Codes of Good Governance:

National or International Public Value Discourse?

Torben Beck Jørgensen  
&  
Ditte-Lene Sørensen

University of Copenhagen

Paper to be presented at the EGPA Study Group on  
ETHICS AND INTEGRITY OF GOVERNANCE,  
September, 2010, Toulouse
1. Introduction

Codes of conduct have been used far back in history as an instrument for socialising of norms and values, whether of religious, professional or civic character. Notable examples are the Ten Commandments, the Hippocratic Oath and Pericles’ Athenian code. The widespread use of codes in the public sector is a relatively new phenomenon. Up to mid 1990’ies codes were mostly to be found in states with an Anglo-American political-administrative tradition, but now codes seem to be used in states all over the world. Codes can be found for specific public organisations and for specific professions. To an increasing degree codes seem to focus on the proper role of the state and the public sector as such. These codes we refer to as codes of good governance.

Codes of good governance usually express general expectations on which values to be followed in the public sector. Consequently, it is likely that codes of good governance express or mirror aspects of a political culture and the normative foundation of the public sector. Given the widespread use of codes it is of interest to explore similarities and differences between codes. In this paper we will analyse a broad sample of codes from various countries. Time and space, however, restrict us from going into details of the single code and of the country it represents. The code as a text is in focus.

Our research questions are:

What kind of normative conceptions regarding the public sector’s role in society and the behaviour of its civil servants are displayed in codes of good governance?

Are codes of good governance so identical that they most likely reflect an international discourse on appropriate public sector values or do variations between codes suggest that they reflect unique national public value discourses?

2. Background and hypotheses

There is no easy way to register when and where codes of good governance have been drafted. Most countries within OECD have adopted a code (OECD, 2000, 2008) but for the rest of the world
difficulties arise. Consequently, our claim that codes are used all over the world cannot be sufficiently substantiated. However, if the number of scientific articles written in a period indicates not only an academic interest in codes but also the growth (or decline) in the phenomenon itself, we can get a hint about the diffusion of codes.

Table 1 shows a significant rise in numbers of articles (simple search on the phrase ethic* code*) published the last 20 years, particularly after 1998.

Roughly, the same pattern is found when the search is limited with the word public (see table 2). Three observations can be made: 1) there is a rising interest for ethical questions beginning early 1970ies, 2) a growing (but apparently delayed) interest for these matters specifically in the public sector beginning in the early 1990ies, and 3) a possible decline, at least in the academic interest.

Several events might explain the rising interest. USA as the first state introduced a code for higher civil servants shortly after the Watergate-scandal in 1973-74 and in general a rising interest in ethical problems in the public sector followed (Dwivedi & Kernaghan, 1983). The fall of the Iron Curtain in 1989 and the following possible inclusion of former Sovjet republics in the EU triggered the Copenhagen Criteria: newcomers should demonstrate institutional stability guaranteeing democracy, the rule of law, human rights and respect and protection of minorities. Fraud and corruption in the EU caused the resign of the Santer Commission and an increased focus on accountability measures (Martinsen & Beck Jørgensen, 2010). Finally, international organisations such as UN and OECD have issued codes of conduct.

Although these events at least partly may explain the a more widespread use of codes of good governance it does not follow that the drafted codes are similar. Many peculiar contexts – local,
national or regional -may influence the content of a national code. Given this background we will explore the following hypotheses:

H1: *Codes of good governance express a globalised discourse of what good governance means.*

This hypothesis is supported if we can identify very similar value statements in the various codes. Two explanations can be offered:

- **Codes are heavily influenced by a good governance *fashion***. This explanation suggests or presupposes that codes are written by national actors only loosely coupled to national segments but part of and seeking legitimation in a wider international community which is capable of issuing formal or informal norms and values of good governance (cf. theories of isomorphism within sociological institutionalism).
- **Codes are *rational answers to the same problem***, e.g. corruption. This instrumental explanation suggests or presupposes that there is such a problem everywhere or that actors drafting codes believe so.

If the first explanation is valid, it is likely that codes of good governance do not reflect national differences with regard to political culture and the normative foundation of the public sector. Because of lacking adaptation to national peculiarities it is expected that codes of good governance only to a limited extent influence national behaviour. A considerable gap between international trends and actual practices within states can thus be expected as Pollitt (2001) pointed out with regard to New Public Management.

H2: *Codes of good governance vary considerably because they reflect different national conceptions of good governance.*

This hypothesis is supported if each code of good governance differs in value statements and thus can be said to have its own identity. Again, two explanations can be offered:
Each country presents a *solitary case of culture and political and societal development* institutionalised through history (cf. historic institutionalism). The code is written to reflect such a solitary identity.

- The code addresses the *situations and problems considered serious in each country* and present norms and values likely to improve the matter. In particular, codes may be used as strategic instruments for *handling external contingences*.

If H2 is valid, it is likely that codes of good governance do influence national behaviour.

Besides analysing the normative conceptions in the codes, the present analysis is basically limited to substantiate either H1 or H2 as our data only consists of the codes themselves. However, in the final discussion of similarities and differences we will address the mentioned possible explanations.

3. **Codes – the meaning of the concept and how we study the phenomenon**

Codes are often referred to as codes of conduct or ethical codes. Codes express a vision of excellence, giving ideals and values to strive for and situations to be avoided (Gilman, 2005). Like taking an oath (Rutgers, 2009), these ideals and values are expected to refer to matters above the individual’s private life, to behaviour in one’s official capacity. As mentioned by Lewis (2005, 4):

> “The power of people in public service compared to those they serve is behind the idea that “public service is a public trust” and explains why so many governmental and professional codes impose special obligations on public servants who, as *temporary stewards*, exercise public power and authority. Their position is neither theirs to own, nor is it theirs to keep.”

A code is usually understood as a collection of rules and principles expected to be followed by a certain group of people (e.g. public servants, teachers, police officers, members of a political body etc.). Contrasted to legal rules, codes do not specify very detailed rules and though related sanctions can be mentioned, it is not the core of a code. In Pericles’ apt phrasing codes are referring to proper conduct which “can not be broken without acknowledged disgrace.” (Thucydides, Book II, Chapter
On the other hand, codes usually present a coherent picture of expected behaviour that is more detailed than single phrases such as “Righteousness exalts a nation” (Proverbs 14:34). Code-writers therefore face the challenge of balancing as indicated in the first Report from the Nolan Committee (1995, 38):

“We share the view of those who warn against unduly detailed and prescriptive rules, but we also consider that it is unreasonable to expect that the view of every Member of Parliament of what is and is not acceptable will produce without guidance a universally acceptable standard.”

If a code is fairly detailed it is labelled as a compliance-based code (examples are The Justinian Code and The US Management Code) in contrast to the less detailed code which is labelled as an integrity-based code (examples are the seven principles of the Nolan Committee and the twelve principles of OECD).¹

When analysing similarities and differences between codes we address three important dimensions:

Values: We operationalise the content of a code as values. This is the key focus of our study and the central question is: which values can we identify in a code of good governance? By simply counting their appearance in the same code and acknowledging how they are expressed and related to other values we rank the importance of each value in each code combining a quantitative measurement of value expressions with a qualitative reading. We also ask whether the identified values seem to form or at least be part of a general model of public administration such as the Weberian model and – as a contrast – the New Public Management model.

As values are very abstract creatures and can be interpreted very differently because of varying local or actual circumstances, we need also to look at context and style of the codes.

Context: Codes are presumably created in a context. One the one hand, they may reflect a specific political culture, a general societal development or a fashion and on the other they can be created as an instrument that is regarded as a solution to a specific problem. It is of interest to identify the

¹ For description of codes, see also Kernaghan (1980), Lawton (2001) and OECD (1996).
specific context that might have motivated the drafting of a code. Are specific purposes mentioned? What problems is a code supposed to solve? Or is the particular code “context-free”? Answers to these questions will help us to locate a code in a globalised or national discourse. However, we rely only reluctantly on such answers as a context might have been specified elsewhere (e.g. in other documents or in a public debate) rather than in the code itself.

**Style:** Codes may vary in style. They can be written in a legalistic language or they can address the ordinary citizen in the street by using a straightforward spoken language. They can be illustrated by colour pictures or drafted on modest office paper. They can use fact boxes, highlight core values or principles or leave it to the reader to find the nuances and the core values – if any. The style can give us a hint about the seriousness as well as the purpose of a code. A very legalistic and specific code with reference to sanctions – a compliance-based code – may tell us about a legalistic culture and/or actual integrity problems. In contrast, a short code with few general principles and values – an integrity code - may point to a political culture with few problems. Or tell us about a code drafted as window dressing.

4. Methodology

Our empirical analysis is based on a selection of 16 codes of good governance. The idea behind case selection has primarily been the maximisation of variation. Thus, an identified similarity despite national variations is a strong indicator of an internationalised discourse on public values. Given our interest in similarities and variations, we have strategically chosen codes from countries belonging to different political-administrative traditions and regions.

Following a usual grouping of countries (see e.g. Kickert, 2005), we have chosen codes from Southern Europe (Italy and Spain), the Nordic Region (Denmark and Norway), East Europe (the former communist states Estonia, Poland and Romania), and the Anglo-Saxon countries (Canada, New Zealand and UK). Further, we have included three countries which each represents a unique tradition and background: Korea (the Far East), South Africa (with its own distinctive political development) and Turkey (on the border between Islamic and Christian countries). On top, we selected two “model codes”, respectively issued by United Nations and the European Council. The
two “model codes” are chosen in order to investigate whether they have functioned as an inspirational source in such an internationalised discourse. The selected codes are presented in appendix 1.

First and foremost we are interested in identifying which values are mentioned in the codes and their relative importance. For that purpose we need a clue of what values might be relevant and ideas on how to index value importance. We take our point of departure in the Beck Jørgensen & Bozeman Public Value Inventory because we not only find a list of values identified in the research literature but also a typology of public values in major constellations (see figure 1).

The major constellations and their sub groupings are shown in table 3.

The codes were analysed in the following way: first, the above model was tested on the codes to see whether the model would grasp the whole value universe in the selected codes of conduct. Second, a double coding (which values are mentioned and how many times) was performed with all values in the inventory as a point of departure. This quantitative reading was followed by a qualitative reading of all codes with two purposes: a) identifying the style and context of each code and identifying value-statements communicated indirectly, b) identifying the relative importance of mentioned values by analysing their relational properties, i.e. proximity (neighbouring values), hierarchy (prime and instrumental values) and causality (co-values), see Beck Jørgensen & Bozeman (2007: 369-373). Finally, the importance of a given value in a given code was indexed.

This procedure is not without methodological problems. Firstly, values are very intangible phenomena and therefore difficult to identify and measure. Secondly, values are contextual because the same value can be interpreted quite differently in different countries. As we study values in codes from countries all over the world, these problems can not be avoided. We try to minimize
methodological problems by being very specific in the coding, especially in the quantitative analysis. One author did a double coding of all values in all codes, later to be checked by the other author. This procedure revealed a few disagreements and a somewhat larger set of legitimate variations in interpretation. Next, we have lowered our ambitions in the sense that we limit ourselves to study value expressions as they appear in codes, not as they might be expressed in their homeland. See appendix 2 for a more detailed outline of methodological problems.

5. Results

An overview

Table 4 gives us an important insight in which value constellations are considered most important in codes of good governance based on the quantitative analysis. In each code values related to public employees (constellation 6) are considered most important. This is hardly a surprise, given the selected codes are supposed to guide employee behaviour. But it emphasizes the importance of employee behaviour as a key to good governance. Note also that values related to the relationship between the administration and citizens or users (constellation 7) is the second or third most important category in 13 codes and that 14 codes emphasize either the contribution of the public sector to society (constellation 1) or the relationship between the administration and its immediate surroundings (constellation 4) as the second or the third most important category.

In sum, what is considered important is public employees and their relations to the public sector’s environment whatever coined as society, citizens/users or immediate surroundings. Little emphasis is on how societal interests are converted to political-administrative decisions (constellation 2) or on the relationship between politicians and the administration (constellation 3). Although there are differences between countries these appear to be rather modest. Good governance world wide seems to be preoccupied with the implementation or the practice in the public sector.
Following the Beck Jørgensen & Bozeman scheme (2007: 360-361), the next step is the analysis of the importance of subgroups of values within the single constellation. When combining the quantitative analysis with the qualitative reading of the codes and the analysis of relations between values, we get the following picture (shown in table 5):

As easily can be seen, the most important subgroups of values are:

- Accountability
- Rule of law
- Neutrality
- Openness
- Public interest
- Robustness
- Effectiveness

In the following subsections, we present examples of characteristic public value expressions from each value constellation.

**Constellation 1: Public Sector’s Contribution to Society**

Two values appear as nodal values: *The public interest* and *regime dignity*. Quite a number of other values in the codes are related to public interest. For example, impartiality, innovation, effectiveness, transparency, altruism, democracy and legality are mentioned as instrumental values to public interest as a prime value and often public interest is coined as the top value in a value hierarchy, as for example in the Spanish and the South African codes:

“Decision-taking shall always seek to satisfy the general interests of citizens and shall be based on objective considerations focused on the common interest, regardless of any other factor implying personal, family, corporate, client-based positions or any others which might collide with
this principle.” (Spain)

”An employee – [...] puts the public interest first in the execution of his or her duties.” (South Africa)

The sincerity of the public interest is sharpened in the Estonian code:

“An official shall be prepared to make unpopular decisions in the public interest.” (Estonia)

Regime dignity is linked to values such as reliability, trust, integrity, impartiality, democracy, ethical consciousness, legality and transparency. As stated briefly and boldly in the Introduction to the New Zealand code:

“The strength of any government system lies in the extent to which it deserves and holds the respect of its citizens” (New Zealand).

Thus, a central part of regime dignity concerns the image of the public sector or the state as is made clear in the following codes from New Zealand, Norway and Romania:

“Public servants should not bring the public service into disrepute through their private activities.” (New Zealand)

“The individual employee is required to perform his or her duties and behave in an ethical manner, and thus avoid damaging the State's reputation.” (Norway)

“The civil servants that represent the public authority or institution at international organizations, education institutions, conferences, seminars and other activities shall promote an image favourable to Romania and to the public authority or institution they represent.” (Romania)

Constellation 2: Transformation of interests to decisions
As already shown this constellation is only weakly represented in the codes. But when referred to, democracy is clearly the favourite. In the Canadian code democracy is put up front:
“The Public Service of Canada is an important national institution, part of the essential framework of Canadian parliamentary democracy. Through the support they provide to the duly constituted government, public servants contribute in a fundamental way to good government, to democracy and to Canadian society.” (Canada)

Public administration and public employees are in the same way related to democracy in the preamble of the code from the European Council:

“Considering that public administrations play an essential role in democratic societies and that they must have at their disposal suitable personnel to carry out properly the tasks which are assigned to them.” (European Council)

**Constellation 3: Relationship between administrators and politicians**

From these examples there is only a short way to go to the constellation 3. Political loyalty is closely related to democracy, neutrality, legality and impartiality. The Danish code for chief executives underscores loyalty in this way:

“It is your responsibility to ensure that the management and staff of the organisation are aware of and understand the political goals and intentions, and that they pursue these goals.” (Denmark)

The Norwegian code adds the shifting political circumstances:

“Civil servants should also acknowledge that they must be capable to work under changing political regimes.” (Norway).

The New Zealand code agrees and implicitly makes it clear that despite conflicting demands of loyalty the minister is the most important person:

“Public servants ... are as much servants of democracy as they are of the government of the day or their fellow citizens” followed by this clear principle: “Public servants are obliged to serve the aims and objectives of the Minister.” (New Zealand)
Constellation 4: Relationship between administrators and their immediate surroundings

Constellation 4 is quite important and includes three nodal values: Openness (or transparency), impartiality and neutrality. Openness is mentioned with other values such as legality, responsiveness, regime dignity and public insight and thus occurs with quite different meanings. Openness refers ultimately to (active) accept of external critique as we find it in the Norwegian code:

The principles of transparency and the citizenry's scrutiny of the public service require that the general public has insight into circumstances worthy of criticism in the public service. In some cases, this means that public officials must be able to give the general public factual information about matters involving wrongdoing." (Norway)

As is obvious, openness in this sense is also linked to legality. Openness understood as being responsive is a far less popular guest in the codes. In fact, listening to the public opinion is only briefly mentioned in two codes.

Impartiality and neutrality are standard values in codes for good governance, and often the two values seem to appear as synonyms (despite they are not identical). With one exception - the Danish code for chief executives - one of the two or the two together are mentioned in all codes. Impartiality (or neutrality) can be mentioned specifically as in the European Council code:

The public official should act in a politically neutral manner." (European Council)

Or mixed up with other values, as in the Italian code:

“The principles and contents of the present code constitute exemplary specifications of the requirements of diligence, faithfulness and impartiality that characterize the correct performance of the employee’s work obligations.” (Italy)

The opposite poles to openness and impartiality/neutrality – respectively secrecy and advocacy – are rarely mentioned despite the fact that secrecy is an important part of the “rechtstaat” (e.g. avoiding improper access to cases concerning individual citizens), that all states handle information
of confidential nature, and that many public organisations - if not all - are established with the purpose of defending and enhancing certain values and policy purposes.

**Constellation 5: Intraorganisational aspects of public administration**
Constellation 5 has four subgroups. The subgroup on economy is mentioned in all codes. Note that not only is effectiveness considered more important than productivity, a business-like approach and parsimony; also the meaning of effectiveness is very broad and only a few instances linked to the modern business-like approach to economy. A proper and accountable use of public money and property is mostly asked for.

The following examples from Italy, Canada, Estonia, United Nations and Norway illustrate the variety of interpretations of economy values, beginning with a short and narrow version, adding then “proper”, “prudent”, and “integrity” and closing with a direct call for a balance between economy values and other values. It also illustrates that in most cases economy is not left alone:

”... he/she undertakes to carry these tasks out in the simplest and most efficient manner possible ...

” (Italy)

“Public servants shall endeavour to ensure the proper, effective and efficient use of public money.”
(Canada)

”An official shall treat property entrusted to him or her economically, expeditiously and prudently.”
(Estonia)

“Public officials shall ensure that they perform their duties and functions efficiently, effectively and with integrity, in accordance with laws or administrative policies.”
(UN)

“Public officials are required to use and preserve the State's resources in the most economical and rational manner possible, and shall not abuse or waste the State's funds. Reaching the established targets in a good and efficient manner requires striking a balance between efficiency and the use of resources, thoroughness, quality and good administrative practice.”
(Norway)

However, the Italian code is not that focussed on a narrow efficiency conception as one may think, because the sentence quoted continues: “... in the interests of the citizens and assumes the
responsibility related to his/her duties. The employee shall exercise due care in the use and custody of the goods at his/her disposal for official purposes and shall not use for private ends the information available to him/her for official purposes.” (Italy)

It is interesting to see how closely related economy values are linked to avoidance of corruption. This is a quite general feature: The context of economy values is corruption rather than micro economic rationality. The Romanian code is – among many others – very clear on this point:

“Civil servants shall use office time and the goods belonging to the respective public authority or institution just for carrying out activities specific to the public position held.” (Romania)

This takes us directly to two other nodal values in this constellation: robustness and reliability. Both are important instrumental values that relate to a number of other values such as effectiveness, legality, integrity and impartiality. An example of robustness and efficiency as co-values is given in the Danish code for chief executives:

“It is your responsibility to ensure that the choices made and initiatives pursued in connection with organisational development and change are robust and make a genuine and constructive contribution to the organisation’s efficiency and the execution of its tasks.” (Denmark)

Although reliability is rarely mentioned directly this value is often presented indirectly when linked to confidence, integrity or trust as shown in these examples from Great Britain, Canada and the European Council:

“You must […] act in a way which deserves and retains the confidence of Ministers.” (Great Britain)

“Ministers are responsible for preserving public confidence in the integrity of management and operations within their department”. (Canada)
“The public official has a duty always to conduct himself or herself in a way that the public’s confidence and trust in the integrity, impartiality and effectiveness of the public service are preserved and enhanced.” (European Council)

The latter principle from the European Council is at the same time an example of how values can be assumed to co-vary: Reliability ensures trust and confidence and if trust and confidence are low it is difficult to act with integrity, impartiality and effectiveness.

The importance of robustness and reliability (and of accountability and integrity) tend to rule out innovation, enthusiasm and willingness to take risks. These values can be identified only in four codes. The Canadian mentions innovation in a rather soft tone as renewal:

“Public servants should constantly renew their commitment to serve Canadians by continually improving the quality of service, by adapting to changing needs through innovation.” (Canada)

Whereas South Africa puts it more boldly as creativity and innovation:

“An employee [...] is creative in thought and in the execution of his or her duties and seeks innovative ways to solve problems and enhances effectiveness / and efficiency within the context of the law;” (South Africa)

But in general, the balance between predictability (robustness, reliability etc.) and unpredictability (innovation, risk taking etc.) clearly is tipped in favour of predictability.

**Constellation 6: Public employees**

The sixth constellation is the constellation most often addressed. All values in this constellation – accountability, professionalism, honesty, moral standards, ethical consciousness, and integrity – are with rare exceptions mentioned in all codes. Key values are here accountability and integrity. These two values got the highest score and are mentioned in all codes with only one exception.

It is no surprise that accountability is a popular value. Accountability is an “open” value that may fit into many contexts and can carry many meanings. You are accountable, if you are open to public
scrutiny, if you do not commit mistakes, if you do not let political considerations interfere with professional standards, if you avoid conflicts of interest, if you react to unethical behaviour, if you respect principles of confidentiality etc. At the same time you must also be accountable to your minister and the public.

Like accountability, integrity is used in many different context but conflicts with other values are emphasized more directly. Integrity can be phrased as professional integrity – i.e. never letting irrelevant considerations influence your decisions. For example, a public employee in South Africa:

“... does not unfairly discriminate against any member of the public on account of race, gender, ethnic or social origin, colour, sexual orientation, age, disability, religion, political persuasion, conscience, belief, culture or language.” (South Africa)

Integrity can be coined as economic integrity, i.e. never letting economic interests influence your work. This is a key point in many codes. In particular, the Korean code spends a number of rather detailed paragraphs on economic integrity:

“A public official shall not receive money, valuables, real estate, gifts or entertainment (hereinafter referred to as “money and other articles”) ...” “A public official shall not borrow money or rent a real estate from a duty-related person (excluding a relative within the third degree) ...” “ A public official shall not give or take money and other articles for congratulations and condolences that exceed the standards, which the head of a central administrative agency has set within the scope of general conventions, in consideration of ordinary custom after hearing the opinion of employees.” (Korea)

Finally, integrity can be understood as political integrity, meaning that the public employee is not influenced by any political affiliations. The Polish code is very restrictive here, when it states that he/she:

“... shall not manifest their political opinions and sympathies, and if he/she is a civil servant, he/she shall not arrange and belong to a political party.”
“... shall openly keep their distance from any political influence or pressure that might lead to partiality in action and shall not engage in activities that could serve party purposes.” (Poland)

Constellation 7: Relationship between public administration and citizen
The last constellation consists of four subgroups of values: a judicial oriented category with roots in the classic “rechtstaat”, professionalism that reflects the modern state with all its experts, dialogue with an emphasis on participation and citizen involvement, and user orientation with New Public Management inspired customer identification. The first, judicial oriented subgroup is with little doubt the most important. The citizen has rights, shall be protected by the rule of law and any unfair preferential treatment shall be avoided. The Italian code is short and clear on this:

“... the employee shall ensure equal treatment of the citizens ...” (Italy)

And also quite specific:

“In handling cases he/she shall observe their chronological order and shall not refuse to perform actions that it is his/her duty to perform by citing generic motivations such as the amount of work to be done or lack of time.” (Italy)

6. National or international discourse on public values?

Modernity, constitutionalism (and Max Weber) as a global trend
When summing up there seems to be little doubt that a number of specific public values can labelled as if not universal values then as global values in codes of good governance:²

- Public interest, regime dignity,
- Political loyalty,
- Transparency, neutrality, impartiality,
- Effectiveness,

² Much the same values were found in an investigation of principles and values for public servants in Central and East European countries. See Palidauskaite & Lawton (2004)
• Accountability and
• Legality.

These values have been mentioned numerous times. Further, quantitative and qualitative analyses combined reveal that only in seven instances (in four codes) one of these core values has not been included. Examples are transparency in the Korean code and political loyalty in the Italian code.

All in all, it strongly points to the ideals of modernity, the constitutional state, and perhaps also to the Weberian model of bureaucracy with its conception of rational-legal authority as a favoured ideal. It is also noteworthy what is left out of the codes. There are very few references to ideals about citizen involvement and participation; the modern complex state with all its experts are rarely reflected; markets, public-private partnerships, contracting out, networks and multilevel governance are obsolete; and New Public Management plays a role as a left behind actor on the backstage.

Why do we find a set of globalized public values? And one could add: why these old-fashioned ideals? Why these outdated values? Why is it necessary to be so damned “classic”? There are several possible answers to that.3

First, international cooperation on state building and administrative reform has increased significantly in the last decades, partly through organisations such as OECD, UN, the World Bank, EU etc. Thus, certain norms of good governance can easily be spread all over the world.

Second, bringing good old reliable bureaucracy back in has been trendy for some years, see for example Goodsell (1994) and Olsen (2006), and this trend is likely to be reflected in codes of good governance. Where else? Codes of good governance are perhaps exactly reactions to modern too-smart fashions like citizen involvement, NPM etc. Indeed, these codes may be an element in bureaucratic politics between fans of decency and classic virtues on the one side and fans of performance related pay and outsourcing on the other: a reply in an ever going battle between legality and efficiency?

3 Admittedly, the saliency of certain values may to some extent be a result of the method. One should recall that the selected codes are not codes for doctors, university professors, social workers, railway personnel, or managers of museums, day care institutions and public hospitals. They are either rather general codes for the public sector as such or codes for employees in more classic parts of public administration.
A third type of answer can be found if we focus on what kind of problems these codes are supposed to be the solution to. One widely acknowledged problem is corruption. Some of the country codes such as the Italian code address corruption directly and corruption clearly forms the context of the two models codes - The UN code and the European Council code. The latter states boldly:

“Convinced that corruption represents a serious threat to the rule of law, democracy, human rights, equity and social justice, that it hinders economic development and endangers the stability of democratic institutions and the moral foundations of society;” (European Council)

The UN code is very specific on pointing to corruption as the main problem:

“... Concerned at the seriousness of problems posed by corruption, which may endanger the stability and security of societies, undermine the values of democracy and morality and jeopardize social, economic and political development,

Also concerned about the links between corruption and other forms of crime, in particular organized crime and economic crime, including money-laundering,

Convinced that, since corruption is a phenomenon that currently crosses national borders and affects all societies and economies, international cooperation to prevent and control it is essential,”

If corruption is considered a world wide problem it is perhaps no surprise that codes from all over the world present the same type of remedy.

**Bringing national variation back in**

Apparently, the codes converge with regard to values and preferred organisational model. But not entirely. If we re-categorise our codes in groups of countries with the same administrative tradition we can find some systematic variation.
From table 6 we can point to a few interesting differences. First, the Scandinavian group is characterised by stronger focus on dialogue, user orientation and self development of employees. One of the Danish codes exemplifies a Scandinavian or at least Danish/Norwegian relaxed laid back spirit:

“The daily work in public organisations is normally marked by an open dialogue and informal working relations, and the tasks are typically solved by managers and employees together after common discussion of various points of view.” (Denmark 2)

Sentences like the above can not be found in codes from southern Europe – possibly reflecting that corruption is not a serious problem in Northern Europe and differences in political culture.

Second, the Anglo-Saxon countries have a notable weight on political loyalty, neutrality and impartiality in contrast to especially the Southern European countries.

Third, it is remarkable that the codes from the three East European countries are quite similar to the Scandinavian and Anglo-Saxon groups with regard to classic values such as public interest, regime dignity, political loyalty, neutrality and impartiality, accountability and legality. An explanation can be that the codes were drafted during their transformation from former communist states to members of the European Union.

Fourth, the political history may also play a role and thus account for differences. The Romanian and especially the Polish codes are very restrictive with regard to civil servants’ political activities; and we find reminiscences of South African history of apartheid when her code specifies that an employee:
“… promotes the unity and well-being of the South African nation …” and “… deals fairly, professionally and equitably with other employees, irrespective of race, gender, ethnic or social origin … etc.”

So far, the conclusion is that varying aspects of context do matter and cause notable differences in the drafting of codes. Further, beneath the quite abstract level of values we find huge differences in style. If we put the codes on the table and take a short look at them, there are only few similarities. The length varies. Codes range from e.g. the Canadian Value and Ethics Code (43 pages, illustrated) to e.g. the Estonian Public Service Code of Ethics (1¼ page with 20 very brief sentences). The Canadian and the New Zealand codes are written in plain English in an essayistic style while the Italian code among others is quite legalistic and here and there very specific (recall from the Italian code: “In handling cases he/she shall observe their chronological order”). The Korean code focuses strongly on gifts, mentions congratulations and condolences and refers to religious organisations and friendly societies etc., thereby reflecting a civil culture and organisation that hardly is Northern European. One may say that although the single code displays ideals from modernity, constitutionalism and rational bureaucracy, these ideals to some extent are translated or edited into a national culture.

7. Conclusion

In 16 codes of good governance we identified a set of apparently global public values: Public interest, regime dignity, political loyalty, transparency, neutrality, impartiality, effectiveness, accountability and legality, reflecting ideals from modernity, constitutionalism and rational bureaucracy. Consequently, we may have identified a global discourse on what good governance means. We have suggested three possible explanations: the increased international cooperation on matters of state building and administrative reform, the regained popularity of Weberian bureaucracy, and the acknowledgement of the danger of corruption.

However, behind the abstract level of public values variations in content, context and style can be found. The political history (e.g. apartheid in South Africa), specific strategic challenges (e.g. transformation from communism to member state of the EU) and national political cultures (e.g.
laid back culture in non-corrupt states such as Norway and Denmark; civil culture and organisation in Korea) can explain differences between codes of good governance.
References


## Appendix 1. The selected codes of good governance

<table>
<thead>
<tr>
<th>Country</th>
<th>Code</th>
<th>Year</th>
<th>Code title</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Estonia</td>
<td>EST</td>
<td>1999</td>
<td>Public Service Code of Ethics</td>
<td><a href="http://www.avalikteenistus.ee/?id=10921">http://www.avalikteenistus.ee/?id=10921</a></td>
</tr>
</tbody>
</table>
Appendix 2. Methodology

The subject of the study is the outspoken values in the codes. There may exist institutional values which are not expressed in the codes and not all values in a code may be reflected in action.

A major issue – given the focus on the discursive level – of a quantitative content-analysis is to secure reliability of the analysis, which is challenged e.g. from the lack of context and the researchers preconception. In this study we have taken the following steps the secure the reliability of the coding- and analysis process:

Table 7. The methodological steps of the quantitative content analysis. Inspired by Bergström & Boréus, 2005, chapter 3

First, the model used in the analysis of codes is based on value-theory and empirical research. Second, the model was tested on a test-code of conduct first in order to see if the model could grasp the whole value universe expressed in the codes. Third, a double-coding was performed by one author with a time span in between. Then the codings were compared with focus on the value profiles. There was no significant difference between the two codings. Fourth, the other author controlled all codings. A few disagreements were settled and the codings changed slightly.

The coding rules were the following:

A value is considered to be present in a code if one of the following is true:

- The value X (e.g. professionalism) is mentioned directly
- Synonyms are mentioned (expert)
- Aspects of X (merit, evidence, objectivity) is mentioned
- Activities that leads to X (professional training) is mentioned
- Prerequisites to obtain X is mentioned (independence of …)
- A definition of X is mentioned
- If the purpose of the code is X

In a number of cases, a specified interpretation is necessary:

*Balancing of interests*: balancing of various considerations  
*Neutrality/impartiality*: Often used interchangeably in codes  
*Robustness, accountability, reliability*: Often used interchangeably in codes. Especially accountability is a very broad value (e.g. discipline, dedication, reporting about the errors of others, correcting own misbehavior, reporting about danger of conflict of interest, reporting about own financial circumstances, acting in accordance with … etc.)  
*Business-like approach*: Interpreted generously. The appearance of the value in codes may be exaggerated  
*Professionalism*: Two interpretations have been used; a) acting on the basis of expert/scientific knowledge, b) acting without any regard to irrelevant circumstances, e.g. own feelings. Coding is
based on words like skills, professionalism, evidence, merit, facts, objectivity, avoidance of own viewpoints etc.

Moral standards, ethical consciousness: Tend to be used interchangeably in codes

Integrity: Can be difficult to separate from moral standards. Often standards lead to integrity (co-values).

Legality, rule of law, justice, and fairness: Tend to be used interchangeably in codes

In general, the coding process shows that: a) codes sometime use values without much consideration and sometime in a very detailed and careful manner; b) some values are so close that it is difficult to see whether they are neighboring values or synonyms; c) some values are all encompassing (e.g. accountability, integrity), the implication being that the precise meaning is not clear to the writer of the code or to the interpreter, that the meaning can differ from one code to another or from one situation to another and thus easily can be used as a facade or window dressing value.

Thus, though the quantitative content analysis gives an overview of the values identified, it is but a rude indicator of value profiles. In order to establish more detailed information on the values and their importance in the codes three steps were taken in qualitative strategy:

An analytical reading of the codes in their entirety.

When splitting the codes up in to small pieces as done in the coding-process, there is a risk of loss of meaning. The extra reading try to grasp value-statements communicated indirectly.

Identifying/analyzing if the coded values were primary or instrumental to other values

This is done by studying the coded results and - one by one, code for code - establish their internal relations (e.g. acting accountable in order to serve the common good etc.).

Identifying/analyzing if the value has many neighbor- and co-values

Same process a under b, but with focus on neighbor/co-value relations
Table 1. Search for ethic* code* in Social Science Citation Index
Table 2. Combination search on ethic* code* OR code* of conduct OR ethic* principle* AND “public”
Figure 1. The structure of the public values universe
### Table 3. Constellations, subgroups and public values

<table>
<thead>
<tr>
<th>Value constellations</th>
<th>Public values</th>
</tr>
</thead>
</table>
| 1. Public sector’s contribution to society | - **Public interest**, common good, social cohesion  
- **Altruism**, human dignity  
- **Sustainability**, voice of the future  
- **Regime dignity**, regime stability |
| 2. Transformation of interests to decisions | - **Majority rule**, democracy, will of the people, collective choice  
- **User democracy**, local governance, citizen involvement  
- **Protection of minorities**, protection of individual rights |
| 3. Relationship between administrators and politicians | - **Political loyalty**, accountability, responsiveness |
| 4. Relationship between public administrators and their environment | - **Openness**, responsiveness, listening to the public opinion, secrecy  
- **Neutrality**, impartiality compromise, balancing of interests, advocacy  
- **Competitiveness**, cooperativeness |
| 5. Intraorganizational aspects of public administration | - **Robustness**, adaptability, stability, reliability, timeliness  
- **Innovation**, enthusiasm, risk readiness  
- **Effectiveness**, productivity, parsimony, business-like approach  
- **Self-development of employees**, good working environment |
| 6. Behaviour of public-sector employees | - **Accountability**, professionalism, honesty, moral standards, ethical consciousness, integrity, |
| 7. Relationship between public administration and the citizens | - **Rule of law**, legality, protection of individual rights, equal treatment, justice  
- **Equity**, reasonableness, fairness, professionalism  
- **Dialogue**, responsiveness, user democracy, citizen involvement, citizens’ self-development  
- **User orientation**, friendliness, timeliness |

Adapted from Beck Jørgensen & Bozeman (2007: 360-361).
Table 4: Indexed distribution of values on value constellations

<table>
<thead>
<tr>
<th>Constellation</th>
<th>CA</th>
<th>DK</th>
<th>ER</th>
<th>ES</th>
<th>GB</th>
<th>IT</th>
<th>KR</th>
<th>NO</th>
<th>NZ</th>
<th>PO</th>
<th>RO</th>
<th>SA</th>
<th>TY</th>
<th>UN</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The contribution of the public sector to society</td>
<td>15</td>
<td>6</td>
<td>7</td>
<td>7</td>
<td>13</td>
<td>21</td>
<td>3</td>
<td>11</td>
<td>4</td>
<td>11</td>
<td>10</td>
<td>17</td>
<td>16</td>
<td>14</td>
</tr>
<tr>
<td>2. Transformation of interests to decisions</td>
<td>5</td>
<td>3</td>
<td>3</td>
<td>4</td>
<td>3</td>
<td>3</td>
<td>1</td>
<td>0</td>
<td>3</td>
<td>1</td>
<td>3</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>3. Relationship between public administrators and politicians</td>
<td>8</td>
<td>3</td>
<td>15</td>
<td>7</td>
<td>4</td>
<td>8</td>
<td>12</td>
<td>0</td>
<td>2</td>
<td>9</td>
<td>14</td>
<td>9</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>4. Relationship between public administrators and their environment</td>
<td>13</td>
<td>19</td>
<td>18</td>
<td>11</td>
<td>19</td>
<td>8</td>
<td>17</td>
<td>10</td>
<td>6</td>
<td>22</td>
<td>12</td>
<td>7</td>
<td>13</td>
<td>7</td>
</tr>
<tr>
<td>5. Intraorganizational aspects of public administration</td>
<td>12</td>
<td>13</td>
<td>17</td>
<td>8</td>
<td>6</td>
<td>5</td>
<td>11</td>
<td>7</td>
<td>13</td>
<td>11</td>
<td>12</td>
<td>16</td>
<td>9</td>
<td>19</td>
</tr>
<tr>
<td>6. Behaviour of public employees</td>
<td>31</td>
<td>32</td>
<td>23</td>
<td>41</td>
<td>33</td>
<td>36</td>
<td>48</td>
<td>50</td>
<td>72</td>
<td>32</td>
<td>37</td>
<td>38</td>
<td>37</td>
<td>39</td>
</tr>
<tr>
<td>7. Relationship between public administration and the citizens</td>
<td>16</td>
<td>24</td>
<td>17</td>
<td>21</td>
<td>22</td>
<td>21</td>
<td>9</td>
<td>20</td>
<td>4</td>
<td>13</td>
<td>15</td>
<td>10</td>
<td>21</td>
<td>16</td>
</tr>
</tbody>
</table>
Table 5: The importance of value subgroups within value constellations.

<table>
<thead>
<tr>
<th>Constellations with subgroups</th>
<th>C</th>
<th>D</th>
<th>D</th>
<th>ER</th>
<th>ES</th>
<th>ES</th>
<th>G</th>
<th>IT</th>
<th>K</th>
<th>R</th>
<th>N</th>
<th>N</th>
<th>PO</th>
<th>R</th>
<th>SA</th>
<th>T</th>
<th>U</th>
<th>N</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public interest</td>
<td>●</td>
<td>○</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>1 Altruism</td>
<td>○</td>
<td>●</td>
<td>○</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Sustainability</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Regime dignity</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Majority rule</td>
<td>○</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>2 User democracy</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Protection of minorities</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>3 Political loyalty</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Openness</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>4 Neutrality</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Competiveness</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Robustness</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>5 Innovation</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Effectiveness</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Self-development of employees</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>6 Accountability</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Rule of law</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>7 Equity</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Dialogue</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>User orientation</td>
<td>○</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
<td>●</td>
</tr>
</tbody>
</table>

Each subgroup is labelled by the first value mentioned in that subgroup. For example, subgroup “accountability” constellation 6) consists of the following values: accountability, professionalism, honesty, moral standards, ethical consciousness and integrity.

- = not mentioned
○ = only superficial mentioned
● = mentioned directly in several contexts
● = nodal value, mentioned several times and with strong relations to a number of other values (instrumental, neighbouring, subordinate)
Table 6. Values in codes re-categorised according to administrative tradition

<table>
<thead>
<tr>
<th>Administrative tradition</th>
<th>Scandinavian</th>
<th>Anglo-saxon</th>
<th>South Europe</th>
<th>East Europe</th>
<th>Others</th>
<th>Model-codes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public interest</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 Altruism</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 Regime dignity</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 Majority rule</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 User democracy</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5 Political loyalty</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6 Openness</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7 Neutrality</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8 Competiveness</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9 Robustness</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10 Innovation</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11 Effectiveness</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12 Employee self-</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13 Development</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14 Accountability</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15 Rule of law</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16 Equity</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17 Dialogue</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18 User orientation</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

35