired for Argentine students about public integrity and anti-corruption (see for example those presented in Table 8.3). The teaching and learning materials should be based on the learning outcomes framework, appropriately tailored to specific age groups and should include activities for students to apply their integrity knowledge in a tangible way. The Federal Council for Education could consider validating the learning outcomes framework and corresponding materials. Moreover, to support the Federal Council for Education in developing and disseminating these materials, the MoE could consider designating funds to education for public integrity within the existing budget for the Civics and Ethics NAP.

In developing the learning outcomes framework, focus should be given to utilising practical activities for students. Experiential evidence has shown that students who engage in practical integrity-related activities not only build the knowledge and skills to hold public officials accountable, but also indicate a stronger willingness to contribute to integrity efforts in their communities (OECD, 2018<sup>[26]</sup>; Integrity Action, 2017<sup>[27]</sup>). Such activities could be both in-class, games, role-play scenarios and debates (see for example

Box 8.4 on Austria) as well as community-based projects. Community-based projects could take on a range of activities, such as real-life encounters with public officials, like the “everyday ethical individuals” mentioned in the previous section (see, for example Box 8.5 on Lithuania). Other activities could include requiring students to prepare and submit an access to information request or identify a specific public project in their community to monitor (see for example (Integrity Action, 2017<sub>[27]</sub>)).

**Table 8.3. Suggested learning outcomes for education about public integrity**

<b>Core Learning Outcome 1: Students can form and defend public integrity value positions and act consistently upon these, regardless of the messaging and attractions of other options.</b>		
Sub-learning outcomes and indicators for achievement	Students can explain their own public integrity values, those of others, and of society, and what they look like when they are applied	<ul style="list-style-type: none"> <li>• Identify and use vocabulary that describes values and the situations in which they apply.</li> <li>• Explain the mechanisms that may lead to a lack of trust in the values of others or their application.</li> <li>• Explain the benefits that arise from having a consistent application of proper processes.</li> <li>• Describe and define the behaviours that are in opposition to public integrity.</li> </ul>
	Students can identify the public integrity values that promote public good over private gain Students can describe the institutions and processes that are designed to protect public good	<ul style="list-style-type: none"> <li>• Cite examples of public good and contrast it with private gain and the values that drive processes that keep these interests separate.</li> <li>• Describe and compare the role of integrity institutions and the need for – and characteristics of – those processes that protect and build integrity.</li> <li>• Clearly separate individuals and their actions and the role and importance of integrity institutions and understand that while individuals may fail in their duties, the underlying rationale for the institutions themselves remains sound.</li> </ul>
	Students can construct and implement processes that comply with their own public integrity value positions and those of society	<ul style="list-style-type: none"> <li>• Create and follow rules /processes.</li> <li>• Encourage others to follow “rule of law” principles.</li> </ul>
	Students can apply intellectual skills in regards to the defence of public integrity values	<ul style="list-style-type: none"> <li>• Devise questions that demand high order thinking, and respond to questions of others.</li> <li>• Critically examine their own behaviour as citizens and explain why others take part in actions that damage public integrity.</li> <li>• Explain the causes of behaviours that are in opposition to public integrity.</li> </ul>
<b>Core Learning Outcome 2: Students can apply their value positions to evaluate for possible corruption and take appropriate action to fight it</b>		
Sub-learning outcomes and indicators for achievement	Students can define corruption and compare it with immoral or illegal behaviour	<ul style="list-style-type: none"> <li>• Form value positions about corruption and express opinions about corrupt acts.</li> <li>• Readily counter the argument that “it is ok to take part in corruption because everyone else does”.</li> <li>• Explain why corruption is worse than simple theft.</li> <li>• Give examples that show why theft of public funds or goods is as bad as theft of private funds or goods.</li> <li>• Identify public values/norms and/or religious views that are against the actions of corrupt leaders.</li> </ul>
	Students can compare and determine the major different mechanisms in corruption	<ul style="list-style-type: none"> <li>• Explain the meaning of bribery and gives examples; compare the role and morality of the bribe giver with the bribe taker.</li> <li>• Define and give examples of nepotism: explain why is it bad for the development of a country or organisation; explain the consequences of nepotism; and explain how selection on merit works and why it is better than nepotism.</li> <li>• Explain the meaning and give examples of conflicts of interest: explain how they can be avoided; design a process that deals with conflicts of interest; and explain the consequences.</li> <li>• Define and give examples of theft or misuse of public goods: explain the consequences of theft of public goods; and compare and contrast grand from petty corruption.</li> </ul>
	Students can describe and evaluate consequences of corruption on a whole country	<ul style="list-style-type: none"> <li>• Explain and give examples of how corrupt acts affect everyone; how inequality of income and opportunity get worse with corruption; and why legal businesses do not like corruption.</li> </ul>
	Students can identify the likely signs of corruption	<ul style="list-style-type: none"> <li>• Identify likely signs of corruption and give examples such as nepotism instead of selection on merit; and lack of accountability and transparency.</li> </ul>

Students can describe ways to, and suggest strategies for, fighting corruption	<ul style="list-style-type: none"> <li>• Explain why it is that if we don't fight corruption we are part of the problem</li> <li>• Define and give examples of transparent processes: explain how transparent procedures stop corruption; evaluate a procedure as transparent; and explain, using examples, why overregulation can cause more corruption.</li> <li>• Define accountability, explain why and give examples of how accountability stops corruption.</li> <li>• Define and give examples of honesty.</li> <li>• Demonstrate transparency, accountability and honesty in their actions.</li> </ul>
Students can identify who and/or to which organisations corruption should be reported	<ul style="list-style-type: none"> <li>• Describe a variety of ways of reporting corruption.</li> <li>• Identify organisations fight corruption (integrity institutions).</li> <li>• Explain the role of the media and civil society organisations in fighting corruption.</li> </ul>
Students can explain the purpose and function of integrity policies	<ul style="list-style-type: none"> <li>• Understand the role of a Freedom of Information law.</li> <li>• Design a Code of Ethics / Conduct, explain how it works compared to laws, and abide by and determine if their actions are compliant.</li> <li>• Understand the concept of whistleblower protection, and explain why whistleblowers need protection.</li> </ul>

Source: (OECD, 2018<sub>[26]</sub>).

#### **Box 8.4. Engaging Austrian students in interactive exercises for integrity and anti-corruption**

The Federal Bureau of Anti-Corruption (BAK) of Austria provides anti-corruption training for students aged 14-18 years in two forms: an Anti-Corruption Event and an Anti-Corruption Workshop.

Developed to reach more students and ensure sustainability of course content, the Anti-Corruption Event uses a series of stations to engage students in different topics of corruption prevention and promotion of integrity. The Event mixes students by class and grade, to enable the development of new group structures and promote students' abilities to work in a team.

Over eight 45 minute units, the Anti-Corruption Workshop, utilises a variety of teaching and learning methods (questionnaires, discussions, role plays, talks with a Corruption Investigator, etc.). The Workshop aims to help students recognise and prevent corrupt situations and feel secure in their future daily professional lives. The programme also aims to develop students' ability to assess the relationship between economic activity and moral values. The content of the course includes the following elements: (i) the definition of the term "corruption" and forms of corruption; (ii) reasons and consequences of corruption and models to explain the corruption phenomena; (iii) corruption prevention and institutions and instruments in the fight against corruption.

One of the interactive activities is the "Corruption Barometer", where two sheets of paper are placed on the floor, one reading "Corruption" and the other reading "No Corruption". The trainer reads out possible corruption cases, and students move between the two sheets of paper according to what level of corruption they believe each case to be. They are then asked to justify their decision, and after the exercise, each case is reflected on and discussed in more detail.

Another activity is the "Role Play" session, where cases of corruption are presented and students are given a "role card" to explain their role. One of the cases, "Acceptance of Gifts", is as follows:



*Claudia is a bad student and might fail in mathematics. Her mother arranges to meet Claudia's teacher at school. During the conversation, the mother gives the school teacher a precious pen. The director and a teacher of philosophy are present.*

Students then discuss a series of questions in groups, including:

1. How would you evaluate the behaviour of each person?
2. In your opinion, can this already be considered as corruption?
3. How should these people behave properly?

At the end of the course, students receive a hand-out entitled "Information on Corruption", which includes a test and overview of the material covered, and also complete a feedback form, which is used to improve the training.

Sources: (Federal Bureau of Anti-Corruption, 2013<sup>[28]</sup>; Federal Bureau of Anti-Corruption, n.d.<sup>[29]</sup>).

### **Box 8.5. Changing attitudes towards corruption through education in Lithuania**

In Lithuania, the anti-corruption body (the Special Investigation Service or STT), the Modern Didactics Centre (MDC), [a non-governmental centre of excellence for curriculum and teaching methods], and a select group of teachers, worked together to integrate anti-corruption concepts into core subjects like history, civics and ethics. Beginning in 2002, the group designed a training course for teachers on anti-corruption to familiarise them with the anti-corruption laws and legislation, definitions and concepts. Following this, the group mapped the national curriculum to identify areas where concepts about values (fairness, honesty, and impact on community) and anti-corruption could be integrated naturally. Once the initial curriculum was developed, the teachers tested the curriculum in their classrooms over a 6 month pilot period and refined the lessons based on the responses of the students. The end result was curriculum that allowed students to learn why corrupt activities were wrong and how ethical behaviour could be applied in their personal lives to address these dilemmas.

Following the pilot period, the MDC and consultants from the Education Development Centre, an agency within the Ministry of Education, compiled a series of sample lessons from the pilot period into a handbook for other teachers to use in the classroom. The lessons could be adapted by teachers to fit the context in their classroom, but were also complete enough to be used in their entirety. The lessons were also cognisant of the various learning abilities of different age groups, with lessons for the younger students focusing on values such as fairness and honesty, and lessons for the older students focusing on more complex issues, such as an historical analysis of the long-term impacts of corruption.

Over the years, the programme has expanded from classroom-based learning to engaging students with local anti-corruption NGOs and municipal governments to apply their knowledge in a tangible way. For example, in one city, students were introduced by the local civil servant responsible for anti-corruption to areas at risk for corruption within the local administration and the municipality's plans to address the risks. The students were then involved in inspecting employee logs, just as a government official would, to check for irregularities and potential areas of abuse of public resources, such as government vehicles and fuel cards.

Source: (Gainer, 2015<sup>[30]</sup>).

#### ***8.4.2. The National Teacher Trainer Institute could incorporate training on public integrity into the Jurisdictional Curriculum Designs***

The successful implementation of education about public integrity is dependent upon teachers who can effectively deliver the curriculum in the classroom. Teacher training on anti-corruption and integrity concepts, as well as on how to address difficult social topics in the classroom, is therefore a crucial component to the curriculum efforts. Teacher training can equip trainee and experienced professionals with the skills, knowledge and confidence to counter contemporary social problems, such as corruption (Starkey, 2013<sup>[31]</sup>). Training on integrity and anti-corruption can also introduce normative standards to teachers, such as the norm that they have moral obligations to challenge corruption and help their students navigate the difficult ethical dilemmas they encounter. Teacher training can take many forms, ranging from courses taken during teacher trainee programmes and professional training, to seminars and resource kits prepared by government institutions and/or civil society actors.

In Argentina, initial and continuing teacher training is enshrined in the National Law on Education and coordinated through the National Institute of Teacher Education (*Instituto Nacional de Formación Docente* or *INFD*). Within each province, the Jurisdictional Curriculum Designs (*los Diseños Curriculares*) for teacher training include a subject aimed at ethics and citizenship training, which address concepts such as conflict in society, norms and the role of the state. Currently, concepts related to public integrity and corruption prevention are not included. The INFD could develop guidelines for the provinces on including content related integrity and anti-corruption in the ethics and citizenship component of the respective Jurisdictional Curriculum Designs. The guidelines could suggest developing modules on concepts of corruption and integrity, as well as strategies for cultivating an open classroom environment and managing difficult conversations (see Box 8.6 and Box 8.7).

**Box 8.6. Preparing teachers to teach anti-corruption in Lithuania**

As part of anti-corruption curriculum development in Lithuania, two project objectives were identified to support teachers in integrating anti-corruption content into their lesson plans: 1) to prepare an in-service training programme of anti-corruption education; and 2) to prepare a team of trainers able to consult and train other teachers.

In February 2004, the project team prepared a training course for teachers, as well as an in service training programme. From March to August 2004, a series of workshops and training seminars were held for teachers, with the following themes addressed:

- Critical thinking methodology for anti-corruption education
- Foundations of adult education
- Principles of strategic planning
- Development of in-service training programme for anti-corruption education

Between September and December 2004, the in-service training programme was prepared and piloted in the regions, with the results of the pilot informing various updates to the programme. The resulting programme, Anti-corruption Education Opportunities for Secondary School, is part of the permanent training offered by the Modern Didactics Centre, a centre of excellence for curriculum and teaching methods. The programme aims to provide teachers with information about corruption and anti-corruption education, and to encourage them to apply elements of anti-corruption education into their lesson planning and extra-curricular activities.

*Source:* (Modern Didactics Centre, 2004<sub>[32]</sub>).

### Box 8.7. Creating an open classroom and school environment

An open classroom and school environment are core components of an effective education about public integrity and anti-corruption programme. An open environment has been found to encourage learning, with students sharing their personal experiences and learning from one another. Additionally, an open environment can model the expected behaviours and norms of a democratic society, which can have a positive influence on assimilating these values and future civic behaviour (Ainley, Schulz and Friedman, 2009<sup>[33]</sup>).

Experience from successful educational interventions highlights the role of an open school and classroom environment and identifies four core interrelated components for the planning and delivery of effective learning:

1. Facilitating an open classroom discourse and a dialogic pedagogy to enable students to open up about their values and insights.
2. Valuing and respecting students and their experiences, allowing them to leverage their contextual knowledge and experiences to inspire their citizenship action and engagement.
3. Ensuring a whole-of-school approach, where the school environment accords genuine rights and responsibilities to all its members, modelling democratic and respectful behaviours in all its actions. This component also advocates for a student voice that is not just listened to, but trusted and honoured.
4. Creating and sustaining a structure that supports teachers and other staff to engage in these processes and support the whole-of-school transformation, is also a critical element of an open school and classroom environment. (Deakin Crick, Taylor and Ritchie, 2004<sup>[34]</sup>)

Evidence has also found that students who learn in an open classroom environment develop qualities of empathy, critical thinking, the ability to understand the beliefs, interests and vies of others, as well as the ability to reason about controversial issues and choose different alternatives (Van Driel, Darmody and Kerzil, 2016<sup>[35]</sup>).

*Sources:* (Van Driel, Darmody and Kerzil, 2016<sup>[35]</sup>; Deakin Crick, Taylor and Ritchie, 2004<sup>[34]</sup>; Ainley, Schulz and Friedman, 2009<sup>[33]</sup>).

#### ***8.4.3. The Ministry of Education and the Anti-Corruption Office could partner with universities to mainstream integrity and anti-corruption throughout their degree programmes.***

As future employees, post-secondary students need the knowledge and skills to comply with ethical requirements, as well as be able to confront integrity challenges as they arise. Evidence has found that integrating ethics education into university curricula can increase students exposure to a range of ethical issues and improve their ethical sensitivity, a critical component of the ethical decision-making process (Martinov-Bennie and Mladenovic, 2015<sup>[36]</sup>). Other evidence has shown that even short ethics programmes, consisting of three discussions, supported the development of ethical sensitivity amongst students (Clarkeburn, Downie and Matthew, 2002<sup>[37]</sup>). Such interventions can however be transitory, either due to the curriculum content or environmental influences. To counteract the transitory effect of ethics education, it is suggested that post-secondary

course work be supplemented by experiential learning and immersion techniques to give students the opportunity to experience and practice ethical considerations (Bampton and Maclagan, 2005<sup>[38]</sup>; Christensen et al., 2007<sup>[39]</sup>).

Moreover, to be effective, training on integrity should not be limited to certain professions. While certain sectors are at a higher risk of corruption and fraud, integrity breaches can be found across all sectors. Furthermore, as employees are more likely to change careers multiple times, post-secondary students would be better served by integrity education which is mainstreamed across their curricular.

Together with the OA, the MoES could partner with universities to develop modules on integrity and anti-corruption and mainstream into existing courses, such as law, economics, business, engineering and architecture, and public administration. One possible way to achieve this could be through a MoU between the MoES, the OA and interested universities. The Anti-Corruption Academic Initiative (ACAD) contains extensive resource material which universities can draw upon to design their own modules (see Box 8.8). The OA could also encourage universities to sign up to the Poznan Declaration, which provides clear recommendations to universities for mainstreaming integrity and anti-corruption throughout their courses (see Box 8.9).

#### **Box 8.8. UNODC Anti-Corruption Academic Initiative (ACAD)**

The ACAD initiative aims to facilitate exchange of curricula and best practices between university educators. ACAD is a collaborative academic project that aims to provide anti-corruption academic support mechanisms such as academic publications, case studies and reference materials that can be used by universities and other academic institutions in their existing academic programmes. In this manner, ACAD hopes to encourage the teaching of anti-corruption issues as part of courses across various disciplines such as law, business, criminology and political science and to mitigate the present lack of inter-disciplinary anti-corruption educational materials suitable for use at both undergraduate and graduate levels. ACAD has developed a full model course on anti-corruption, a thematically organized menu of resources and a variety of teaching tools; all availed freely on the web (UNODC, n.d.<sup>[40]</sup>).

Academics often argue that curricula are already too congested and adding topics adds to the burden; however, the initiative emphasizes that there opportunities for synergies and complementarities where ethics and anti-corruption can be emphasized without unnecessarily expanding the burden for both students and university teachers. The rationale for mainstreaming ethics and integrity in all university courses is that there is an under-supply of professionals and graduates who are capable of solving ethical dilemmas and who are equipped with critical thinking skills.

*Sources:* (UNODC, n.d.<sup>[40]</sup>), OECD/U4 (forthcoming) *Promoting a culture of integrity through education*.

### Box 8.9. The Poznan Declaration

The mainstreaming of ethics and anti-corruption in higher education is being promoted globally by the Compostela Group of Universities, the World University Consortium and the World Academy of Art and Science, a global network of 700+ university professors. The mainstreaming instrument is the Poznan Declaration, which brings together higher education with governments, business and civil society in the fight against corruption.

The declaration, titled the “Whole of University Promotion of Social Capital, Health and Development,” was signed in September 2014. The declaration is based on the recognition that the educational system has been producing individuals geared towards narrow self-interests, and therefore higher education needs to adopt a more holistic approach that emphasises ethics and integrity not only for law and public policy students, but for all university courses, in order to start a trust-promoting causal chain that can improve the quality of government and hence the standard of living and wellbeing of citizens (Tannenber and Rothstein, 2014). The declaration therefore calls for:

- Adoption of a cross-faculty approach to include ethics and anti-corruption education in all university curricula.
- Encouraging lecturers and professors to facilitate the incorporation of ethics issues in their classes.
- Re-emphasising ethics as the cornerstone of professional identities which set the boundaries of future acceptable behaviour.
- Universities should ensure transparency, accountability and impartiality in teaching, student assessment and research; as well as in the recruitment of students, award of degrees, employment, promotions and other areas of university life.

Towards the inclusion of ethics and anti-corruption components on existing curricula, the declaration suggests the following:

- Bringing corruption to the classroom by drawing attention to the growing body of research that shows the correlation between corruption and other aspects of life such as health, development, social trust and quality of government.
- Raising awareness of existing domestic anti-corruption law as well as on regional and international initiatives against corruption
- Organising discussion seminars on values and norms that should govern human social interactions.
- Using case studies from real professional practice to which students can relate as a teaching tool
- Making use of e-learning programmes, video-conferences and apps that can provide ethical dilemma training through simulation that encourages the student to make a decision or take appropriate action.

*Sources:* (Tannenber and Rothstein, 2014<sup>[41]</sup>); OECD/U4 (forthcoming) *Promoting a culture of integrity through education*.

## Proposals for action

### *Raising awareness in society of the benefits of integrity and reducing tolerance of violations of public integrity*

- The Anti-Corruption Office could take an active role in communicating to citizens and firms their roles and responsibilities for respecting public integrity through awareness-raising campaigns.
- A whole-of-society communications unit could be institutionalised under the Subsecretariat of Integrity and Transparency, and assigned responsibilities for conducting awareness raising programmes.
- The Anti-Corruption Office could develop a whole-of-society communications strategy that identifies the target audiences, key messages, communication channels and expected outputs. The awareness raising campaigns should be tailored to the target audiences, generate community responsibility and increase a sense of agency, and encourage action.
- The Anti-Corruption Office could develop an awareness campaign that communicates success stories from effective behaviour changes throughout the government. The campaign could highlight “everyday ethical public officials” who have helped change the way their team works for integrity in the Argentine government. The officials pledge to honour these values as a matter of respect towards the public they are serving and ask the citizens to return this respect by trusting them to serve in the public interest.
- Through Memorandum of Understanding, the Anti-Corruption Office could assign the responsibility to other government entities that deal with high-risk areas, including, but not limited to, the Ministry of Labour, Employment and Security (*Ministerio de Trabajo, Empleo y Seguridad*), the Ministry of Health (*Ministerio de Salud*) and the Ministry of Social Development (*Ministerio de Desarrollo Social*), , to incorporate integrity and anti-corruption awareness raising campaigns for citizens in their respective areas.
- The awareness raising and identity forming measures could be supported by behavioural interventions creating salience for moral norms and identities.

### *Engaging with the private sector to uphold integrity in business activities*

- The guidance prepared by the Anti-Corruption Office could emphasise how to go beyond cosmetic compliance programmes.
- The Anti-Corruption Office could consider developing guidance for independent verification of the quality of companies’ business integrity programmes.

### *Carrying out civic education on public integrity in schools*

- The Ministry of Education and the Anti-Corruption Office could scale up the existing anti-corruption education programme for secondary students and implement it into the existing primary and secondary subject for Citizenship and Ethics Education (Formación Ética y Ciudadana). To achieve this, the Ministry of Education could sign an agreement with the Anti-Corruption Office that clearly lays out the roles and responsibilities of the Ministry of Education and the Anti-Corruption Office to cooperate on developing and mainstreaming education about public integrity into the main curriculum. The agreement should also ensure that it assigns responsibilities for implementation to Federal Council for Education.

- The Ministry of Education could develop an Action Plan for the creation and implementation of the education for public integrity materials. The Action Plan should clearly identify the concrete tasks, responsible institutions, expected outcomes and timeframe, as well as indicators to evaluate impact.
- The Action Plan could include the design of the learning outcomes framework, the design of the teaching and learning materials, the teacher training process and the piloting, integration and revision process. The Action Plan could also contain a provision to develop a monitoring and evaluation framework to assess the impact on students' knowledge and skills.
- The learning outcomes framework should identify the core knowledge, skills and attitudes desired for Argentine students about public integrity and anti-corruption. The teaching and learning materials should be based on the learning outcomes framework, appropriately tailored to specific age groups and should include activities for students to apply their integrity knowledge in an applicable way.
- The National Institute of Teacher Education (INFD) could develop guidelines on including content related to integrity and anti-corruption in the ethics and citizenship component of the respective Jurisdictional Curriculum Designs. The guidelines could suggest developing modules on concepts of corruption and integrity, as well as strategies for cultivating an open classroom environment and managing difficult conversations.
- The Ministry of Education and the Anti-Corruption Office could partner with universities through a Memorandum of Understanding to mainstream integrity and anti-corruption throughout their degree programmes.
- The Ministry of Education and the Anti-Corruption Office could encourage universities to sign up to the Poznan declaration and utilise the teaching resources made freely available by the UNODC Anti-Corruption Academic Initiative (ACAD) to mainstream education about integrity and anti-corruption in all areas of the university curriculum.



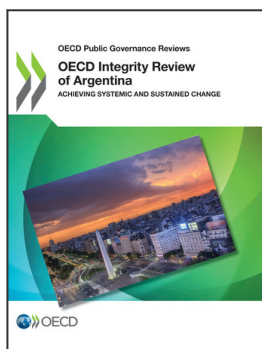
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**From:**  
**OECD Integrity Review of Argentina**  
Achieving Systemic and Sustained Change

**Access the complete publication at:**

<https://doi.org/10.1787/g2g98ec3-en>

**Please cite this chapter as:**

OECD (2019), "Cultivating a culture of integrity across society in Argentina", in *OECD Integrity Review of Argentina: Achieving Systemic and Sustained Change*, OECD Publishing, Paris.

DOI: <https://doi.org/10.1787/66471ff6-en>

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