3 Lessons to strengthen corruption risk management in the Slovak Republic

One of the central measures set out in the Anti-Corruption Policy of the Slovak Republic for the years 2019-2023 is to strengthen the identification and mitigation of corruption risks across the Slovak public sector. The experimental findings demonstrate the potential of applying behavioural insights to enhance already-existing corruption risk management policies. Both the intervention appealing to leadership, and the one supporting a better understanding of risks, when coupled with social norms messaging, significantly improved the likelihood of communicating integrity risks. This chapter outlines the recommendations that emerged from the analysis and experimental findings.

3.1. Last step of BASIC: Scaling up the successful results

To better understand systematic errors and biases in decision-making in the context of risk communication, and to improve procedures and practices, insights from behavioural sciences were applied to improve the current risk management system in the public administration of the Slovak Republic. In line with Government resolution No. 585 on the Anti-Corruption Policy for the years 2019-2023, ministries and other central authorities in the Slovak Republic are required to conduct their own risk assessments for sectoral anti-corruption programmes. The OECD Public Integrity Review of the Slovak Republic (2022) recommends making use of a wide range of resources when analysing corruption risks. The first line of defense - i.e., employees and managers - are in a crucial position to detect risks, and their input for risk assessment is valuable. In line with these recommendations, a central aspect of this study was to encourage civil servants to communicate more about potential integrity risks.

This study demonstrated the promise behavioural science holds for improving public sector integrity and specifically for increasing risk communication in the Slovak public administration. Both behaviourally informed treatments significantly improved the likelihood of communicating a corruption risk among employees, indicating that using behavioural insights can indeed help to encourage the communication of risks among public servants, as was hypothesised at the start of the study.

Of the two treatments, the one exposing employees to exemplary leadership treatment was the most impactful in improving risk communication. The results also showed that employees in hiring roles feel safer and are more likely to report integrity risks related to hiring. This is encouraging, since people who oversee hiring are more likely to report hiring risks, and they are most likely also to be involved in assessing and managing these risks in reality.

Moreover, results showed that people feel more or less safe in communicating risks depending on who they report to. This underscores the critical need for optimising the design of risk communication systems to harmonise with employees' preferences and foster a sense of comfort and confidence in communicating risks.

Based on the experimental results, this chapter presents a set of key recommendations with concrete actions on how the Corruption Prevention Department can improve risk communication in the Slovak public administration. The high-level recommendations and concrete policy actions are presented below and summarised in Table 3.1. As the Slovak Republic develops its new Anti-Corruption Strategy for the period 2024-2029, these recommendations can serve as guidance to help inform future integrity policies in the public administration.

Table 3.1. Key findings and recommendations

Key findings	Policy recommendations	Potential policy actions
Make risk communication feel safe and encouraged		
• **Less than 50% of respondents felt safe** when communicating corruption risks. • Often, officials do not communicate risks even if they are aware of one. • A culture of fear and silence prevents officials from speaking up and communicating risks. • The experiment found that when employees feel safer to speak up, they are significantly more likely to communicate risks. • Behaviourally informed interventions were successful in increasing feelings of safety as well as risk communications.	**Cultivate a safer environment for employees to communicate risks and feel heard** • Foster a culture a safety where employees feel safe raising issues and communicating risks • Allow employees to raise risks through the channels that they feel safest using	• **Consult employees** on potential structural changes to the risk management system that would make them feel safer. • Ensure that corporate policies stress that employees are free to **communicate risks to the actors they feel safest communicating risks to**, including their managers. • **Help employees feel heard**, e.g., through regular check-ins and follow-ups to reassure that concerns on potential risks are taken seriously and acted upon. • **Promote a social norm of communicating risks**, for example by acknowledging and reporting those who communicate on

Key findings	Policy recommendations	Potential policy actions
• Respondents felt safest when communicating risks to specific stakeholders.		potential risks

• The experimental findings suggest that senior officials, specifically, are less likely to communicate risks.
    ○ This is potentially due to status quo bias in which a preference for the current state of affairs prevents new changes from taking place.
    ○ Literature suggests this could also be linked to higher retaliation risk for seniors, from which greater organizational loyalty is expected.
	Conduct further research to understand the differences in perceptions and behaviours between younger and senior employees
	• Tailoring policies to different age segments could be effective in improving risk communication
		• Ministries and other central authorities and Anti-corruption Coordinators should clarify to employees that **communicating risks will not result in retaliation**.
		• Organising targeted focus groups could help **understand the different perceptions** on risk communication between the young and senior civil servants and how to address these.

Empower leaders to set the standard through their actions		
• A **lack of exemplary leadership**: public managers do not encourage or prompt employees to communicate risks and exhibit ticking-the-box and big-fish behaviours. • Experimental results showed that when public employees are exposed to examples of good leadership, they display a higher likelihood of communicating a corruption risk.	• Encourage good leadership and make it salient • Encourage officials in leadership positions to adopt better integrity behaviours to increase safety and risk communication • Actively emphasise and elevate good behaviors from leaders • Equip leaders with the right skills and knowledge to support an open culture and ethical code of conduct	• **Provide integrity trainings to civil servants in leadership** roles to equip them with relevant competences, skills and knowledge on how to create culture of safety and open communication in teams, and how to effectively communicate risks, and communicate about risk detection, mitigation and management in their teams. • **Support leaders** in aligning communication and people management with the objective of enhancing ethical conduct and open culture. • **Acknowledge and emphasise positive leadership models,** for example through new recognitions for good ethical behaviours.
• The lack of understanding of the importance of communicating prevents employees from communicating risks. • Diagnostic analysis showed that it is not always clear to public employees that **they should report potential corruption risks,** and not only actual corruption incidences. • ACCs have a key potential as leaders supporting corruption risk management.	**Empower Anti-corruption Coordinators and cross-agency working groups to act as risk management leaders and review risk management practices on a regular basis** • Empower ACCs to enhance public officials' ability to identify and mitigate risks effectively. • Consider making corruption risk management a standard feature of meetings of the Council of ACC and establishing cross-agency working groups to share best practices and support the implementation of risk management practices across the public sector. • **Review risk management practices on a regular basis** to strengthen the harmonisation of corruption risk management as part of internal control policies.	• **Ensure ACCs receive targeted training and resources** to lead and support risk assessment and management in respective agencies. • Strengthen the ACCs' role to support and lead the strengthening of risk management practices in entities. • **Integrate dedicated agenda items on corruption risk management during Council of ACC meetings** to foster regular discussions and updates on the subject. Facilitate regular meetings of cross-agency working groups bringing together representatives from various ministries and other central authorities. To discuss challenges, share best practices, and collaborate on the implementation of effective risk management practices. • **Integrate corruption risk management aspects into annual government-wide reviews on the internal control and internal audit systems**, to assess the maturity and reliability of risk management practices.
Ensure the process is easy and well-understood		
• There is a **lack of understanding about what constitutes an integrity risk** and a lack of understanding of the importance of communicating integrity risks. • Currently, employees do not communicate integrity risks due to the	**Raise awareness of integrity policies: ensure employees know what they should do and how they should do it** • Make the understanding of integrity risks a priority across the public sector • Communicate the norm for	• **Create concise and illustrative guidelines for public servants** guiding the employees through a situation involving a corruption risk and clarifying that there is an expectation to communicate risks • **Design a web-based whole-of-government campaign** where the concise guidelines take

Key findings	Policy recommendations	Potential policy actions
lack of clear channels to do so. • Communicating to employees the expectation that **every civil servant should speak up about corruption risks** (injunctive social norms) was a crucial element of the two successful behaviourally informed interventions that encouraged risk communication.	everyone to follow integrity policies • Leverage social norms for enhancing favourable norms and for more effective risk communication	the form of visual how-to illustrations on the various reporting channels • Truthfully apply social norms in communication to **raise awareness and improve compliance**, emphasising the importance for everyone to engage in risk communication

3.2. Make risk communication feel safe and encouraged

3.2.1. Cultivate a safer environment for employees to communicate risks and feel heard

Many of the barriers in the diagnostic analysis were related to not feeling safe when communicating risks, and the experimental findings confirmed that less than 50% of the respondents felt safe while doing so. The findings from the diagnostic analysis demonstrated that public officials were not communicating risks also due to the lack of safe channels for risk communication, which again should not be confused with whistleblowing channels, serving another purpose. The findings also revealed that respondents tended not to communicate a risk even if they were aware of one. In the experiment, even in a hypothetical, simulated example where there clearly is a risk, only 30.8% of the respondents identified the situation as a risk, and less than 50% were likely to communicate about a risk in control group. These results emphasise the need and potential to improve feelings of safety to support integrity objectives.

On the other hand, the experiment showed that when employees feel safe, they are significantly more likely to communicate risks. In addition, both behaviourally informed interventions helped participants in feeling safer in communicating risks. Even if the effects of the two interventions on psychological safety were small, these results make sense as the primary objective of the interventions was not to improve general safety, yet they were successful in increasing general safety as a side effect. Behaviourally informed communications targeted specifically at increasing psychological safety could be designed with this aim in mind, which may prove even more impactful and could be a good follow-up to this first study.

Fostering a culture of openness and safety, in which employees feel comfortable communicating risks, is therefore essential for effective risk communication. Respondents also felt safer after they knew to whom they would report a risk, and how they can communicate risks. As such, **it will be important for the Slovak Republic to take measures to ensure that employees feel safe to communicate risks.** For example, communications around risk management policies could stress that employees are free to communicate risks to whoever they can feel safest communicating risks, including their managers, which in the experiment were found to be one of the go-to actors for risk communications. Alternatively, a suggestion box could be created to seek inputs from employees on what structural changes to the risk management system would increase their own willingness to communicate risks.

In addition, **it will be important to make employees feel heard when they communicate about risks.** In fact, a key finding in the diagnostic analysis was a lack of trust in believing that the system works, and that action will be taken after an employee speaks up about a potential risk. Regular check-ins and follow-ups could help in this sense. This could mean promoting a system for regular follow-ups after potential risks are raised. This reassures employees that their concerns are taken seriously and investigated appropriately. It could also be useful to celebrate employees who communicate on potential risks: acknowledging and rewarding those who report concerns can encourage others to come forward. This is also in line with evidence on social norms: people are more likely to communicate on risks if they think others are doing so as well, or if there is a shared understanding that speaking up is the right thing to do.

3.2.2. Conduct further research to understand the differences in perceptions and behaviours between younger and senior employees

Another finding in the diagnostic analysis was a culture of fear and silence. Respondents reported being fearful of retaliation for speaking up about risks; especially senior officials were less likely to communicate risks, compared to younger officials. The experimental results confirmed that senior officials were more reserved to speak up about corruption risks and senior respondents also felt less safe than younger respondents when communicating risks, which could reflect a status quo bias among senior officials, in which a preference for the current state of affairs prevents new changes from taking place.

Previous literature suggests that older employees are more likely to be retaliated for speaking up compared to younger employees. For senior employees at higher management levels potentially a greater organisational loyalty is expected (Mesmer-Magnus, J.R. and Viswesvaran, C., 2005[1]) and when a senior employee speaks up, this may create a higher sense of betrayal, which may result in stronger retaliatory behaviours. Ministries and other central authorities and Anti-corruption Coordinators should thus make it clear to employees that speaking up about risks and other wrongdoings will not result in retaliation against the whistle-blower.

Experimental findings from an OECD experiment fostering safety in the energy sector found that frontline workers tend to have a different perception on safety, compared to management, as frontline workers are more often involved in unsafe activities (OECD, 2020[2]). Similarly, in the context of risk reporting different age segments may have different risk perceptions. Policies tailored to the specific needs of different population segments could more effectively increase risk reporting and general safety. **Yet further research is needed on the perception on risk between the young and senior civil servants to understand what creates the age difference in risk communication behaviours.** This could, for example, take the form of targeted focus groups.

3.3. Empower leaders to set the standard through their actions

3.3.1. Encourage good leadership and make it salient

The diagnostic analysis revealed low levels of exemplary leadership in the Slovak public administration. Some managers exhibited "ticking the box"- behaviours meaning that they claimed to follow rules and codes of conduct when in reality they failed to translate these rules into practice. The lack of exemplary leaders had left officials uncertain on how to act upon a risk in an atmosphere where they feel fearful for retaliation, or for being bullied or ridiculed for their concerns. Employees expressed that they do not communicate risks because the managers were not believed to act upon the risks reported.

The experimental findings indeed show that when public servants are exposed to good ethical behaviours from their leadership this can have a significant and positive effect on the likelihood of communicating risks. In fact, appealing to exemplary leadership was the most impactful of the two treatments in significantly improving the likelihood of communicating a corruption risk. Exemplary leadership was also found to increase employees' feelings of safety when communicating. Even if the experiment was conducted in a hypothetical setting online, the results were indicative of exemplary leadership being key in supporting ethical conduct in public organisations.

Encouraging good leadership and making it more salient can therefore help civil servants in the Slovak public administration to promote risk communication across teams. As in the case of Brazil (see Box 1.2), encouraging leaders to lead by example and to facilitate communicating risks could involve the provision of training to equip leaders with the right skills and competences. Training on integrity leadership would ensure that officials in leader roles know how to effectively communicate risks, and how to effectively communicate about risk detection, mitigation and management in their teams.

In addition to promoting improved leadership practices, **it will also be crucial to make good leadership more salient to highlight and reinforce this behaviour**, for instance through recognition and rewards, thereby amplifying exemplary instances of effective leadership. New incentives, and even gamification elements, could be introduced to ensure acknowledging and incentivising positive leadership models.

Exemplary leadership was also significantly correlated with general feelings of safety and highlights the responsibility leaders have in creating a safe space and open culture in their teams. Leaders have a crucial role in encouraging their team members and creating a safe space where employees feel comfortable communicating risks. The experimental results also showed that knowledge on the reporting channels, and trust in the risk management system – i.e., the belief that it functions appropriately, are positively associated with general safety. **Risk communication and people management should therefore be aligned with and support the objective of enhancing ethical conduct and open culture.**

3.3.2. Empower Anti-corruption Coordinators and cross-agency working groups to act as leaders for effective risk management and review risk management practices on a regular basis

Diagnostic analysis revealed that officials have difficulties distinguishing between a corruption risk and a materialised corruption case, and the experimental results confirmed this finding. The experimental findings found that it is not always clear to public employees that they can and are encouraged to communicate corruption risks, and not only actual corruption incidences. Less than one-third (30.8%) of the respondents across the whole sample correctly indicated that the situation in the vignette is a risk. On the other hand, understanding the importance of communicating risks was highly significantly associated with the likelihood of communicating risks and with feeling safe when communicating risks.

The "Understanding of a risk" treatment aimed to improve the understanding of a risk among the respondents and, by doing so, to increase risk communications. The effect of the treatment on risk communications was significant and positive. Given the high correlation between understanding of the importance of communicating risks and likelihood of communicating risks, improving the understanding of risks is key in going forward.

The current agency-specific risk management practices for identifying and communicating integrity risks in the Slovak Republic could be enhanced across the public administration. The insignificant correlation between agencies and the likelihood of communicating risks indicated that the risk communication culture across ministries and other central authorities is similar, and currently employees are not participating enough in this exercise.

The Corruption Prevention Department in the Office of the Government of the Slovak Republic has a central role in leading, overseeing and providing guidelines for the identification and mitigation of corruption risks across ministries and other central authorities in the Anti-Corruption Policy. In addition to raising awareness of integrity policies to improve the understanding of risk, the CPD could consider strengthening the ACCs role and capacities to lead and support corruption risk management in their respective agencies by giving them appropriate training and resources for such activities. The ACCs could then reach out to those in leader and manager positions, who are responsible for risk assessment and management (OECD, 2023[3]). This could allow to effectively tailor risk management practices to each agency's unique context and to contribute to professionalise risk management throughout the administration. The ACC could be given appropriate training and resources to lead and support risk management in their respective agencies.

The CPD could also consider making corruption risk management a standard feature of the meetings of the Council of the ACC and establishing cross-agency working groups bringing together representatives for risk assessment activities from different agencies to promote and support risk assessments. While each agency has its specific sectoral risks, some risks are also cross-sectoral. This could facilitate horizontal knowledge sharing and help harmonising risk management practices across the public administration

(OECD, 2022[4]), but it could also help in identifying new potential risk areas and provide feedback and support on risk management practices (OECD, forthcoming[5]). This can be particularly beneficial for the less advanced agencies, as knowledge sharing could facilitate and encourage these agencies to adapt practices that have worked elsewhere.

The CPD could also consider collaborating with the central harmonisation function in the Ministry of Finance to strengthen the harmonisation of corruption risk management as part of internal control policies. Toward this end, corruption risk management aspects could be integrated into the annual government-wide reviews on the internal control and internal audit systems produced by the Ministry of Finance, to assess the maturity and reliability of risk management practices across ministries and other central authorities and identify areas for improvement.

3.4. Ensure the process is easy and well-understood

3.4.1. Raise awareness of integrity policies: ensure employees know what they should do and how they should do it

In addition, the diagnostic analysis showed that employees do not always know how to communicate risks, as the system for communicating risks is not always clear. Conversely, a key tenet of behavioural science is making the desired behaviours (risk communication, in this case) easy, aiming to streamline processes and experiences. Meanwhile, the experiment also showed that the higher employees' trust is in the risk management system, the higher is their likelihood of communicating a risk. This finding is intuitive, as the more appropriate and well-functioning a corruption risk management system is, the more likely individuals are to trust that the system functions and are more willing to communicate risks. The higher the respondents' trust in the risk management system was, the safer respondents also felt in communicating risks. Having knowledge on the reporting channels was also significantly associated with the likelihood of communicating a risk: intuitively, when employees know how to communicate risks, they are more likely to communicate risks and felt safer communicating risks.

To support the efforts that the CPD has already made in disseminating risk management guidelines to all ministries and other central authorities, **concise guidelines aimed for public servants could also be created with illustrative and relatable examples on risk detection and assessment, the purpose and function of the various risk communication channels, and what happens after a risk has been reported**. More specifically, guidelines could guide the employees stepwise through a process in a situation where there is a risk providing a good overview on how to act and proceed in such situation. These guidelines should promote the understanding of risks, the importance of risks, and clarify that risk assessment and management is part of the responsibilities of public managers, yet each civil servant is expected to contribute to it by communicating risks. They should clarify that there is an expectation for public officials to communicate potential corruption risks, and not only actual corruption incidences, and that there exists an injunctive social norm such that every civil servant should speak up about corruption risks.

Equally, one aspect of an effective communication strategy could be a web-based whole-of-government campaign where the concise guidelines take the form of visual how-to illustrations on the various reporting channels. The campaign could also include a timeline to illustrate how the complaints will be processed, and when whistle-blowers can expect a follow-up on their risk reported. A campaign could raise awareness and buy-in across ministries and other central authorities to institutionalise corruption management and support them in their risk management efforts (OECD, 2022[4]). These efforts could be further informed by behavioural insights for effective communications.

One of the elements in the interventions were social norms, which have been effective in shaping behaviours in other contexts (Cialdini, Kallgren and Reno, 1990[6]; Goldstein, Cialdini and Griskevicius, 2008[7]). Leveraging injunctive or descriptive social norms could enhance the favourable ethical norms in

an organisation. Indeed, in the experiment, communicating to employees the expectation that every civil servant can communicate corruption risks (injunctive social norms) was a crucial element of the two successful behaviourally informed interventions that encouraged risk communication. This is in line with previous research from the context of anti-corruption suggesting that using social information can support the idea that a positive change for the better is possible (Stahl, C, 2022[8]). Normative messaging may also be effective, if it is tailored to the context accordingly. As such, social norms could be harnessed to raise awareness of and compliance with integrity policies. Any references to social norms must be truthful to build trust, and to avoid any backfiring effects.

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