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ETHICAL CODES FOR THE PUBLIC ADMINISTRATION

A Comparative Survey

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ABSTRACT

This report is an analysis of a number of ethical codes for the national public administration. We present four theoretically grounded reasons for why such codes have been established and in many countries are seen as necessary. These are the limits of laws, the role of expertise in politics, the limits of steering by economic incentives and the problem of “self-interest” in public office. Our analysis departs from earlier studies in that we have included a number of non-western countries. One reason for this is to see if there exists a universal understanding of which values the civil service should uphold or if there are differences between countries from different regions in the world. Our ambition is not to study the effectiveness of these codes or prescribe values that should be included. Instead, our goal is to highlight which values are important across all codes, while also diving in to the deeper conversation about how these codes differ and reasons why this might be. The result is that there are striking similarities in the expression of most core values, particularly *Impartiality*, *Legality*, *Reliability*, *Equal Treatment*, *Integrity*, and *Professionalism*. Differences exist, for example in values relating to building state capacity (meritocracy, competence, performance) which are more prevalent in developing countries. There is also a difference between “aspirational codes” that emphasize values like service and courtesy to the public and “compliance codes” focusing on values like loyalty to the government and rule following.

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Introduction

A growing body of research in recent decades has worked on the issue of public values in order to understand the wide variety of ethical codes that use these values to guide the proper conduct of public administration (Andersen et al., 2012a; Beck Jørgensen & Bozeman, 2007; Beck Jørgensen & Sørensen, 2012; Menzel, 2007; Van der Wal et al., 2015). The sheer number of values and range of possibilities seen in these codes has led some to refer to a “galaxy” or “universe” of public values around the world (Beck Jørgensen & Bozeman, 2007; Van der Wal et al., 2015). Making sense of these values and describing how they relate to each other – within or between countries – has proven to be a challenge for research.

Despite the existence of these ethical codes around the world, an unfortunate focus on Western countries has arisen in this body of literature. A large number of studies have described themselves as “global” or “international” (Beck Jørgensen & Sørensen, 2012; Menzel, 2007), yet these studies continue to focus on the codes of governments in North America, the European Union (EU), or somewhat more broadly on the Organization for Economic Co-operation and Development (OECD) countries. Even when looking at that wider range of OECD countries, a bias continues – relatively wealthy and stable countries that have had the benefit of nearly two decades of OECD encouragement regarding “core values” (OECD, 2000). What continues to be overlooked in broad comparative studies are countries from Africa, Asia, and Latin America – arguably the places about which we most need to develop a better understanding of public administration practices and the codes that are designed to prevent corruption.

Some studies touch on these developing regions (Andersen et al., 2012b; Beck Jørgensen & Sørensen, 2012). However, even in those cases, the inclusion of these other regions is often limited. In many cases, there continues to be a clear Western focus with the inclusion of one of two countries from other regions. Including codes from developing and non-OECD countries will also be part of an answer to the perennial question if there is a universal understanding of which values the civil service should uphold or if this is specific to the political culture in different countries or regions (Rothstein and Varraich 2017).

Our analysis works to address this issue through a broader analysis of available ethical codes for public administration, extending the focus into Africa, Asia, and Latin America. Examining codes

from a sample of 22 countries, a majority of which come from regions outside of North America and Europe, we hope to contribute to a more comprehensive picture of global public values¹. Furthermore, through stepping back and re-conceptualizing how these values relate to one another, we hope to provide some clarity to the discussion about how codes across countries can be strikingly similar and yet different at the same time. Rather than trying to investigate the effectiveness of these codes or prescribe values that should be included, our goal is to highlight which values are important across all codes, while also diving in to the deeper conversation about how these codes differ and reasons why this might be.

Ethics and Quality of Government

Interest in the state “machinery” has grown a lot during the last three decades. This is in part due to new empirical research showing that what goes on “inside” the state’s administrative machinery has important implications both for the legitimacy of the political system as well as for most measures of human well-being. This includes of course economic prosperity and standard measures of population health but also for more subjective variables such as “happiness” and “social trust” (Hellwell, Huang, & Wang, 2017; Holmberg, Rothstein, & Nasiritousi, 2009; Rothstein, 2013). A beginning was the publication of what is now considered a “modern classic”, namely the volume titled *Bringing the State Back In* (Evans et al., 1985). This development has shifted the interest away from political parties, political ideologies, party systems and interest groups towards factors such as state capacity, the quality of the institutions that implement public policies, and how the public administration operates. Empirical studies have shown that the way the public administration in a country is organized has a large effect on factors such as economic development and control of corruption (Acemoglu & Robinson, 2012; Dahlström & Lapuente, 2017, Rothstein, 2011). One surprising effect of these studies is a re-evaluation of the classical form of public administration known as “bureaucracy”. This specific mode of organization was for a long time seen as an impediment and hindrance to development and democracy (Pierre, 1995). More specifically, the bureaucracy was often described as a hindrance for the implementation of the intentions behind democratically enacted public policies (Rothstein, 1996). Civil servants at various levels, not least the so called “street-level bureaucrats” could derail the execution of policies because they did not understand, or

¹ The countries are: Argentina, Brazil, Bulgaria, Canada, India, Indonesia, Kenya, Mauritius, Netherlands, Nigeria, Peru, Russia, Ruanda, South Africa, Sweden, Tanzania, Uganda, Ukraine, United Arab Emirates, United Kingdom, United States and Vietnam.

did not have the capacity, or did not want to implement the policy in question according to the basic intentions the politicians had wished for in their “policy doctrine” (Lundquist, 1987; Winter, 2003). As one famous sub-title in a classic book about policy implementation put it: “How great expectations in Washington are dashed out in Oakland” (Pressman & Wildavsky, 1984). Add to this the massive critique of “the bureaucracy” for being rigid, elitist, inflexible, secluded, and outright disobedient (Beetham, 1996). To some extent, this has changed and there are now publications with titles such as “In Praise of Bureaucracy” and “The Ups and Downs of Bureaucratic Organization” (du Gay, 2000; Olsen, 2008). An early seminal article published already in 1999 by Peter Evans and James Rauch showed that developing countries with a more formal, meritocratic and rule-oriented type of the so called Weberian bureaucracy had better economic growth (Evans & Rauch, 1999). Others have pointed at the connection between various measures of “good governance” or “quality of government” and variables such as measures of population health, social trust, quality of elections, happiness, and tolerance (Charron & Rothstein, 2017; Halleröd et al., 2013; Norris, 2015; Ott, 2010).

One particularly noteworthy finding concerns political legitimacy. It has for long been taken for granted both by political philosophers as well as by democratization researchers that what makes people perceive their governments to be legitimate is either the standard set of democratic rights or “outcomes” in terms of public services and benefits such as pensions and other social insurances. Several studies based on large comparative survey data gives a different and surprising result. Namely that various measures of the quality of the administrative side of the state machinery are the most important factors when people decided if they perceive their government to be legitimate (Dahlberg & Holmberg, 2014; Gilley, 2009; Linde & Dahlberg, 2017). These are variables like the rule of law, control of corruption, and administrative effectiveness. As stated by one of the researchers in this approach: “This clashes with standard liberal treatments of legitimacy that give overall priority to democratic rights.” (Gilley, 2006, p. 58). Democratic rights and “outputs” turn out to be important in these studies, but much less so than “quality of government” factors.

One way to understand this surprising result could be the following. In democratic elections around the world, about a third of the electorate do not bother to vote. Even fewer make use of their other democratic rights such as signing petitions to politicians, taking part in political manifestations on the streets, or writing op-ed articles. In many cases, voters live in a constituency where her preferred candidate or party has been in the minority for a very long time and is likely to be so in the

foreseeable future (for example, a Republican living in Manhattan). Thus, many citizens do not bother to use their democratic rights. The question is then, what happens to their lives? Usually nothing, life just goes on. However, what if you cannot afford to pay the bribes asked for at the public hospital for getting health care to your sick children? Or what if the police will not protect you because you belong to a minority? Or what if you do not get that job in city hall that you are most qualified for because you are a woman? Or what if the fire brigade will not show up because you call from the “wrong” part of the city? In situations like these, when the institutions that are responsible for the implementation of public policies fail to perform according to expected standards, you will be in a dire and maybe dangerous situation. The point we want to make is this: Without disregarding the importance of democratic rights or “policy outcomes”, citizens are much more vulnerable at the point of exercise of political power and at the point of access to political power. In other words, this is why we think that the ethical standard and the competence of the public administration is of utmost importance for citizens when they make up their minds about how to evaluate the legitimacy of their governments.

Another reason for giving more attention to the ethics in the civil service is of course the issue of corruption. Setting aside (for the moment) the problematic issue of how to define corruption, it is clear that this is an issue that concerns many citizens both in the industrialized and developing worlds. To take just one example, according to a British Broadcasting Company (BBC) poll in 2010 surveying 13,353 respondents in twenty-six countries, corruption is the most talked about issue globally, surpassing issues such as climate change, poverty, and unemployment (Rothstein & Varraich, 2017, p. 12). In a number of yearly polls, Gallup USA has reported that since 2010, between 73 and 79 percent of Americans agree to the statement that “corruption is widespread throughout the government in this country.”² These staggering figures are by no means unique but there is considerable variation between countries, from 99 percent in Greece to 26 percent in Denmark. More than ten months before the election that made Donald Trump the President of the United States, the Chairman and CEO of Gallup, Jim Clifton, wrote:

² Thanks to Robert Klitgaard to alerting me to this issue.

*The perception that there's widespread corruption in the national government could be a symptom of citizen disengagement and anger. Or it could be a cause—we don't know. But it's very possible this is a big, dark cloud that hangs over this country's progress. And it might be fueling the rise of an unlikely, non-traditional leading Republican candidate for the presidency, Donald Trump.*³

With hindsight, it seems that Jim Clifton was already in January 2016 on to something important (Rothstein, 2016). His views get support from other empirical studies showing that issues concerning corruption has become much more salient in political life in many countries all over the world. While there is certainly corruption on the “input” side of the political system, for example, in terms of vote buying and practices known as clientelism and patronage, it seems that most of what citizens perceive as corruption takes place in the implementation of public policies (Charron & Rothstein, 2017). One area that seems to be particularly hurt is the public (or publicly financed) health care sector. In many countries, this sector seems to be especially prone to corruption not only in the form of bribes but also in absenteeism and pilfering of drugs (WorldBank, 2010). It goes without saying that issues about the role of ethics in the public administration are central for coming to terms with corruption.

Why ethics in public office is necessary and important

There are certainly many reasons for why special ethical codes for holders of public office as civil servants or professionals working in the public sector are important (Lundquist, 1999; Rohr, 1989; Thompson, 1987). We will here confine the discussion to four reasons for why ethics are important, namely the limit of laws, the role of expertise and knowledge in the design of public policies, the limit of steering by incentives, and the limits that can maybe be understood as a result of “human nature”.

The limit of laws

The rule-of-law has been held forth as one of the main features of what has been conceptualized as “good governance” (Møller & Skaaning, 2014). However, Aristotle already observed that written laws cannot be applied precisely in every situation, since the legislators, "being unable to define for all cases ... are obliged to make universal statements, which are not applicable to all but only to

³ Clifton's analysis can be found at <http://www.gallup.com/opinion/chairman/188000/explaining-trump-widespread-government-corruption.aspx>

most cases” (quoted in Brand, 1988, p. 46). In many public policy areas, it is impossible to create laws, understood as universally applicable rules. Laws can work in cases like public pension when there can be a law stating that a person that has reached age X shall be supported by Y amount of money per month. However, in many cases the state wants to intervene in areas characterized by specific dynamism, uncertainty, and flexibility that laws cannot be formulated with enough guiding precision. The following scenarios help to illustrate precisely this. Decisions by the social authorities if children should be taken into custody because the parents are failing to provide or protect them. Support in the form of re-training or re-location or relief work for people that are unemployed or risk unemployment. Decisions by the social authorities of how much and what type of assistance fragile elderly persons are entitled to. Decisions by the police in a city about when a demonstration should be given permission and when it should not because it would create serious social unrest and maybe violence. Decisions by the social insurance authorities that concerns the right to early retirement pension due to medical inability to carry out paid work. Decisions by the doctors in public hospitals when a woman who so demands should deliver their baby through a cesarean operation. The public prosecutor making decisions about whether to prosecute a young first time defender or not. In cases like these, and many others, the professionals and civil servants that have the direct responsibility for implementing the policies will have to be given ample discretionary room for making the concrete decisions. The reason is that each case is in some ways unique and that it is impossible to state in a law all the circumstances and specificities that has to be taken into account before a decision is made. For example, in determining if a child needs to be taken into custody, it is not only the physical, psychological, and social situation of the child in question that the social worker needs to take into account. It is also in which direction the caretaker(s) are going. Simply put, is the ability of the caretaker(s) to take care of the child improving or deteriorating? Specifying all the elements in a problematic situation like this into a law would create a regulatory nightmare. Instead, in cases like this, it is necessary to rely on the professional competence of the social worker to judge the situation “in total”. For this, discretion is necessary and this is where the importance of professional ethics and norms have a large role to play. The laws that can guide this type of policies has to be “framework” laws that sets some limits and define the discretionary space, but they will not be of much help or have much steering capacity for the “street-level bureaucrat” (this section adapted from Rothstein, 1998, chapter 4). As elegantly stated by Jon Elster (1992, p.2):

The life chances of the citizen in modern societies do not depend exclusively on market choices or governmental decisions. To an increasing extent, they also depend on allocations made by relatively

autonomous institutions, beginning with admission or non-admission to nursing schools and ending with admission or non-admission to nursing homes.

Given the discretionary power civil servants and professional corpses working in the public sector have due to the limitation of steering by precise laws, their ability to make decisions according to a set of ethics becomes very important both for the individual citizen but also for the overall legitimacy of the political system.

The Role of Expertise

Civil servants do not only make local discretionary decisions that can be of the outmost importance for the individual citizen. At higher echelons in the state, they also provide elected politicians with analyses and advice in the preparation of laws and policies. It may certainly be the case that such advice and knowledge are based on summaries of established expert knowledge and research that the high-level civil servants simply provide to the elected politician. For the elected politician, it is paramount that this advice is presented in an impartial and nonbiased way and that the civil servants operate under an ethical code that prevents screening out things because of private ideological reasons. However, in many cases one can take for granted that such expert knowledge does not exist or that it does not give a clear-cut guidance for policy formulation. In cases like this, bureaucratic ethics also become important because politicians need to get honest information about alternatives and uncertainty. Teorell (2015) has made a case that one reasons behind outbreaks of war between states is that politically recruited high-level civil servants acting as military advisors have a tendency to provide the politicians with information that underestimate the enemy's military capacity and that seriously overstate their own state's military capacity.

In a recently published book, Dahlström and Lapuente have made a strong case for the positive effects of controlling corruption through a meritocratically recruited civil service (Dahlström & Lapuente, 2017). They argue that the preferred system is when the power of democratically elected politicians is balanced by the influence of a meritocratically recruited civil service. The causal mechanism they identify is that these groups have different sources of legitimacy and that they are held accountable to different standards. Politicians in power base their legitimacy on the level of electorate support they can muster and also the support they get from party activists to which they are held accountable. Meritocratic civil servants and experts in government base their legitimacy on respect within their peer-groups to which they are held accountable. Dahlström and Lapuente

(2017) argue that when groups with different sources of legitimacy have to work closely together, they will monitor each other and this “pushes both groups away from self-interest towards the common good”. Logically, this also implies that “abuse of power will be more common if everyone at the top has the same interest, because no one will stand in the way of corruption and other self-interests”. Thus, what determines success or failure in these two groups are very different and they point specifically at the importance for high level civil servants to be seen as following ethical codes by the peers in their profession. This elegant theory is supported by a wealth of both historical and large-n comparative empirical analyses. Empirically, meritocratic recruitment of civil servants, as opposed to political appointment, is found to reduce corruption and increase the quality of government. This remains true even when the authors control for a large set of alternative explanations, such as political, economic, and cultural factors, that previously were seen as important for the functioning of the public sector. The conclusion is that a professional bureaucracy, in which civil servants are recruited strictly on the basis of their qualifications and skills, rather than their loyalty to the politicians, is a very important for increasing control of corruption.

The limit of steering by incentives

The third limit we want to emphasize is the role of steering complex organizations by economic incentives. This is something that has become central in the governing models of the public sector in many countries under the rubric of “New Public Management” (Christensen & Læg Reid, 2011). The central idea has been to import models from the private and for-profit sector to the public administration to make the latter more effective and oriented to serve its “customers”. A question is what such economic models entail. As argued by Gary Miller (1992, 2000; Miller & Whitford, 2016), in the general study of organizations, two quite different schools exist in parallel intellectual universes. The one, based in neoclassical economics, views the organization as a system of incentives. The critical task, according this theory, is for the “principal” (read: management) to create an incentive structure that rewards the rational self-interested “agents” to fulfill the goals of the organization. Once the “correct” incentive structure is put in place, the role of the leaders of the organization is minimal. The other school, which consists mostly of behavioral social scientists, instead sees the organizations as a common culture held together by strong social norms about motivation and professional ethics. Accordingly, the task of management is therefore to inspire individuals to share the goals and ethics of the organization, and to cooperate of their own accord to attain them.

In the area known as game theory, a number of researchers has pointed to what they define as an “impossibility theorem” in the incentive-based principal-agent model (Fehr & Gächter, 1998; Lichbach, 1997; Miller & Hammond, 1994; Miller, 2000). The main problem is that for management (principal) to design a “correct” incentive structure in a system with rational self-interested workers (agents) runs into an unsolvable information problem. Because of these information problem, managers (=principal) cannot design an incentive structure capable of inducing the “agents” to cooperate and to work efficiently in the organizations best interests. The reason is, simply put, that in order to design the ”right” incentives, the ”principals” need information about the work process from the ”agents”, for example which tasks that are easy and which are difficult. However, the ”agents”, which according to the theory, are self-interested utility maximizers, this implies that they have no incentive to reveal this type of critical information because they have good reasons to believe that the ”principals” will use the information against them, for example, to squeeze more effort for less remuneration out of them. Following the standard logic of game theory, there is simply no reason for rational, self-interested “agents” to act cooperatively towards managers in such a “game”. This leads to a situation in which the “principals” will not be in possession with the type of information they need for creating a “correct” incentive structure. The end situation is likely to create pathological dilemmas of collective action where the agents are forced to take part in a “race” that will destroy the most precious assets of the organization. We can assure that this is not a “pure academic” problem. Take universities in Sweden. They get money from the government for each student they “produce”. However, what is to be the required level of knowledge for, say, a Master in Political Science is information that the Ministry of Education cannot be in possession of. For the departments in Political Science, this leads to a situation where they are in competition for scarce resources alongside other social science departments within their university. Being self-interested utility maximizers as the theory presumes, they will respond by lowering the demands they put on the students and this will create a “race to the bottom” in which the departments will squander the main asset of their universities. Such a situation can only be avoided if the teachers responsible for the quality of the education are motivated not by rewards from an economic incentive system but instead by strong professional norms and ethics.

According to Miller, the great risk for opportunistic behavior and non-cooperation within organizations imparts an altogether fundamental role to management - that of creating trust among employees and between departments (Miller, 1992; Miller & Whitford, 2016). Morally based personal leadership and cooperation-oriented organizational cultures are crucial factors for overcoming the

problem of collective action in organizations. A strategy based entirely on economic incentives is doomed to failure, according to Miller; indeed, he goes so far as to claim that those organizations which succeed in creating a culture of cooperation based on shared norms between employees and management will always enjoy a comparative advantage over those which fail so to do. This, we would like to underline, is not an argument against systems that measure quality and various forms of evaluation. Our argument is that systems that are driven mainly or solely by the incentive-based “principal-agent” model are very likely to fail if they are not also complemented by strong professional norms and ethical standards. One could say that the more NPM models are used, the stronger the need for ethical standards will be.

Public Ethics and Human Nature

A fourth reason for the importance of ethics has been presented by Francis Fukuyama (2014). His argument is maybe somewhat too “biological” for our taste, but we think it is important given what we see when we study the level of corruption and similar problems of public sector ethics around the world. In short, Fukuyama argues that if we for whatever reason come into a position of power in public life, our “natural inclination” is to use this power to promote our self-interest, our family, kin and clan – and one could add religious faction, business interest, or political party. Fukuyama emphasizes the strong inclinations people in power have for nepotism. A concrete example follows: a public school announces a position as teacher in mathematics and there are two applicants. A is the most qualified, but B is also qualified but a lower level than A. However, B happens to be the nephew of the School Principal who knows that B is in desperate need of a job. Historically and also in most contemporary countries in the world, a fair guess is that B stands a better chance of getting the job than A. Fukuyama’s conclusion, and we tend to agree, is that the understanding that norms like impartiality and selfless promotion of the common good in the exercise of public power should take precedence in a case like this is thus something that must be learned through some form of education in the public ethos.

To sum up this section, we have identified four reasons why there can be a need of ethical codes for the public administration. There are limits to what laws can do, to the role of using economic incentives, and there are arguments for why “human nature” as self- or group interest can be problematic. In addition, the role of high-level civil servants in delivering expert knowledge can also be problematic because of the risk of ideological or political bias. As John Rohr stated the problem in one of the first analysis of this problem:

because bureaucrats govern through authority that is discretionary, and because they are not elected, the ordinary means of popular control are inapplicable. To the extent that formal, legal or institutional controls over the bureaucrat's behavior are either nonexistent or ineffective, bureaucrats have an ethical obligation to respond to the values of the people in who's name they govern" (Rohr, 1989, p. 4).

What are we talking about when we talk about ethical codes and public values?

Ethical codes are nothing new to society. For millennia, these codes have taken the form of religious moral codes, legal edicts, and professional guidelines. This history of norms, values, and codes have guided public life, often aimed at curbing corrupt behavior and defining how one serves the public interest. These values can guide how public servants interacts with citizens, how they conduct themselves honestly, how they keep their personal views from affecting their behavior, and much more. Depending on how one defines a *value*, there is a universe of potentially hundreds of discretely defined values existing in the world's ethical codes. Some have provided rather simple explanations of values, such as Van Wart: "Values define what is right and wrong" (1998, p. xvii). Others have provided a bit more detail, such as Klamer, who defined values as "qualities that are appreciated for contributing to or constituting what is good, right, beautiful, or worthy of praise and admiration" (2003, p. 195). Whatever the definition, ethical codes for public administration contain values that cover a wide range of issues, often blending with and overlapping one another.

In the modern era, an international cooperative effort has emerged that works to create ethical codes that guide public administration around the world. Beginning in the 1960s, ethical codes for parts of public administration became increasingly prevalent around the world (Kernaghan, 2003). In 1978, the United States created the Office of Government Ethics and attempted to institutionalize a code of ethics for the entire public sector (Lewis & Gilman, 2005). Continuing through the 1990s, numerous countries created ethical institutions and codes, including countries as varied as South Africa, Argentina, Uganda, Norway, the Philippines, and Namibia (Ibid.). In 1996, with the creation of an anticorruption treaty by the Organization of American States, multinational bodies began to develop agreements regarding the international requirements for public sector ethics (Ibid.). Other conventions and agreements would follow, in places like the OECD and African countries, ultimately leading to the UN Convention against Corruption in 2003 (Ibid.). Additional

agreements were crafted in the years that followed and this development continues around the world today.

Ethical codes now exist at the national level for the public administrations of the vast majority of countries around the world. While we cannot say for certain how many countries have these codes, at least 154 countries have developed these codes (Garcia-Sanchez et al., 2011) – a number has likely grown in recent years. Despite the increasing global cooperation on this issue and growing interest in understanding these codes, there is not yet a perfect profile of this body of guidelines. These codes that guide public administrations around the world are not monolithic. Guided by contemporary trends or local and regional contexts, the codes vary significantly in style, scope, tone, and length. Each country (or, perhaps more accurately, the government in power at the time of the construction of the codes) has their own motivation for approaching the code in the way they did.

Yet we find ourselves asking, *Are these codes truly so different from one another?* Beneath the surface, do these codes vary as much as they might appear to at first glance? Some argue yes. Others do not see such a large difference, instead describing threads that exist throughout the codes of the world. In the sections that follow, we take a closer look at the findings of other researchers, particularly in terms of core values that one finds across codes.

What has previous research found?

As the agreements and codes described above developed, Lewis and Gilman (2005) suggest that a consensus of sorts began to form around the concept of public service values⁴. Indeed, many organizations support the idea of core common public values across countries. The OECD settled on defining eight core values, based on the most commonly occurring values in the ethical codes of their member states, which included *impartiality, legality, integrity, transparency, efficiency, equality, responsibility, and justice* (2000). The United Kingdom's Committee on Standards in Public Life (CSPL) de-

⁴ The available literature employs a range of terms referring to *ethical codes*: *codes of ethics, codes of conduct, administrative ethics, values, public values, standards, principles*. Some have contended that there is an important difference between terms, such as *codes of ethics* and *codes of conduct* (Gilman 2005). Generally speaking, *codes of ethics* describe values while *codes of conduct* describe practical ways of putting these values into practice. There does not presently appear to be an accepted consensus regarding the use or definition of these terms, although these terms do seem to capture the same general concept. Oftentimes in national codes, the line blurs between descriptions of values and the prescription of behavior. This report uses both *ethical codes* and *public values* at times, with *ethical codes* meaning the more detailed codes put in place while *public values* describes the concepts and principles that guide them, although for the purposes of this article these terms are generally interchangeable.

defined seven similar core values that drove the work of public administration: *integrity, accountability, selflessness, objectivity, openness, honesty, and leadership* (Nolan & Nolan, 1995). The EU implemented its own ethics framework for public administration with the core principles of *rule of law, impartiality/objectivity, reliability/transparency, duty of care, courtesy, and professionalism/accountability* (Moilanen & Salminen, 2007). These are just a few of the organizations that have defined core values, but one can see overlap in these values.

Globalization appears to have presented a framework upon which various national, international, and corporate initiatives could form, slowly coalescing around a number of core values. While Lewis and Gilman believed that cultural specifics drive differences between the complete lists of values to which countries subscribe, they argued that the core values that emerged from these processes were *honesty, transparency, and professionalism* (2005). Other authors have suggested that similar core values emerged, such as *honesty, trust, and stability* (Cooper & Yoder, 2002). In terms of specific behavior, bribery slowly emerged as a rejected practice throughout the world (Gilman & Lewis, 1996).

Classification of Values

Expanding upon these ideas, comparative studies of ethical codes and public values have often developed classification systems. Gow (2005) describes four categories: political, professional, ethical, and personal. Some of these categories feature overlapping or duplicate values. Lawton (2005) presents a similar framework, arguing that there are five kinds of accountabilities (bureaucratic, legal, professional, political, market, peers), each with their own value emphasis (efficiency, rule of law, expertise, responsiveness, loyalty), respectively. A public official could be subject to the expectation of a specific primary value depending on the situation or organization (Ibid.). Beck Jørgensen and Bozeman (2007) crafted a classification system based on value categories, which defined how values guided particular actions of public servants, such as contributing to society, transforming interests to decisions, and the relationship between public administrators and citizens. This work continued in a study that declared there were nine core values across these categories, guiding public servants: *public interest, regime dignity, accountability, openness, neutrality, impartiality, effectiveness, legality, and political loyalty* (Beck Jørgensen & Sørensen, 2012).

However, despite the efforts at organizing these public values, what has not emerged from the literature is a clear picture or agreement about these clusters or core values. While Beck Jørgensen

and Sørensen (Ibid.) argue for seven value clusters with 72 possible values and nine variations of core values overlapping in these clusters, Van der Wal and Huberts (2008) suggest as many as 30 value clusters, drawn from 538 stated values. In a survey of Dutch public administration ethical codes, de Graaf et al. (2014) find 10 core values that differ from the findings of Beck Jørgensen and Sørensen (2012) in important ways, such as the lack of *public interest* as a value in the Dutch codes, while including other values like *participation*.

Unfortunately, much of the comparative work has focused on a very limited sample of the world. The bulk of the available literature addresses the codes in relatively wealthy and developed countries within the United States, Europe, and the OECD, with little attention paid to the rest of the world. Oftentimes, in cases where a study claims to address the ‘international’ situation (Menzel, 2007), the focus continues to be Eurocentric. ‘International’ unfortunately does not necessarily mean ‘global’. In their study that declared ‘global public values’, Beck Jørgensen and Sørensen (2012) only reached slightly outside this limited sphere. Out of the 14 countries they examined, only two came from outside the OECD, and only one of those non-OECD countries – South Africa – came from outside of Europe, while Asia and Latin America were only represented by the OECD countries of South Korea and Mexico. While that study took the step of expanding the scope beyond what was seen in previous studies, the authors openly acknowledge the limitations in their sample, stating that their study “may be subject to a Western bias” in both their approach and sample (Ibid., pg. 90). They conclude that future research needs to broaden the scope of countries examined in order to address this bias.

Outside the West

Despite the limitations of the studies above, do we see any of these patterns extend beyond Western democracies? In regions outside North America and EU, there has been some work on comparing ethical codes, although the available literature is relatively sparse. Stepping just outside the EU, surveys of new democracies in Central and Eastern Europe (still including countries both within and outside the EU and OECD) found common values in the ethical codes of these countries (Palidauskaite, 2006, 2011). The most common principles found in these codes were *legality*, *servicing the public interest*, *political neutrality*, *professionalism*, *impartiality*, and *loyalty*. The author attempted to describe a hierarchy of principles that most consistently dictate ethical behavior for civil servants. Furthermore, the author found that these transitional states leaned more heavily on values that

were more prevalent under the Soviet regime, such as *loyalty*, *obedience*, and *servicing state or party interests* (Ibid.).

Outside of Europe, the research is much more limited. Many studies that exist focus on evaluating the ethical codes of individual countries, such as Venezuela (Andrews 2011) and China (Ma, 1998). Other studies compare aspects of a Western code with a non-Western one, such as the United States and China (Pitta et al. 1999; Smith 2004) and the Netherlands and China (Yand & van der Wal, 2014). However, these studies are often limited in scope and the findings are not generalizable, so they do not provide the details necessary to determine core global public values or other patterns across countries. The majority of articles examining this issue focus primarily on the content of codes *within* regions, rather than *between*. In terms of geography alone, there appears to be a large gap in our understanding on this issue.

Signals in the Noise

If there are indeed differences between codes across countries and regions, what factors could explain these differences? Perhaps the most popular explanation for ethical differences across countries and regions is culture. Hofstede's (1980, 2001) work on cultural dimensions seems to be the most commonly cited work for this perspective. This work has guided decades of studies, including the study of ethical codes for public administration. Most relevant to our interests, Beck Jørgensen and Sørensen (2012) conclude that the primary reason for differences across codes is the political or national cultures. A general consensus seems to be reached in the literature that culture drives many of the differences in public service ethical codes and values.

However, based on the evidence in the body of literature so far, we find ourselves in a difficult position if we assume culture is the key reason for differences in codes. First, if culture is the guiding force behind these codes, we could expect to see vast differences in the body of codes, just as we see across cultures. For example, we might expect codes in North America to be remarkably similar to one another while vastly different from the codes in Africa, which in turn would be much more similar to one another. Second, these differences would likely manifest as unique sets of values in different cultural regions, with a large number of values that only apply to the specific cultural context of those regions.

But if these codes are not so different and are not defined along clear cultural lines, then what factors could help explain these differences? We suggest that differences in these ethical codes are not so great and can instead in many cases be explained by historical momentums, regulatory environments, the spread of new public management ideas, and other factors like economic pressures.

Historical Factors

Six and Lawton (2013) argue for a kind of historical approach to viewing differences between attitudes toward corruption and the development of integrity systems, such as ethical codes. These authors define the following four institutional logics based on past experiences that can describe a government's current experience of corruption, which in turn could affect the ethical codes put in place:

- *Dominant ethical institutional logic*: countries where the government seems to have a consistent and long-term approach to preventing corruption
- *Dominant corruption institutional logic*: countries that have struggled with corruption and has not yet put adequate measures in place to fight it
- *From corrupt to ethical institutional logic*: countries where significant steps have been made to turn around a history of corruption
- *Dominant ethical institutional logic*: countries where measures are in place to prevent corruption, but significant lapses can occur

An examination of some ethical codes reveals these historical patterns. In Finland, a country Six and Lawton describe as having a dominant ethical institutional logic (Ibid.), the core values that exist for public service are *independence, impartiality, objectivity, trustworthiness of government, transparency, service-mindedness, and sense of responsibility* (OECD, 2000). Compare this with Bulgaria, a country Six and Lawton describe as having a dominant corruption institutional logic (2013), where the core values for public service are *lawfulness, loyalty, responsibility, stability, political neutrality, hierarchic subordination, openness, disinterestedness, and confidentiality* (Palidauskaite, 2011). Despite the similarities between these two, such as *impartiality/objectivity/neutralty, transparency/openness, and responsibility*, there also appear to be important differences, such as *independence* versus *loyalty/hierarchic subordination*, and *service-mindedness* versus *disinterestedness*. From a high-level view, Finland's values focus on engagement with the public and creating a government that can be trusted, while Bulgaria's values focus more on detachment from the public and respect for the government or parties in power. For a country that has historically endured less corruption, Finland's values aid in maintaining those low levels,

while Bulgaria's struggle with corruption seems less likely to improve if public administration values serve the government more than the citizens. If these historical patterns match with similar values in other countries, it suggests that this factor could help explain differences across ethical codes.

Aspiration vs. Compliance

Whether ethical codes focus on inspiring public servants or focusing on compliance with rules also could result in different emphasized values. In evaluating ethics regimes, Washington & Armstrong (1996) identified *aspiration-based* ethics regimes versus *compliance-based* ethics regimes. Mapping OECD countries across this spectrum results in a distinct landscape that groups together countries like Mexico and Portugal in with compliance-based ethical codes, and New Zealand and Norway together with aspiration-based ethical codes. Rather than being motivated by culture, there is evidence that compliance-based codes are more necessary in countries where the regulatory environments are weak (OECD, 2000). To further complicate matters, if these patterns do indeed exist, they are not necessarily consistent across all agencies in a government. For example, a study of public institutions in the United States found that some had aspirational codes that focused on ideal behavior, while others had operational codes that focused on compliance and sanction (Meine & Dunn, 2013). What seems clear is that even within North America, Europe, and OECD, this ethical landscape is a complex one that extends beyond culture alone.

New Public Management

Since the emergence of new public management (NPM) in the 1980s and subsequent global spread in the 1990s, it has had a significant impact on public administration. In an effort to reform public administration in the 1990s, privatization of public services was encouraged as a means for improvements. As this occurred, the private sector increasingly influenced the way that public administration was handled. Hood (1995) defined a number of ways in which increased private sector involvement in the public sector altered the delivery of services, such as stressing frugality and outputs, which in turn could affect the ethical codes. The public and private sector have their own distinct sets of values that influenced management (van der Wal et al., 2008). As the private sector becomes increasingly involved in the public sector, *efficiency* and *productivity* take precedence as values while *equity* and *representativeness* take a backseat (Haque, 1996). This spread of private sector influence was uneven and there were different degrees of NPM implementation across countries (Pollitt 2001). With a discrepancy between public sector and private sector codes, it follows that there will

also be a discrepancy between the codes of countries more heavily influenced by NPM compared to those less influenced by it.

These concerns arise in an OECD report on the content of ethical codes (2000). The summary of that report identifies decentralization and the implementation of private sector methods as potential difficulties, as these have led to “a fragmentation of ‘traditional’ public service values, standards and ways of operating” (Ibid., pg. 11). The report finds that *impartiality*, *legality*, and *integrity* are traditional values that are widespread throughout OECD countries, but that these values are now complemented by new values such as *transparency* and *efficiency*. This concerns some authors, as these values – and values like *consumerism*, *competition*, and *profit* – are potentially in conflict with more traditional values found in African and Asian countries, such as *solidarity*, *social obligation*, *sharing*, *community support*, and *consensual decision-making* (United Nations, 2001).

Core Value Clusters

The existing research focus on the ethical codes for public administration in Western countries, along with an emphasis on culture as the explanatory factor for differences in these codes leaves us with the following questions:

- Do we find the same core values in the public administration ethical codes in Africa, Asia, and Latin America that other researchers have found throughout North American, European, and OECD countries?
- Are there important differences between these codes across regions?
- If there are differences, are these the result of culture or other explanatory factors?

To address these questions, we surveyed the codes of 22 countries around the world. The sample includes countries from the OECD and the EU that are frequently seen in previous studies, including Canada, the United States, the United Kingdom, Sweden, and the Netherlands. The existing body of literature has well established the similarities found between the codes of countries in these Western regions, so we did not focus extensively on this region and instead used a small sample to compare to the other regions in the world. We looked at codes from Bulgaria, Ukraine, and Russia in order to capture values from the broader European context, and specifically to provide some insight into any post-Soviet commonalities. From Latin America, we examined Argentina, Brazil, and Peru. In Asia, we looked at India, Indonesia, and Vietnam, countries that allowed the inclusion

of a wide range of cultures, religions, and political backgrounds. In the Middle East, we examined United Arab Emirates, one of the few codes from that region available in English. In Africa, we looked at the widest range of countries, including Uganda, Rwanda, Kenya, Mauritius, Nigeria, South Africa, and Tanzania. This sample allows for insight from a group of countries with diverse backgrounds, populations, and political experiences.

We took an exploratory approach to examine the manifestation of these values in the ethical codes, hoping to identify patterns and understand why ethical codes around the world are both similar and different. Given the degree of agreement across descriptions of core values around the world, our efforts attempt to discover the concepts that bridge codes around the world. Each code was reviewed against a list of possible values gathered from previous studies. Codes were also examined for compliance- or aspirational-based approaches.

Clear patterns emerged across these codes and we found evidence supporting many of the same core values established by previous research. Based on these patterns, we propose a framework that groups values into nine core value clusters. Each cluster captures a high-level ethical concept found in every code examined in this study. The core value clusters we identify are similar to those found in other analyses of ethical codes. With these clusters, we hope to provide some clarity to the wide range of high-level values that are a part of all countries. At the same time, these clusters allow for flexibility within each cluster to accommodate the contextual factors that make each country unique. Ideally, these clusters not only allow for seeing the shared features between codes, but also help to better highlight differences and explain why those differences exist.

The nine core value clusters we find across the codes are *Impartiality*, *Openness*, *Integrity*, *Legality*, *Loyalty*, *Equal Treatment*, *Reliability*, *Service*, and *Professionalism*:

- The *Impartiality* cluster contains the values that guide the making of fair decisions that affect the public.
- The *Openness* cluster contains those values that guide the treatment and openness of information.
- The *Integrity* cluster contains those values regarding ethical behavior when interacting with the world.

- The *Legality* cluster contains those values that describe how the public administration regards the law.
- The *Loyalty* cluster contains those values that dictate where the allegiances of public servants lie.
- The *Equal Treatment* cluster contains values that guide the public administration's concept of equality and justice, both in dealing with the public and within the workplace.
- The *Reliability* cluster contains values describing commitment to the job.
- The *Service* cluster contains values that describe a public administrator's performance toward the public and care for clients.
- The *Professionalism* cluster relates closely to the Service cluster, but focuses inward on the performance of tasks and creating an efficient workplace.

Table 1 below lists the values that are included in each cluster⁵. These lists of values are not exhaustive. While a reasonable attempt has been made to embody the wide variety of possible values in these lists, the universe of potential values is vast. The lists here are instead representative of the values commonly observed in the sample countries. Furthermore, there are important values found in the codes that fall outside these clusters, some of which are discussed later in this report.

⁵ Throughout this report, for the sake of both brevity and clarity, core value clusters are capitalized ("*Impartiality*") and the specific value sharing that name uses lower-case lettering ("*impartiality*").

TABLE 1, CORE VALUE CLUSTERS

Impartiality	impartiality, objectivity, (political) neutrality, fairness, unbiased
Openness	openness, transparency, open competition, personal financial transparency, secrecy, confidentiality of government documents
Integrity	integrity, honesty, truthfulness, honor, confidentiality of clients, privacy, anonymity, discretion, legitimacy, decency, accountability (to the public and/or government), ethical conduct, respectability, public interest, public trust, reporting misconduct, safeguarding public funds and property, discipline, austerity, personal financial responsibility
Legality	legality, lawfulness, rule of law, supremacy of law, respect for law, correct application of law, carrying out of lawful orders
Loyalty	loyalty, loyalty to government, loyalty to constitution, loyalty to laws, loyalty to citizens, loyalty to country, loyalty to ethical code, respect for government, respect for citizens/state, hierarchic subordination, obedience, patriotism/nationalism
Equal Treatment	equal treatment, respecting rights, equity, equality, justice, human dignity, respect for others, non-discrimination, non-harassment, inclusiveness, representativeness, diversity, meritocracy
Reliability	reliability, duty, devotion, diligence, commitment, responsibility, dedication, stability
Service	engagement, humility, courtesy, customer-friendliness, care, flexibility, responsiveness, selflessness, sympathy, promptness, modesty, creativity, clarity, accessibility, attentiveness, capacity, leadership, sense of calling, sense of service, independence, disinterestedness, innovation, quality, speed, excellence in service
Professionalism	professionalism, accuracy, competence, effectiveness, efficiency, trained, uniformity, productivity, punctuality, cost control, specialization, experience, performance, expertise, teamwork, personal improvement, proper use of resources, following procedures

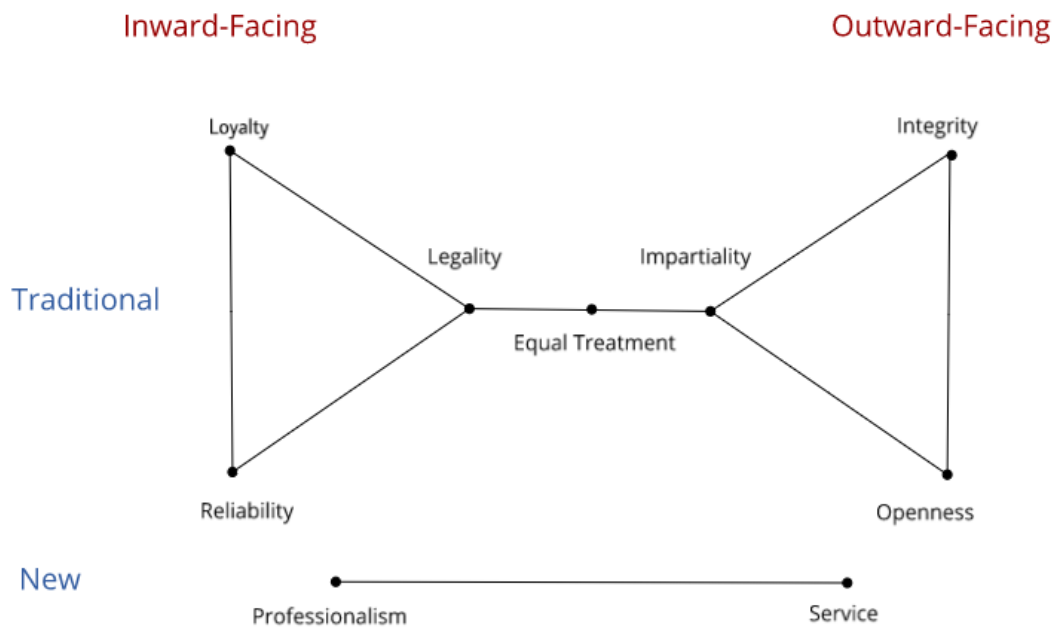
Some values could straddle two or more of these categories. While we made the choice to assign values to only the most appropriate cluster, a certain degree of ambiguity is inherent in these values and therefore leads to some subjectivity in the classification process. For example, aspects of Equal Treatment (*non-discrimination*) relate to Impartiality (*being unbiased*); Reliability values relate to those seen in Loyalty; and there is a fine line between certain values contained in Service and Professionalism. Other studies have encountered this same ambiguity and struggled to provide a perfect resolution. In order help explain the similarities and overlap between these clusters, we created a constellation of values that maps these relationships.

Constellation of Values

Based on the patterns found in the clusters of values above, we arranged the core value clusters in relation to one another to make more sense of their overlap. Building on the idea that there is a universe of values in the world, like stars in the sky we arrange our clusters in a constellation. The use of the term constellation is hardly a new one to the field of analyzing values, having been used in a number of studies regarding the universe of public values (Beck Jørgensen & Bozeman, 2007; Kernaghan, 2000). However, in these cases, the term constellation referred to either the entire field

of possible values or what we instead refer to as clusters of values. For us, the term *constellation* refers specifically to the structured arrangement of stars in the sky in relation to one another. We approach our core value clusters in much the same way, arranged in relation to one another as seen below in Figure 7.

FIGURE 1, CONSTELLATION OF VALUES



This constellation of values arranges our core value clusters along two conceptual spectrums: *Traditional* values and *New* values⁶. Traditional values are those that have long been enshrined in ethical codes, even stretching back into antiquity. New values, on the other hand, refer to those values that have emerged globally more recently, especially with the spread of NPM and similar attempts to reform the public sector with methods from the private sector. The OECD acknowledges this difficult balance between “traditional” values, such as *integrity*, *legality*, and *impartiality*, and “new” values, such as *efficiency* and *transparency* (2000). The other spectrum differentiates between *Inward-Facing*

⁶ An alternative conceptualization of the value spectrum could also be Moral values (such as integrity) and Instrumental values (such as efficiency), as described by van der Wal & Huberts (2008). While we end up with the same structure for the spectrums, this way of articulating the difference between the ends of the spectrums helps to illustrate a different pattern in the grouping of values. However, this conceptualization distracts from our primary concerns in this analysis, and also opens the door to some slippery philosophical discussions about the nature of values. For this reason, the description of Traditional versus New values seems most appropriate.

values and *Outward-Facing* values. Outward-Facing values guide how public servants interact with the public. Inward-Facing values guide how public servants relate to the workplace and the government under which they work.

The value clusters that are highest on the Traditional spectrum, *Loyalty* and *Integrity*, have existed throughout history. Closer to the New values are *Reliability* and *Openness*, values that have become more present in codes over time. In between, we find *Legality* and *Impartiality*, values that have existed throughout history, but linked through *Equal Treatment*. *Equal Treatment* values relate closely in ways to *Impartiality* values, such as *non-discrimination* and *being unbiased*. *Equal Treatment* values also relate to *Legality* values, as individual rights are often enshrined in constitutions and laws. Near the New value end of the spectrum, we have the *Professionalism* and *Service* value clusters, which emerged through the spread of NPM.

Because the values in the clusters are nebulous, this arrangement cannot perfectly reflect the placement of all values or how they could straddle multiple clusters. However, the clusters are arranged in a way that helps to conceptually map the patterns observed in the values and codes. The arrangement of this constellation helps to understand how these core value clusters relate to one another, rather than how individual values within each cluster relate to one another. We believe this constellation is the most effective way to bring some clarity to the relation between, and overlap of, values.

In the sections that follow, we examine each of the nine core value clusters and explore how the sample countries include each of these clusters in their respective ethical codes for public administration. We also discuss how the core values of these clusters manifest differently and suggest possible explanations for these discrepancies. Following that, we examine the broader patterns that manifest in the codes, working to establish the bigger picture of possible differences between regions.

Impartiality

The *Impartiality* cluster is arguably the most important throughout the ethical codes, as this value is crucial to quality of government (Rothstein & Teorell, 2008; Teorell, 2009). The codes repeatedly name *impartiality* as an important value. Each of the 22 sample ethical codes included some degree of the *Impartiality* cluster in their text, often stressing it as a key value. This is consistent with the

findings of other examinations of ethical codes (Beck Jørgensen & Sørensen, 2012; OECD, 2000), which consistently found *impartiality* as a core value.

However, the exact expression of this value cluster differs at times. Other values within the *Impartiality* cluster include *objectivity*, *political neutrality*, and *being unbiased*. Despite these values being similar to one another, there are important conceptual differences. While nearly all codes included the term *impartiality* or a description that matched the concept, this description was quite shallow at times. Some codes name *impartiality* a core value, but *political neutrality* is the actual focus in the document. In other countries, the *Impartiality* cluster features less prominently, such as Nigeria. In this case, the Nigerian code does not use the term *impartiality*, nor are the other *Impartiality* values explicitly stated – these are left out of the list of core values at the beginning of the document. However, the Nigerian code does stress in its text that public servants shall not engage in political activities or financial pursuits that could compromise their role as an objective public servant. This focus on *political neutrality*, rather than *impartiality*, was also present in other African nations, such as Tanzania and Rwanda.

Overall, the *Impartiality* cluster was shallower in the codes of Africa and Asia than in other regions. Does this mean that *Impartiality* is not a core value recognized by these countries and their cultures? Or does it instead indicate that there are different priorities in the spectrum of *impartiality* values within these countries for specific reasons? Many of these countries come from what would be classified as *dominant corrupt institutional logics*, where the necessary infrastructure has not yet developed to overcome a history of corruption. In this case, these regions have faced greater historical problems of political influence over the public administration, prompting countries presently to focus on addressing that internal neutrality problem before focusing on the broader concept of *impartiality*. As the majority of countries with a focus on political neutrality have compliance-based ethical codes, it lends further credence to the notion that the regulatory framework needs to be addressed first before we can expect to see greater focus on the higher standard of *impartiality*.

Openness

As mentioned above, *Openness* concerns how a public administration views the treatment of information. The ethical codes often embody *Openness* as *transparency*, which ideally means providing citizens access to information about the inner workings of government and allowing them to serve

as watchmen against corruption. As suggested by the OECD (2000), *transparency* is a relatively new addition to the value universe, one promoted in recent decades as part of the NPM push.

At the highest level, all countries placed some value on information transparency. However, variations emerged at the lower levels. Some countries are very clear about the value of transparency, such as Argentina, which stated that information should not be restricted and procurement procedures should be public. Other countries perhaps took this value for granted, merely stating *transparency* and *openness* as important values, with little additional clarification, such as seen in the ethical codes of Brazil, Sweden, Netherlands, Canada, United Arab Emirates, and United Kingdom.

Two countries did not express *transparency* or *openness* in their code to the degree seen in others: Bulgaria and Kenya. However, these codes do include an *Openness* value: *personal financial transparency*. These codes dictate that public administration employees must report their financial holdings in order to guarantee that there are no conflicts of interest during their service. It appears that Bulgaria and Kenya do not place the same value on *Openness* as other countries, where transparency allows the citizens to monitor the government. This value appeared in other non-Western codes, such as India and Nigeria. In all of these examples, this value is in line with other aspects of the codes, which include values for *respecting the government*, *loyalty*, *hierarchic subordination*, and *disinterestedness*. In these cases, the low-level expression of *Openness* suggests the public service aligns more closely with the government than with the public.

Secrecy and *confidentiality* are included in this value cluster and provide interesting insights regarding perspectives. While virtually all countries see sharing information with the public as a value, certain countries also specify that *secrecy* is an important value regarding certain kinds of information. The language regarding *secrecy* seems to be distinct from other instances where codes discuss the importance of maintaining *confidentiality* for certain government documents. *Confidentiality* is an important value in countries all around the globe, including the United States, the United Kingdom, Netherlands, India, South Africa, Brazil, and more. However, the *secrecy* value only appears in the codes of post-Soviet states, Africa, and Asia. As with *personal financial transparency*, the *secrecy* value suggests that countries in these regions perhaps align the public service more closely with the government than the public.

While the *Openness* value cluster appears in all codes, each code expresses it differently. In general, it seems that the broad concept of *transparency* is an important value in Western and wealthier countries, but is quite shallow in its description, suggesting that perhaps these societies take this value as a given or encode this value in transparency laws. Throughout the non-Western world, we see a greater focus on *personal financial transparency* for public servants. While this could be a cultural factor, it is also possible that this is due to greater incidence of bribery in these areas. Financial transparency allows the government to monitor public employees and ensure that they are not living beyond their means, which would suggest that they are the recipients of bribes. It also potentially helps address conflicts of interest, preventing someone from being in a position where they are involved in decisions that affect one of their assets. If *transparency* is indeed a newer value that is spreading, these countries might not yet have the regulatory framework in place to make governmental information transparent in the way that more developed countries can.

Integrity

Integrity is a broad category of values, some of which other studies list as separate core values. Some researchers have defined *integrity*, *public interest*, and *accountability* as core values that are completely separate in those value frameworks. The defined core values of other systems give different priority to the values from the *Integrity* cluster: the OECD identifies only *integrity* as a core value (OECD, 2000); the EU lists only *accountability* (Moilanen & Salminen, 2007); and in Eastern European countries, Palidauškaite lists only *public interest* (2011). Clearly, there is some disagreement about the importance of these values.

However, we find the most sensible arrangement to be the grouping of these related values in one cluster, which we simply call *Integrity*⁷. The very nature of being a public servant demands working in the public's interest and being accountable for such – creating the condition in which a public servant can only maintain internal moral consistency by fulfilling these values. It is hard to say that one shows integrity if one betrays the moral guidelines that underlie the concept of public service. This cluster also includes values regarding *ethical conduct*, *honesty*, *honor*, *discipline*, *reporting misconduct*, and *discretion*.

⁷ Defining *integrity* as “the quality of being honest and having strong moral principles” and having “internal consistency” (Integrity 2017), being accountable and working in the public's interest are important parts of this concept.

These values tie in with one another in some codes. When expressing the importance of *accountability*, this value manifested in ways that tied it to either *public interest* or *integrity*. Brazil's code, for example, makes public servants personally accountable for their decisions and focuses on how this is important because of the *public interest*. This is similarly stated in the codes for Mauritius and the United States. Other codes, such as Indonesia, point out that public servants are *accountable* to the public and stress *public interest* several times, but also contradictorily suggest that the state's interests should always be put first. The United Kingdom discusses this value in terms of being accountable to ministers.

Despite some ethical codes not including each of these values, 12 of the sample countries did explicitly state that all three values – *integrity*, *accountability*, and the *public interest* – were important to public service. However, there is a great deal of flexibility within this cluster – there was a wide range in the ways that *Integrity* manifested within the codes.

While the majority of codes explicitly stated *honesty*, *truthfulness*, and *ethical conduct* were essential to the conduct of public administrators, other *Integrity* values were limited to certain codes in certain regions. For example, only the codes of Russia, Vietnam, Brazil, and Peru included *honor*. Similarly, *discipline* appeared only in the codes for Uganda, Tanzania, India, Vietnam, and Indonesia. It is interesting that these values were exclusive to codes outside of North America, the EU, and OECD.

One way that some countries expressed *Integrity* was through trying to prevent public servants from being financially compromised, expressed as maintaining *personal financial responsibility* in certain countries. The codes for Uganda, India, and Kenya expected that public administrators avoid personal debt, bankruptcy, or otherwise demanded they exhibit personal financial responsibility. Similarly, Argentina expressed *austerity* as a value for their public administrators. The codes suggested two reasons for this: personal debt or extravagant spending could reflect poorly on the public service, and personal debt could lead to a conflict of interest for a public administrator.

Legality

The *Legality* principle was present in all codes and manifested in similar ways. Across the globe, countries made clear that it was essential that the law guide the conduct of public servants. There was a wide range in how codes defined this value, using phrases such as *legality*, *lawfulness*, *rule of law*, *respect of law*, and so on. Many countries made clear that public servants follow orders from superi-

ors, but only when in line with the law. Others were explicit that it was important that administrators correctly apply the law.

Compared to other values, there was relatively little variation among codes regarding the *Legality* value. This comes as little surprise, as the core values suggested by other researchers have usually included one or more value concepts that we include in this cluster. The OECD and Palidauskaite included *legality*, the EU included *rule of law*, and so on. There is clear agreement that the law is a primary guiding value in the duties of the public administration.

However, some variation was detected. For example, countries such as Ukraine, Bulgaria, and United Arab Emirates talked about *supremacy of law*, granting it priority in guiding the behavior of the public servant. On the other end of the spectrum, a country like Brazil described this value differently. Brazil's code talked at length about *balance, order, and grey zones*. One of those grey zones involved the law, where a public servant could obey the law but be neglectful of ethical boundaries. Brazil's codes placed a large amount of responsibility on the public servant to be mindful of balancing these commitments, and using the law as a guide rather than the only guiding factor. Despite a clear difference seen in these examples, these countries were at the extremes of the spectrum regarding *legality*, and there did not appear to be any clear pattern to the *legality* values in the codes around the world. The differences that existed between countries mostly rested on the choice of words, rather than any large differences between concepts of *legality*.

Loyalty

The *Loyalty* cluster is arguably among the more interesting core value clusters. Not all previous studies saw *loyalty* as an important value, while others identified it as a core value in certain regions, such as Paliduskaite's study of Eastern European countries (2011). However, our examination found that values from the *Loyalty* cluster appeared in all codes except two: Canada and Russia. This led us to include it as a core value cluster – although the manifestation and emphasis of this value was quite different across codes.

While a degree of allegiance factored strongly into nearly every code, the target of this allegiance differed depending on the country, culture, or region. The possible targets of *loyalty* were the government, political parties, the constitution, the citizens, the country, or the ethical code. Others

focused on ideas of *hierarchical subordination*, *obedience*, and *patriotism* or *nationalism*, which we also include in this cluster.

Many countries described *loyalty to institutional order*, such as Argentina (“defend the republican and democratic system of government”). Other codes were clearer about public servants owing *loyalty to the government* and *country* – in particular, Nigeria, India, and Vietnam. Nigeria’s code calls for no “divided loyalty”, no working for other institutions, and not engaging in “action prejudicial to the security of the State.” Vietnam states that public servants must be loyal to the Communist Party and Vietnam, and must “safeguard the national honor and interests.” India states that its public servants must “defend and uphold the sovereignty and integrity of India” and does not allow public servants to criticize the government. Similar language regarding *loyalty to the government* or *country* appears in the codes of Indonesia, Kenya, Uganda, Tanzania, and Peru, albeit in less strong language. Many of these same countries also included some degree of *hierarchical subordination* in their ethical codes, including Brazil, India, Indonesia, Nigeria, Peru, United Arab Emirates, and Vietnam. Figures 1, 2, and 3 below show the countries that included *loyalty to government*, *loyalty to country*, and *hierarchical subordination* in their codes, respectively. We can see a pattern in the prevalence of these values throughout Africa, Asia, and Latin America. A similar pattern is found regarding the values of *obedience*, *compliance*, and *patriotism/nationalism*.

FIGURE 2, LOYALTY TO GOVERNMENT

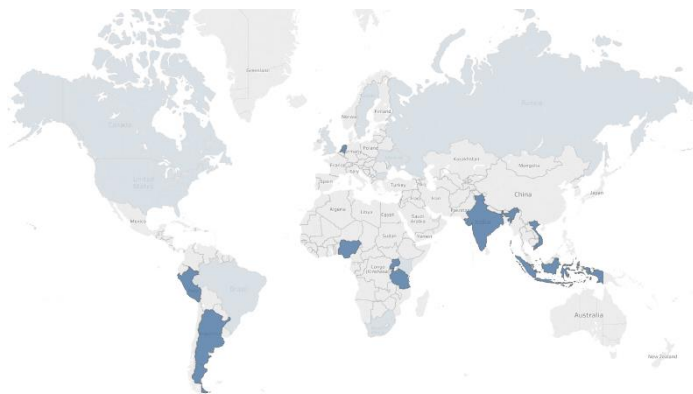


FIGURE 3, LOYALTY TO COUNTRY

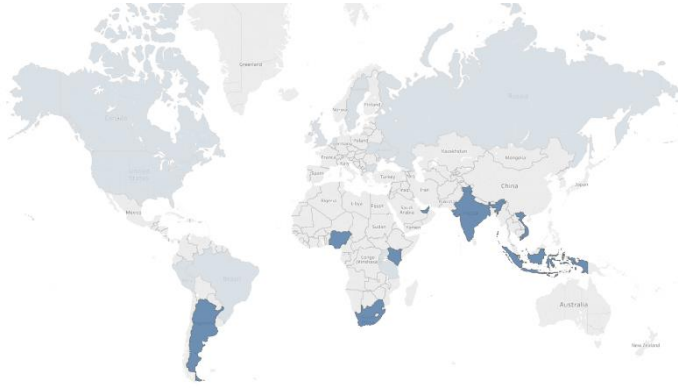
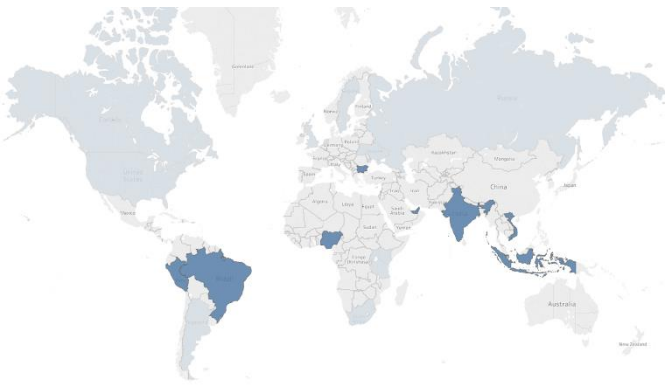


FIGURE 4, HIERARCHIC SUBORDINATION



Alternatively, there are countries that instead frame this value in terms of *loyalty to the ethical code*, *loyalty to the law*, or *respect for the government* (rather than *loyalty*). In those values, shown in Figures 4, 5, and 6 below, we see a different pattern in the countries represented.

FIGURE 5, LOYALTY TO ETHICAL CODE

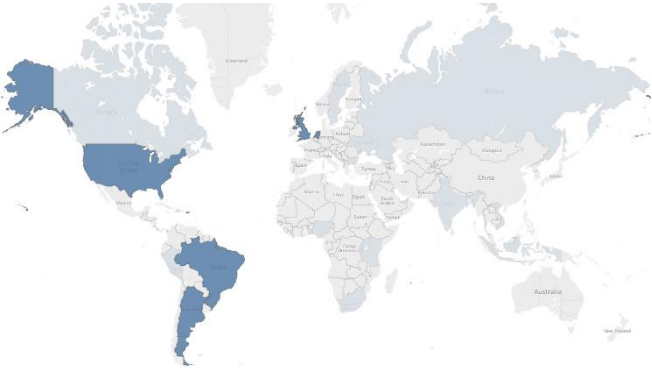


FIGURE 6, LOYALTY TO LAWS

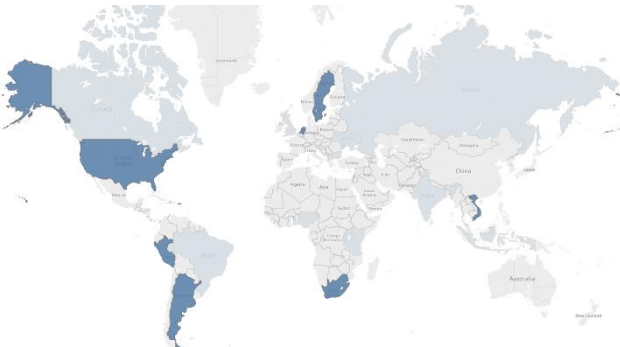
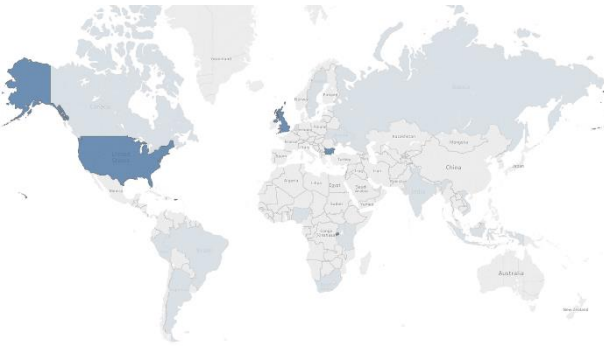


FIGURE 7, RESPECT FOR GOVERNMENT



In these countries, we see much more focus in the codes on ensuring that the public servant works for the people. For example, while public servants in the Netherlands swear an oath of loyalty to the king, they also swear allegiance to the constitution and laws. The Dutch ethical code also states that “allegiance to the public service mission is paramount and rises above loyalty...whenever possible, do the right thing, even if this brings you into a conflict of loyalty with the organization.” Sweden’s code stresses respect for the people and states that “everything you do must be based on law.” In the United Kingdom, the code discusses serving the government, but in a way that “maintains political impartiality” and is dedicated to the “Civil Service and its core values.” In the US, the code states that public servants are responsible to the government and American citizens, but specifically says their loyalty must be to the constitution, laws, and ethical code.

While we find Latin American countries spread across both groups, there is otherwise a noticeable split between regions. One region focuses more on *loyalty to the government, country, and hierarchy* versus the other region that focuses on *loyalty to the ethical code, laws, and citizens*. Although this difference is subtle, it suggests important differences, particularly in dealing with corruption.

To illustrate, let us compare India and the United States. India stresses *loyalty to the government, country, and hierarchic subordination*. If the government engages in corrupt behavior, a public servant faces the dilemma of obeying the hierarchy and being loyal to a government that is perhaps asking them to engage in unethical behavior. On the other hand, a public servant in the United States seems to have more flexibility. The United States code states that public servants must be *loyal to the ethical code, loyal to the constitution, loyal to the laws*, and instead *respect* the government and citizens. This suggests that while a public servant in the United States should respect the wishes of the current administration, if that administration engages in unethical behavior, the public servant’s duty is to obey the ethical code, constitution, and laws. In some cases, according to the ethical code, this might require that a public servant refuse the instructions of an administration, while a public servant in a similar situation in India would seemingly be duty-bound to carry out those instructions. While we do not argue that these codes are necessarily effective, one can see how these subtly different perspectives of loyalty could collectively influence different behaviors in public servants.

Why does *Loyalty* manifest in such different ways? In the case of this value, differences could indeed be due to culture. Previous research has found evidence that power distance has an impact on

public ethics (Franke & Nadler, 2008), suggesting that in places where inequalities and hierarchies are more accepted one can expect to see different expressions of the *Loyalty* value.

Reliability

Reliability values focus on commitment to the job. These differ from *Loyalty* values, although there is overlap between these concepts in some codes. The values in this cluster include *responsibility*, *duty*, *devotion*, *diligence*, *dedication*, and *stability*. In general, *Reliability* values are consistently present in codes, but not always emphasized strongly.

There does appear to be a pattern with the value *stability*. This value was seen in the codes for Russia, Ukraine, and Bulgaria, places shaped by the fall of the Soviet Union and the massive changes faced by those countries in the aftermath. *Stability* was also a focus of supplemental documentation regarding the ethical code in Rwanda. The ethical code for Rwanda was created in 2002, shortly after the Rwandan genocide and the instability in the country that followed. The supplemental documentation addressed instability in the public administration as a concern, creating a Public Service Commission dedicated to maintaining stability and ensuring that the values of the public service were upheld. While *Reliability* may be important in all public administrations, one can see how this value would manifest specifically as *stability* in a country facing such recent massive upheavals as those who have focused more on this value.

Equal Treatment

The values in the *Equal Treatment* cluster concern the concept of equality and rights promoted within the public administration, including *respecting rights*, *justice*, *human dignity*, *merit*, and *non-harassment*. While applicable to the specific point of contact between public administrators and the public, it also concerns the treatment of people within the workplace and hiring practices, as seen in the values *non-harassment* and *merit*.

Broadly speaking, while the depth and extent of this value cluster differed across countries, all codes recognized the need for *equality*. Most values in this cluster distributed evenly across the codes of all regions, with the differences appearing to be alternative phrasings of the same ideas, with few other clear patterns emerging.

There were, however, some interesting findings. The ethical code for the African Union stresses numerous *Equal Treatment* values, emphasizing a need for *respecting rights, human dignity, non-discrimination, equity, equality, meritocracy, and democracy*, which subsequently featured prominently in many African ethical codes. While not every African country specifically stated each of these values, all but one of the African ethical codes include the need for *meritocracy*. In fact, *merit* was included much more frequently in the codes outside the West – it appeared in almost every code in Africa and Asia. In comparison, in the West, we only see *merit* included in the code of the United Kingdom. One possible reason for this is that Western countries perhaps enshrine the *meritocracy* value in law, such as equal opportunity legislation, which might not yet have occurred in non-Western countries. If this is the case, these Western countries might not see reason to also include this value in the codes. Another possible reason is that developing countries could have a greater need to focus on *meritocracy* in order to build capacity within the public administration, as was stressed in the African Union code. If greater capacity is a goal, it makes sense to place a clear focus on *equal treatment* within the hiring practices of the workplace. It is possible that *meritocracy* is stressed as a value in countries where nepotism and other forms of favoritism are perhaps more culturally accepted, but the building of capacity seems a more compelling argument based on the stated intentions of the non-Western codes. Curiously, none of the sample countries in Latin America listed *merit* as a value.

Socio-cultural competence was an *Equal Treatment* value only present in the code of Indonesia. One can see the reason for this inclusion, as Indonesia consists of many ethnic groups, languages, and a number of religions. Throughout their code, Indonesia stressed the importance of fostering a public administration that acknowledges and respects this diversity, and works to represent all the people equally. Indonesia builds their public administration upon the concept of *Pancasila*, the official philosophical belief of the Indonesian state. *Pancasila* derives from concepts of *unity, democracy, and social justice*, which fits neatly in with the concept of equal representation in a diverse population. A related value was *inclusiveness*, found only in the codes of Brazil and South Africa. Brazil's code focuses on reforms and earning the trust of the public, and *inclusiveness* helps achieve these goals. Meanwhile, South Africa has a diverse population, much like Indonesia. Following the recent history and consequences of apartheid in South Africa, *inclusiveness* as a value seems logical.

Service

The *Service* cluster values share similarities with those in the *Professionalism* cluster that follows, and both of these clusters contain values advanced by the NPM movement. *Service* values are outward-

facing values aimed at performance toward the public, such as *engagement, courtesy, care, responsiveness, selflessness, promptness, clarity*, and many more.

This cluster features a variety of values related to customer service. Several of these values concern engagement with the public and emotional support, embodied in values such as *engagement, courtesy, care, sympathy, selflessness, modesty, and sense of calling and service*. *Courtesy* is the most common of these values and is seen in codes across all regions. Other values are scattered throughout the codes of countries, but without any clear pattern. The one exception was *selflessness*, seen only in Uganda, Vietnam, and Peru. The second group of values concerns those related to the delivery of services to the customer, including *responsiveness, promptness, speed, quality, innovation, creativity, and clarity*. While *responsiveness* and *creativity* were only present outside the West, *quality, clarity, and promptness* were present in codes all around the world.

In general, the *Service* cluster manifests more clearly in aspirational codes. The aspirational codes included multiple values from this cluster, providing details about how to create a public service that is customer focused. On the other hand, compliance-based codes had fewer details about this value. Many compliance-based codes expressed this value merely as courtesy toward citizens – or, in the case of countries like Bulgaria and Nigeria, to not treat citizens “in a rude, unmannerly, or disrespectful manner” or be “discourteous”. This cluster was almost entirely absent in the Russian code and it was not included in the United States code.

Perhaps the most striking pattern for this cluster is seen when comparing countries like Sweden and Netherlands with Vietnam and Bulgaria. One can sense a stark division in the approach to *Service* values between these countries. Sweden and Netherlands have aspirational ethical codes, focused largely on serving the public and providing courteous care to people, while also stressing *independence* as a value in the work of the public servant. On the other hand, the Bulgarian and Vietnamese codes are much more instructive and rule-based, focusing on detachment from the public while being subservient to the government and hierarchies. Vietnam is the only code stressing *modesty*, and both Vietnam and Bulgaria have codes that include *disinterestedness* as a value. Despite this emotional distance that Vietnam and Bulgaria place between the public administrators and the public, both countries include the value *promptness*, and Vietnam includes details about *politeness* and *clarity*. Social and political cultural attitudes can obviously play a role in a cluster such as *Service*. However, as discussed earlier, history can also explain some of this difference. Sweden and Netherlands come

from an institutional logic that has been relatively free of corruption for a long time compared to Bulgaria and Vietnam. Furthermore, Sweden and the Netherlands have been democracies for centuries, while Bulgaria only recently restored free elections after the fall of the Soviet Union, and Vietnam is a one-party republic. Despite the differences in this value cluster across the sample countries, it seems clear that this cluster is present as a core value.

Professionalism

As mentioned above, the values in the *Professionalism* cluster are similar to those found in the *Service* cluster, often tied to the introduction of NPM. However, unlike outward-facing *Service* values, *Professionalism* values are inward facing, focused on the performance of tasks and efficiency in the workplace. This cluster includes values such as *effectiveness*, *efficiency*, *uniformity*, *punctuality*, *teamwork*, *personal improvement*, *following procedures*, and *proper use of resources*.

Most ethical codes and studies include *effectiveness*, *efficiency*, or both in their lists of core values. However, as widespread as these values are, they are not always equally represented in the ethical codes we examined, particularly in the codes outside the West. The ethical codes of Russia, Bulgaria, and Argentina make no mention of *efficiency*, while the codes of those same countries and United Arab Emirates, Kenya, Sweden, and the United States do not include explicit statements of *effectiveness*. However, the lack of these values does not mean that related values are not included, which leads to our creation of the *Professionalism* cluster, capturing the spirit of both *effectiveness* and *efficiency*.

The idea of a public administration that is professional and can perform its tasks competently and cost effectively is embodied in many other values included in this cluster. In terms of being professional in the workplace and performing tasks well, we have values such as *effectiveness*, *competence*, *specialization*, *performance*, *expertise*, and *accuracy*. Some patterns can be seen in the inclusion of these values. While *effectiveness*, *accuracy* and *expertise* are seen around the world, there appears to be a particular focus on *competence*, *trained*, *uniformity*, *performance*, and *personal improvement* in countries outside the West. We argue that this pattern arises out of historical factors. The majority of these countries including these values in their codes are countries recently developed or still developing, so we are observing a public administration that is working to build capacity and skill. Among the countries that include these values, we see regular inclusion from Vietnam, Indonesia, South Africa, and Tanzania.

Also included in the *Professionalism* cluster is the idea of *efficiency* in the workplace, commonly linked with the *effectiveness* values listed earlier. In addition to *efficiency*, the values that help achieve this goal include *productivity*, *punctuality*, *cost control*, *teamwork*, *proper use of resources*, and *following procedures*. Most codes list *efficiency* and *proper use of resources*. Less common are the ideas of *punctuality*, *teamwork*, and *following procedures*, which appears more commonly in the codes of countries outside the West. Just as with *effectiveness*, we argue that this is likely due to historical factors, and countries stress these values in an attempt to continue building capacity. *Efficiency* values also focus on issues of economy. For developing countries, this is an especially important consideration, so it is unsurprising to see an emphasis on these values in those countries.

Unique Values

In several codes, there were values that do not fit neatly into any of the value clusters, but were noteworthy. *Environmental friendliness* is one such value. Found in the codes of South Africa and Mauritius, this value was surprisingly absent in other codes. However, it comes as little surprise that this value would manifest in these African codes. Africa is arguably the region most likely to experience detrimental consequences of impending climate change, so it would be in the interest of these African countries to push the public service to do what they can to help address this problem. Mauritius places a particular emphasis on this, with environmental values present throughout their entire code. As a small island state, they face a greater threat from climate change than other nations.. Other distinctive values do indeed seem related to the specific cultural environment found in the countries, such as *Batho Pele* in South Africa. Introduced by Nelson Mandela, *Batho Pele* means “people first” and has a community focus not specifically stated in other ethical codes. However, despite the appearance of being a unique value, it really seems to place a focus on working toward the *public interest*, part of the *Integrity* value cluster. The motivation for *Batho Pele* also appears to be the strengthening of *Service* cluster values and helping to address the challenges faced by a developing nation. Despite this, we find that even these values, while motivated by culture, also have quite a lot to do with economic and historical factors.

Harmony and *order* were other interesting values, which only appeared in the ethical code for Brazil. However, the related value *unity* appeared in the codes of Indonesia, South Africa, and Vietnam. These values are only found in the non-Western regions, so can we explain this divide with cultural differences? Perhaps, but not likely. Instead, these values too seem to have much to do with the historical conditions of these countries. In the case of Brazil, it makes sense that values like *harmony*

and *order* would feature in their code. Brazil has faced a history of corruption and their code specifically seems designed to address this challenge. As mentioned earlier, Brazil's code discusses regaining the *public trust* following corruption scandals, and *harmony* and *order* are a part of this strategy. Indonesia and South Africa, due to their historical struggles with diversity, would likely be interested in including a value like *unity*. The one outlier is Vietnam. In that case, the inclusion of *unity* in the code relates to their one-party rule and is clearly due to the specific political history present in the country.

While we do see some other distinctive values in certain codes that seem motivated by culture, these are rather limited in number. A few of these values and policies explicitly stated in codes include sobriety in public (India and Mauritius), a ban on secret societies (Nigeria), and respect for official languages (Canada). However, there were only a handful of these that could be identified. If culture was the driving force behind differences in codes, we could likely expect to see a larger number of these unique values. Instead, it seems these few exceptions help to prove the rule that these codes all share much more in common than they are different.

Analyzing the Differences

While we have attempted to analyze differences in specific core value clusters in the sections above, there are also general patterns worth evaluating. There are clearly differences between countries in their approach to ethical codes and the values included in these.

Let us first address some simple factors that might explain some of the differences in structure and expressed public values across these codes as a whole. Language is one of these possible explanations. Some languages might simply not include all of the value concepts or differentiate as clearly between them. For example, in Swedish, the word *effektiv* expresses both the concepts *effectiveness* or *efficiency*. In the case of the English version of Sweden's ethical code, only one of these (*efficiency*) appears. Similar cases likely exist in other languages and codes. Unfortunately, investigating this potential variable is far beyond the scope of this study. Suffice it to say that language could motivate some differences in the content of these codes.

The style of writing is another factor that leads to significant differences, even within the same regions. Some of the codes are quite short, such as the United Kingdom, which covers everything in four succinct pages. Others stretch on much longer, detailing both extensive lists of values and

guidelines for fulfilling them, such as Brazil. Neither of these extremes is necessarily more advantageous. However, longer codes might spend more time detailing a wide variety of values from each cluster that are important to the public administration when compared with shorter, more condensed codes that focus on only a limited number of core values.

Time could also impact the content of these codes. As other studies have suggested, there appears to be a convergence of the content across these ethical codes over time as global cooperation and the influence of NPM leads to updates and evolutions in the approaches that countries take. The codes used in our study cover a wide span of years, from 2002 to 2016. Some of the codes are originally even older and have gone through multiple revisions since their first drafting, allowing opportunities to identify and address shortcomings or national changes. However, accounting for all of these possible factors over time across codes also goes far beyond the scope of this project.

Same Values, Different Manifestations

Broad patterns are present in the ethical codes. Across these codes, we see striking similarities in the expression of most core value clusters, particularly *Impartiality*, *Legality*, *Reliability*, *Equal Treatment*, *Integrity*, and *Professionalism*. In other clusters, while culture might motivate the expression of certain values, a number of other factors contribute to the differences in values.

One of the most credible explanations for differences in the ethical codes was an interest in building capacity. Many codes outside the West seem guided by a desire to build capacity and enhance the image of the public administration, which in turn affects the values included from each cluster and the emphasis placed on these values. Outside the West, there was a greater emphasis on values that build a strong public administration (*meritocracy*, *competence*, *performance*, *teamwork*, *uniformity*), prevent public servants from reflecting poorly on the public administration (*personal financial responsibility*, *austerity*, *political neutrality*), ensure that they are committed to the job and government (*loyalty to government*, *selflessness*, *personal financial transparency*, *hierarchical subordination*, *stability*), and help the government be economically responsible (*cost control*, *punctuality*). Some of these values were present in Western codes, but a clear pattern emerged in the ethical codes of developing countries.

There is also a contrast between codes that focus on compliance and those that focus on inspiring their public servants. We find the same across the sample we examined. The majority of codes we sampled had compliance-based codes, which were typically written more like legal documents, in-

structuring public servants what they shall and shall not do. Only eight of the sample ethical codes could be classified as inspirational: Mauritius, Brazil, United Arab Emirates, Canada, Netherlands, United Kingdom, and Sweden, with Peru to a lesser degree. While most of these inspirational codes came from countries that are relatively wealthy for their regions, many of which come from the OECD, the compliance-based codes primarily came from Africa, Asia, and post-Soviet countries. As discussed earlier, compliance-based codes are more necessary in countries where the regulatory environments are weak (OECD, 2000). Aspirational codes are perhaps a luxury these countries cannot presently afford. It is only after a strong system of laws and integrity systems are in place that countries can begin to shift to aspirational codes. In addition to regulatory weakness, these countries cannot so easily ignore economic concerns that are less of a problem for public administrations in wealthy nations, and they are much closer to historical challenges they may have faced in the past. All of these factors likely reflect in the values expressed in the codes.

Despite the differences discussed here, these codes share far more in common than they are different. This is consistent with the findings of other studies that focused on more limited samples of the world. Our core value clusters are similar to the eight core values identified in OECD countries: *impartiality, transparency, integrity, legality, equality, justice, responsibility, and efficiency* (OECD, 2000). There is also significant overlap with the findings of the only available study that examined a wide range of countries, Beck Jørgensen & Sørensen (2012): *impartiality, neutrality, transparency, accountability, public interest, legality, regime dignity, political loyalty, and effectiveness*. Similarly, we find that the core values listed by groups such as the EU and the African Union are also similar to our value clusters. Across these samplings of core values, all of our core value clusters are represented.

Conclusion

In moving forward, future studies would continue to sample countries from regions outside the Western world. While our analysis finds both similarities and differences across regions and histories, checking the results against other countries can help ensure that the findings seen here are consistent around the world and within regions. Continued research in the non-Western world can only serve to advance our understanding of these codes.

Similarly, deeper dives into individual codes and laws within countries can help to better understand the differences we have observed between codes. Our analysis focused on only the ethical codes that drive the general public administration. In some cases, more insight comes from detailed looks

at the codes that guide specific agencies. For example, one can see large differences between the codes that drive particular agencies within the United States government. The State Department and Defense Department have very different approaches to how they handle gifts and the perception of bribery, both driven by the individual protocols and etiquette that guide diplomacy versus the negotiation of defense contracts. Across countries and regions, do these departmental differences have any effect on the broader value clusters that guide behavior? There are also likely to be different values expressed in the professional codes of different types of public service jobs. A bureaucrat working within the department that handles licenses for motor vehicles works with a very different environment and clientele than a doctor or teacher. Are the expressed value clusters affected in any significant way across these codes?

Laws are another important factor not analyzed in this study. In many cases, it is possible that laws fill important value gaps found in some of the codes. For example, the American code says little about transparency, despite the fact that the United States has a strong system of guidelines concerning transparency. Laws fill these gaps there, allowing citizens to file Freedom of Information Act requests for virtually any paperwork filed in the government, there is a well-developed e-government presence online that allows people to look into budgets and other logs, and other forms of transparency encoded in laws and practices. For a public administrator entering the public service, can we say that transparency is not a core value within the United States if they are aware of all these laws that guide their behavior – especially with *Legality* being a guiding principle within the ethical code? A better understanding of the legal environment within countries will help explain some of the differences between ethical codes.

A better understanding of these individual cultures can help check whether cultural factors actually do play a role in guiding some of the differences between codes. While our findings suggest that culture plays less of a role in these differences than other important factors, detailed explorations of each moral, social, and political culture was beyond the scope of this study. Checking these factors in more detail can help confirm the patterns and explanations we present in this report.

There is no doubt that political, social, and moral cultures within countries have wide impacts on a society. Aspects of these cultural influences can be seen throughout norms, laws, traditions, and more. But when we look at the ethical codes that guide the public administration in each country, is culture truly the primary influence? We argue that it is not. Instead, there appears to be more sup-

port for the idea that these codes are subject to greater influence from economic conditions, historical factors, existing regulatory structures, and the influence of globalization and NPM strategies.

What we find throughout these codes are consistent patterns of core values that guide all public servants. While these manifest in the codes in a variety of ways, it seems that most societies place a value on impartiality, transparency, integrity, legality, equal treatment, loyalty, reliability, service, and professionalism.

However, our analysis does not tell us whether this has always been the case. While we do not see evidence of this, perhaps these values are new to certain countries. What we can say is that the ethical codes of that guide the public sector around the world appear to be converging on these nine core values.

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Appendix 1: Codes and their location

Country	Year	Title	Length
Argentina	1999	Ethics in the Exercise of the Public Service (translated from Spanish)	10 p.
Brazil	2014	Code of Conduct of the Federal High Administration (translated from Portuguese)	111 p.
Bulgaria	2014	Civil Servants Act	45 p.
Canada	2011	Values and Ethics Code for the Public Sector	14 p.
India	2014	The All India Services (Conduct) Rules, 1968	N/A
Indonesia	2014	Laws of the Indonesian Republic about Civil Service Apparatus (translated from Indonesian)	104 p.
Kenya	2016	The Public Officer Ethics Act	191 p.
Mauritius	2016	Code of Ethics for Public Officers	28 p.
Netherlands	2009	Netherlands Code for Good Public Governance – Principles of proper public administration	49 p.
Nigeria	2008	Public Service Rules	169 p.
Peru	2005	Law No. 27815 – Law of the Code of Ethics of the Public Function (translated from Spanish)	12 p.
Russia	2017	On the State Civil Service of the Russian Federation (translated from Russian)	N/A
Rwanda	2013	Law No86/2013 of 11/09/2013 Establishing the General Statutes for Public Service	67 p.
South Africa	2016	Public Service Regulations, 2016	152 p.
Sweden	Sometime between 2009-2012	An Introduction to Shared Values for Civil Servants	24 p.
Tanzania	2005 (I think...date is hard to find)	Code of Ethics and Conduct for the Public Service	16 p.
Uganda	2005	The Code of Conduct and Ethics for Uganda Public Service	
Ukraine	2015	Law of Ukraine – On Civil Service	60 p.
United Arab Emirates	2010	Code of Ethics and Professional Conduct	24 p.
United Kingdom	2015	The Civil Service Code	4 p.
United States	2017	Standards of Ethical Conduct for Employees of the Executive Branch	90 p.
Vietnam	2010	Law on Cadres and Civil Servants	24 p.

Location

Argentina: <http://servicios.infoleg.gob.ar/infolegInternet/anexos/60000-64999/60847/texact.htm>

Brazil: <http://etica.planalto.gov.br/sobre-a-cep/legislacao/codigo-conduta-compilado-2014.pdf>

Bulgaria: <https://www.mi.government.bg/en/library/civil-servants-act-381-c25-m258-1.html>

Canada: <https://www.tbs-sct.gc.ca/pol-cont/25049-eng.pdf>

India: [http://www.referencer.in/CS_Regulations/AIS\(Conduct\)Rules1968/Default.aspx](http://www.referencer.in/CS_Regulations/AIS(Conduct)Rules1968/Default.aspx)

Indonesia: <https://luk.staff.ugm.ac.id/atur/UU5-2014AparaturSipilNegara.pdf>

Kenya:

kenya-law.org/lex/rest/db/kenyalex/Kenya/Legislation/English/Acts%20and%20Regulations/P/Public%20Officer%20Ethics%20Act%20Cap.%20183%20-%20No.%204%20of%202003/docs/PublicOfficerEthicsAct4of2003.pdf

Mauritius: <http://statsmauritius.govmu.org/English/AboutUs/Documents/CodeofEthics-2016.pdf>

Netherlands:

http://www.integriteitoverheid.nl/fileadmin/BIOS/data/Internationaal/Netherlands_Code_for_Good_Public_Governance.pdf

Nigeria: <https://www.nama.gov.ng/PublicServiceRules.pdf>

Peru: http://www.unmsm.edu.pe/archivos/NORMAS_ETICA_FUNCION_PUBLICA.pdf

Russia: https://legalacts.ru/doc/79_FZ-o-gosudarstvennoj-grazhdanskoj-sluzhbe/

Ruanda: http://www.mifotra.gov.rw/fileadmin/user_upload/Laws/Sitati_nshya.pdf

South

Africa:

<http://www.dpsa.gov.za/dpsa2g/documents/acts®ulations/regulations2016/Government%20Gazette%2029%20July%202016.pdf>

Sweden: <https://www.his.se/PageFiles/3429/Shared%20Values%20for%20Civil%20Servants.pdf>

Tanzania: <http://workspace.unpan.org/sites/Internet/Documents/UNPAN038468.pdf>

Uganda:

<https://www.publicservice.go.ug/sites/default/files/Publications/Public%20Service%20Code%20of%20Conduct.pdf>

Ukraine: www.center.gov.ua/en/press-center/blog/item/download/545_0821b8518898627786a8e9e7f5036425

United Arab Emirates: https://www.fahr.gov.ae/Portal/content/documents/Code_of_Ethics.pdf

United Kingdom: <https://www.gov.uk/government/publications/civil-service-code/the-civil-service-code>

United States: [https://www.oge.gov/Web/oge.nsf/0/076ABBBFC3B026A785257F14006929A2/\\$FILE/SOC%20as%20of%2081%20FR%2081641%20FINAL.pdf](https://www.oge.gov/Web/oge.nsf/0/076ABBBFC3B026A785257F14006929A2/$FILE/SOC%20as%20of%2081%20FR%2081641%20FINAL.pdf)

Vietnam: <http://www.ilo.org/dyn/natlex/docs/ELECTRONIC/82230/93677/F1786327314/VNM82230%20II.pdf>