

VALUES ADDED

How companies can use values to enhance
their anti-corruption approach

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Editor: Rocio Paniagua, Head of Business Integrity, TI-UK

Researcher: Tilly Prior, Senior Programme Officer, Business Integrity, TI-UK.

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KEY TERMS

Anti-corruption approach – a company's entire approach to addressing corruption, covering not just the formal anti-bribery and corruption programme but also encompassing incentive structures and culture.

Behavioural science – drawing from fields such as economics and psychology, behavioural science studies human behaviour and devises ways to improve the choices made and influence how individuals react in the workplace. This could be using the insights from behavioural science to reduce bias in boardrooms, improve strategic decision-making or enhance company culture.¹

Compliance – the act of adhering to or conforming to a law, rule, demand or request. Compliance could be conforming to internal and external laws, regulations, rules, values, and policies in a business environment.²

Company values – the set of values determined by an organisation to ensure the company is working towards a common goal.

Culture – is the ideas, institutionalisations, customs, and social behaviour of a particular society or company. Culture is comprised of both explicit forces such as rules and implicit forces, including the shared assumptions, beliefs and values that drive behaviour. In this way, culture provides a framework and context to understand behaviour. For instance, culture is often a stronger predictor of a person's behaviour than their individual predispositions.

Guiding principles – provide the supporting explanation of what the company values mean in practice and the expected behaviour resulting from the values.

Rules-based anti-corruption – creating an anti-corruption approach that prescribes in detail a set of rules that tells employees how to behave.³

Values – are the basic and fundamental beliefs that guide or motivate attitudes or actions. In business, values help ensure all employees work towards the same company vision and, most importantly, shape the company culture.

Values-based anti-corruption – an anti-corruption approach that relies on company values to shape employee behaviour to act with integrity. This approach uses consistent reinforcement and application of the values to encourage employees to self-police and draw on internal motivation rather than relying on merely rules and legal requirements.

¹ McKinsey & Company, 'Lessons from the Front Line of Corporate Nudging' (2019) <<https://www.mckinsey.com/business-functions/people-and-organizational-performance/our-insights/lessons-from-the-front-line-of-corporate-nudging>> [accessed 11 April 2022].

² IONOS, 'Compliance: Guidelines for Compliant Corporate Behaviour' (2019) <<https://www.ionos.co.uk/startupguide/grow-your-business/compliance/>> [accessed 11 April 2022].

³ 'Anti-Corruption Ethics and Compliance Handbook for Business' (2013) <<https://www.oecd.org/corruption/Anti-CorruptionEthicsComplianceHandbook.pdf>> [accessed 11 April 2022].

EXECUTIVE SUMMARY

The annual costs of international corruption is estimated to amount to a staggering \$3.6 trillion in the form of bribes and stolen money.⁴ And there is a perception that the problem seems to be getting worse. In 2021, bribery and corruption featured in the top three most important issues that need to be addressed in the Institute of Business Ethics Public Attitudes Survey – a public opinion poll of UK respondents on how ethical British business is. This was the first time bribery and corruption featured since 2014.⁵ The survey also showed that the public's view of business has significantly worsened. In 2020, 59% of respondents surveyed believed businesses acted ethically; however, in 2021, just 40% of respondents believed businesses acted ethically.

High profile scandals and cases in court have led some to claim that the current approach to preventing company wrongdoing is not working.⁶ The prevailing wisdom is that to prevent corruption, a company should create and prescribe policies and procedures that tell employees how to behave. This is commonly known as a rules-based approach. However, procedures cannot anticipate every scenario, and employees may find that compliance with policies is at odds with the company or team culture. Research has demonstrated that people are heavily influenced by social norms and the environment in which they are immersed.^{7 8}

To tackle corruption effectively, it is therefore important that the anti-corruption approach is supported or even led by the company values. Taking a values-based approach aims to affect employee behaviour and create a culture of integrity, therefore reducing the risk of unethical behaviour.

By using values to guide behaviour a company can encourage self-policing and intrinsic motivation rather than mere compliance with rules and legal requirements.

This report provides a guide for companies who wish to introduce values into their anti-corruption approach. While it is not meant to be prescriptive, it aims to provide learnings that companies can apply within their organisations.

The basic process of a values-based approach can be broken down into four key stages that will form the structure of this report.

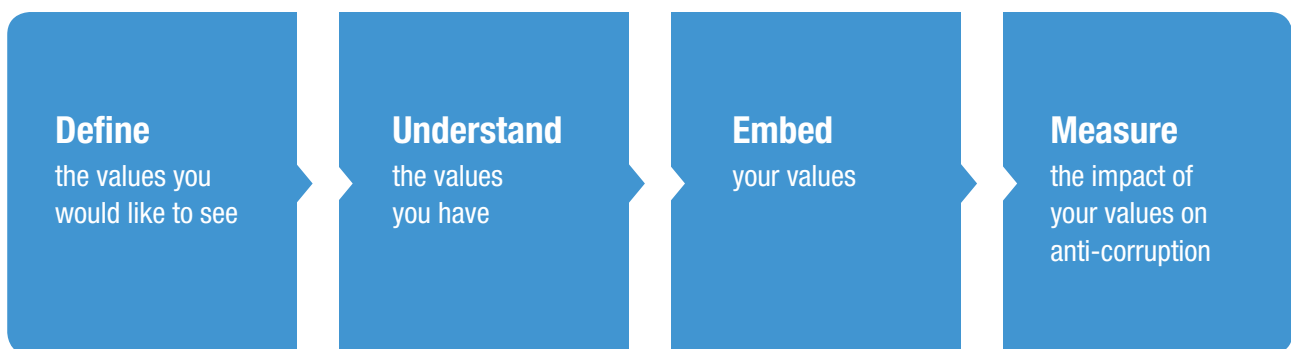


Figure 1: The basic process of a values-based approach.

⁴ World Economic Forum, 'Corruption is costing the global economy \$3.6 trillion dollars every year (2018)' <<https://www.weforum.org/agenda/2018/12/the-global-economy-loses-3-6-trillion-to-corruption-each-year-says-u-n>>[accessed 11 April 2022].

⁵ Institute of Business Ethics, 'Attitudes of the British Public to Business Ethics' (2021) <<https://www.ibe.org.uk/resource/publicattitudes2021.html>>[accessed 11 April 2022].

⁶ Andy Hayward and Tony Osborn, 'Ten Reasons Why Compliance Fails' (FCPA Blog, 2019) <<https://fcpablog.com/2019/09/20/ten-reasons-why-compliance-fails/>>[accessed 11 April 2022].

⁷ Newton, Griffin, & Ross, Actual versus estimated impact of persona and situation in determining pro-social behaviour, Stanford University 1988.

⁸ Robert B. Cialdini, Raymond R. Reno and Carl A. Kallgren, 'A Focus Theory Of Normative Conduct: Recycling The Concept Of Norms To Reduce Littering In Public Places.' (1990) 58 Journal of Personality and Social Psychology.



KEY LEARNINGS

Drawing from an extensive literature review, expert interviews and a series of focus groups, we have identified the following 10 key learnings to help you enhance your approach to anti-corruption.

1 Integrate your approach

Values and rules should not be seen to be mutually exclusive. On the contrary, your anti-corruption approach will be more effective if values are integrated into the rules.

2 Baseline

The first step of any change process is to understand where your organisation is currently. A cultural assessment should be done to establish a benchmark of how the existing values are being applied throughout your organisation.

3 Consult

Consulting with your employees will help determine what values exist within your company and what values should be introduced to change behaviours.

4 Take a holistic view

Recognise that values that may not appear to link to anti-corruption directly can still impact your anti-corruption approach.

5 Keep it simple

Keep the number of values to a minimum and continuously communicate values.

6 Relate values to everyday work

Demonstrate your company values in all aspects of work. Make sure your managers lead by example through actions not just words alone.

7 Promote

Several methods to help embed values in your organisation, such as behavioural “nudges”, incentives and incorporating values into the hiring process.

8 Learn

Learn from other industries that have used values successfully.

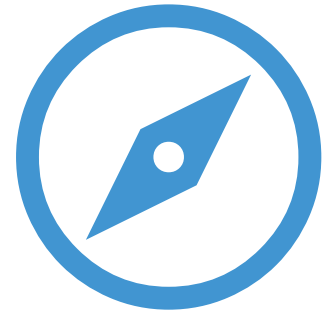
9 Measure

To understand if incorporating values has had an impact on your anti-corruption risk, you need to measure the effectiveness of your approach.

10 Iterate

Periodically measure and refine your approach based on what works for you.

CHAPTER 1: INTRODUCTION



The purpose of this report

This report aims to advance the understanding of the role that values can play in enhancing broader anti-corruption approaches. Causal links in this particular area are rare. As such, this report focuses on key learnings from our consultation and research. These will help to progress understanding of the subject for companies looking to incorporate values into their anti-corruption approach.

The report is designed for companies who are yet to introduce a set of values as well as companies who have values in place but are looking to progress their approach.

Drawing from the existing literature, three focus groups, and interviews with experts from across business, government and academia, we outline practical steps to help companies introduce values into their anti-corruption approach.⁹ The report is broken into five sections:

Chapter 1: Introduction: background to our research, including the legislative and policy context for values-based approaches to anti-corruption.

Chapter 2: Defining values: define the meaning of values in the private sector context, conceptualise the relationship between values and a rules-based approach.

Chapter 3: Understanding and developing company values: exploring how companies can understand the existing values within the organisation is an important step to begin the journey to embedding values that will positively impact the anti-corruption approach. We also explore best practices on developing new company values.

Chapter 4: Embedding company values: key learnings and methods that companies can consider using to embed new company values.

Chapter 5: Measuring values: methods to evaluate whether the values have been embedded in the company.

Policy and legislative context

Individuals can find themselves powerfully motivated to engage in corrupt behaviour. Profits and shareholder returns are often the primary means used to measure company performance. Therefore, employees can find themselves incentivised to cut corners or even engage in bribery and corruption in order to meet sales targets or remuneration criteria.

A 2022 Global Economic Crime Survey highlights that corruption continues to be a challenge for businesses. 46% of surveyed organisations reported experiencing fraud, corruption or other economic crimes in the last 24 months.¹⁰ At the same time there were numerous high profile corruption cases before the courts, including:

- Petrofac, which was found guilty of the payment of bribes to secure contracts and were fined over £47 million.¹¹
- Ericsson entered into a three-year Deferred Prosecution Agreement (DPA) with the US Department of Justice (DOJ) to resolve criminal charges related to violations of the Foreign Corrupt Practices Act in 2019.¹²
- Amec Foster Wheeler Energy Limited entered into a DPA with the Serious Fraud Office (SFO) in July 2021.¹³
- GPT which pleaded guilty to corruption.¹⁴
- Rolls Royce were ordered to pay £497.25 million plus costs in its settlement.

More importantly, the broader impact of corruption must be recognised. The consequences of corruption including economic loss and inefficiency, mean resources are diverted from their

⁹ See Annexe I for a more detailed methodology.

¹⁰ PricewaterhouseCoopers, 'PwC's Global Economic Crime Survey 2022' <<https://www.pwc.com/gx/en/services/forensics/economic-crime-survey.html>> [accessed 10 May 2022]

¹¹ Financial Times, 'Petrofac Ordered to Pay \$95m After Admitting Middle East Bribery' <<https://www.ft.com/content/553f0f64-6f54-4ec9-92e4-a69ad9490cf9>> [accessed 11 April 2022].

¹² Ericsson, 'Ericsson Reaches Resolution on U.S. FCPA Investigations' (2019) <<https://www.ericsson.com/en/press-releases/2019/12/ericsson-reaches-resolution-on-u.s.-fcpa-investigations>> [accessed 11 April 2022].

¹³ Serious Fraud Office, 'SFO Enters into £103m DPA with Amec Foster Wheeler Energy Limited' (2021) <<https://www.sfo.gov.uk/2021/07/02/sfo-enters-into-103m-dpa-with-amec-foster-wheeler-energy-limited-as-part-of-global-resolution-with-us-and-brazilian-authorities/>> [accessed 11 April 2022].

¹⁴ SFO, 'GPT pleads guilty to corruption' (2021) <<https://www.sfo.gov.uk/2021/04/28/gpt-pleads-guilty-to-corruption/#:~:text=The%20Serious%20Fraud%20office%20confirms,the%20Saudi%20Arabian%20National%20Guard.>> [accessed 11 April 2022].

8. TRANSPARENCY INTERNATIONAL – VALUES ADDED

most beneficial use such as funding for public infrastructure.¹⁵ The burden of these consequences, while not always apparent, is often borne by marginalised groups in society.

In recent decades there have been huge legislative steps to reduce private sector corruption in the UK. The Bribery Act 2010 introduced substantial improvements to the clarity, scope and enforceability of previous laws. It is among the strictest legislation internationally on bribery. Notably, section 7 of the act introduces a strict liability offence for companies and partnerships of failing to prevent bribery. Introducing this corporate criminal offence places a burden of proof on companies to show they have adequate procedures to prevent bribery.

Consequently, companies have invested heavily to create anti-bribery and corruption programmes to ensure employees firstly, do not engage in bribery; and secondly, comply with the legal requirements. However, the persistence of bribery and corruption suggests that deterring corrupt behaviour requires more than policies. Corruption is a much broader concept than bribery and it is necessary to overlay rules with values to ensure it is fully addressed.

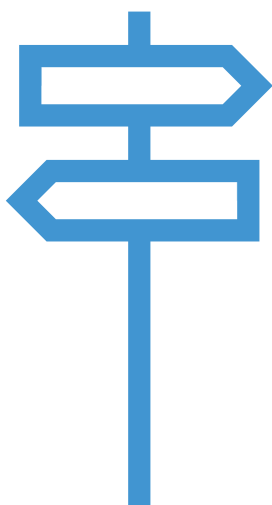
While company values are not new, companies are increasingly incorporating them into their wider anti-corruption approach to support and enhance the previously introduced written policies.

The UK Bribery Act 2010 and supporting guidance sets out high-level outcomes while giving companies flexibility in achieving the outcomes.¹⁶ This means that introducing values into a UK anti-corruption programme fits within the legislative requirements as long as companies are able to demonstrate that they have adequate procedures in place.

In the last few years regulators have been looking more broadly than policies and procedures. For example, the Financial Conduct Authority (FCA), which oversees the financial services industry in the United Kingdom, introduced a series of 5 Conduct Questions, which presented guidance on how firms can improve risk management by ensuring all members of staff are personally accountable and engage with core values.¹⁷

Notably, the latest question set not only focuses on the tone from the top but also on “tone from within”, which requires every person in an organisation to be personally accountable and engaged with the core values.¹⁸

Despite this increasing relevance, many companies are still struggling to link their values to their anti-corruption approach meaningfully. The next section explains broadly what values are and how they can work together with other aspects of the anti-corruption approach.



¹⁵ UNODC, Effects of Corruption' <<https://www.unodc.org/e4j/en/anti-corruption/module-1/key-issues/effects-of-corruption.html>> [accessed 11 April 2022].

¹⁶ Squire Patton Boggs, Bribery Act 2010: Section 7 Guidance' <<https://www.anticorruptionblog.com/uk-bribery-act/bribery-act-2010-section-7-guidance>> [accessed 11 April 2022].

¹⁷ Lexology, 'The FCA's 5 Conduct Questions: Senior Managers of all Firms Required to Consider Their Culture' <<https://www.lexology.com/library/>> [accessed 11 April 2022].

¹⁸ Financial Conduct Authority, 'Compliance Culture and Evolving Regulatory Expectations' (2021) <<https://www.fca.org.uk/news/speeches/compliance-culture-and-evolving-regulatory-expectations-mark-steward>> [accessed 11 April 2022].

CHAPTER 2: DEFINING VALUES

In this chapter we seek to define and conceptualise how values can be used within the anti-corruption approach. Often values and rules are seen at odds with each other. However, we aim to make the case that values and rules work best when they are supporting each other.

What are values and what are they for?

Values are basic and fundamental beliefs that guide or motivate attitudes or actions. In business, values help ensure employees work towards the same company vision and, most importantly, shape the company culture.

Company values are the set of concepts or ideals organisations adopt to ensure a company works towards a common goal. For example, Lego stated that it wanted to create a free-thinking working environment that inspired creative and happy employees. Mirroring the company values with the values it encouraged in its toys would promote that creative environment. As a result Lego's core values are:

- Imagination
- Creativity
- Fun
- Learning
- Caring
- Quality¹⁹

If values are not embedded, they risk simply being window-dressing. An example of a common company value is “respect”. However, this company value isn't always pursued in practice. Petrofac, who include the value of respect in its set of core values was found guilty of bribery in 2021.

For values to have an impact on an anti-corruption approach companies must ensure these values are embedded into the company culture to influence employee behaviour. This can encourage decision-making that is in line with the company values.

What is the role that values can play?

Many companies have a list of company values that enshrine the ethos of their business. Often these form part of the company mission statement that seeks to illustrate who the firm is and how it operates — for example, responsible, excellent and innovative.²⁰

Some of the experts we interviewed suggested that values allow for the implementation of a more dynamic anti-corruption approach which is agile in the face of changing business objectives. Keeping a core set of values can help to bring consistency in a changing business environment as employees and management will understand how to apply the principles to changing scenarios or requirements.

A company can enhance its anti-corruption approach by using core company values to lay the foundation for all decision-making and actions of the organisation.²¹

As one interviewee explained:

“Values are being used as a decision-making tool; they help motivate individuals and drive the right behaviours.”

[Anti-corruption expert, NGO]

Although company values may tend to seem like the preserve of C-suite executives and branding managers, some anti-corruption and bribery programmes are exploring whether they can be used as way to ensure staff behave ethically and in a way that reduces their bribery and corruption risk. Advocates of this approach believe that companies that embed their company values into the anti-corruption rules will be more adept at creating a healthy company culture and encouraging an intuitive sense of what the desired behaviours are.

Many of the experts we spoke to agreed that values should not be considered in isolation. As figure 2 below illustrates values will influence rules, social norms and decision-making and vice versa. Values are most effective when understood as part of the broader system of anti-corruption.²²

¹⁹ The Entrepreneur, 'How 5 Companies Found the Perfect Company Culture Within Their Business' (2017) <<https://www.entrepreneur.com/article/304655>> [accessed 11 April 2022].

²⁰ Siemens, 'Value and Vision' <<https://new.siemens.com/gr/en/company/about/values-and-visions.html>> [accessed 11 April 2022].

²¹ Christopher Hodges and Ruth Steinoltz, *Ethical Business Practice and Regulation: A Behavioural and Values-Based Approach to Compliance and Enforcement* (Bloomsbury Publishing Plc 2017).

²² Figure 2. *The Culture Cycle*. Adapted from Markus and Conner (2014) and Hamedani & Markus (2019) <<https://www.frontiersin.org/articles/10.3389/fpsyg.2019.00700/full>> [accessed 11 April 2022].



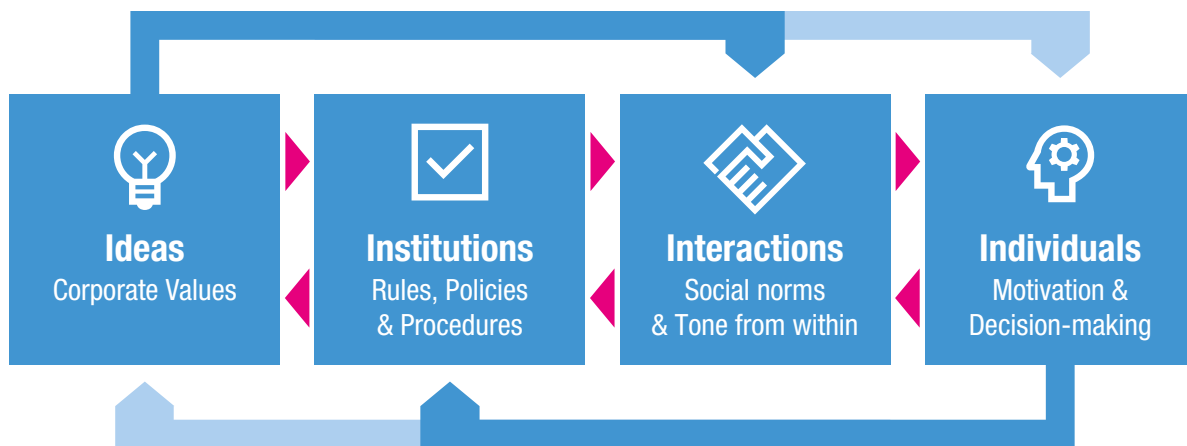


Figure 2: Values cycle. a broad system of anti-corruption.

Scale of values-based anti-corruption

While a number of companies have adopted some form of values-based approach to help foster a positive anti-corruption culture, they have applied them in different ways.

Minimalist approaches create a set of company values that the company refers to – for example, in their code of conduct or speeches from their CEO – without embedding them in the company culture.

Maximalist approaches may involve company values that are embedded within the organisation to help drive the right behaviours. This could involve deploying behavioural “nudge” techniques to subtly encourage employees to take certain courses of action. For example, if a company wanted to improve accuracy in its gifts and hospitality register, it might require its employees to acknowledge that they have read the set of company values before completing the gifts and hospitality register to encourage greater honesty. Other processes that could benefit would be as part of signing off a transaction or a customer due diligence. For example asking “how does this proposal meet/support our company values?”

How do values and rules-based anti-corruption link?

There are two general schools of thought when it comes to determining an anti-corruption approach.

The more traditional is the rules-based approach, which creates an anti-corruption programme that prescribes in detail a set of rules that tells employees how to behave.²³ One of the supposed advantages of this method are that it provides a set of concrete rules for employees to follow and typically consists of prescribed rules in the form of an anti-bribery and corruption policy.

However, it has come in for criticism for being too prescriptive and relying too heavily on external motivators such as penalties. The priority can therefore become taking whatever action is required to avoid the penalty rather than actually to avoid corruption risks. As a result the rules-based approach can become little more than a tick-box exercise, the main function of which is to allow an employer to cover their back.

A values-led approach is now being proposed as an alternative by advocates who think that the rules-based approach has failed to deliver effective measures to prevent corrupt practices in the workplace. A company may wish to use values as a way to shape employee behaviour and act with integrity.

To embed values it is important that a company uses consistent reinforcement and application of values to encourage employees to self-police and draw on internal motivation rather than relying on merely rules and legal requirements. The supposed advantages of incorporating values are that it creates an increased sense of ownership over the anti-corruption approach and helps to develop a healthy company culture. However, it's not without its own shortfalls, without supporting rules, values run the risk of being misapplied.

²³ 'Anti-Corruption Ethics and Compliance Handbook for Business' (2013) <<https://www.oecd.org/corruption/Anti-CorruptionEthicsComplianceHandbook.pdf>> [accessed 11 April 2022].

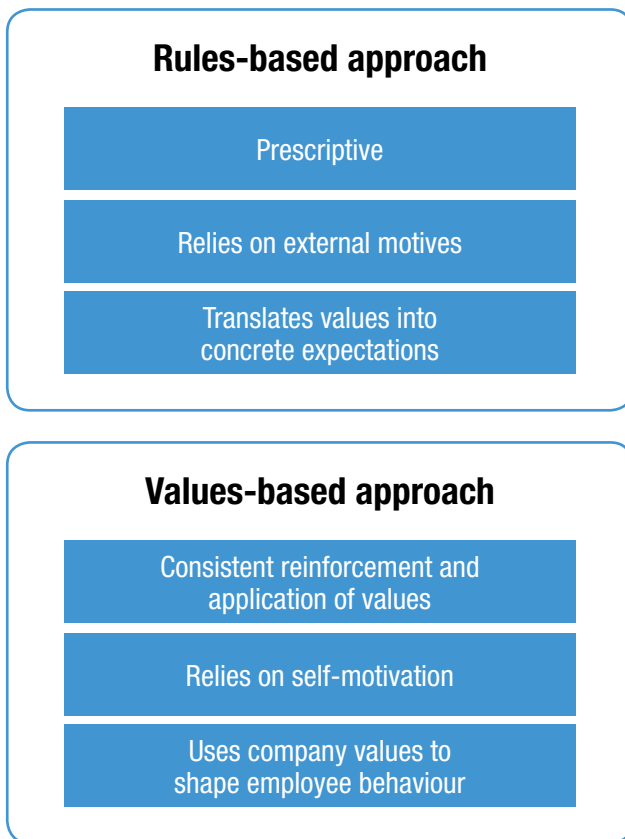


Figure 3: Rules-based and values-based approaches.

In practice, this is not a binary and mutually exclusive choice, and more one of emphasis. Values-led anti-corruption emphasises self-motivation in decision-making which can be contrasted with a rules-based approach that prescribes in detail a set of rules that tells employees how to behave. However, the majority of interviewees we spoke to suggested that rules-based approaches and values-based approaches work best in partnership with each other. One interviewee explained:

“There are different logics that underpin both approaches; however, they’re not mutually exclusive, they can and should work together. You may have a fully values-based approach in an ideal world, but that doesn’t seem realistic. You always need a relationship between values and compliance approaches.”

[Academic]

When working in tandem, values can help to reinforce the efficiency of a rules-based approach. Interviewees we spoke to suggested that they found employees struggled to accept rules without reason. However, if rules align with employee values, they were more likely to accept them. One company we spoke to explained how this could be done in practice providing a reason for rules in its code of ethics. Below is an extract from the anti-bribery section of the code of ethics:

Our commitment is to not tolerate any form of bribery or corruption. We will not give, offer or promise to give anything of value or accept, request or agree to receive anything of value for the purpose of improperly influencing any decisions. We will not use third parties to commit acts of bribery or corruption.

*Why it matters? To improve access to medicine we need to address corruption. It erodes trust in both governments and businesses and reduces access to public services including health and education.*²⁴

Many interviewees we spoke to suggested that creating a code of conduct or ethics helps translate values into practical expectation and that helps to ensure that values are not misapplied.²⁵ Without sufficient knowledge of what the value means in practice, even if the employee believes they have the right understanding, they might misapply the value. Using rules and values together helps create an environment where employees have sufficient knowledge to apply values when making decisions.

Benefits of embedding values into an anti-corruption approach

Increased ownership of the anti-corruption approach

Increasing employee ownership of the anti-corruption approach was one of the key benefits of a values-based approach cited by the participants we interviewed.

The suggestion was that if employees feel ownership and accountability of their company’s anti-corruption programme they will work towards reducing corruption, even when no one is watching, such as speaking up if they see wrong behaviour. Having a culture that encourages speaking up is vital to tackling corruption. Without this, the risk for companies is that employees will remain silent on corruption issues as they are worried about being viewed negatively. Creating a working environment where employees feel empowered and in control of their environment is vital to encouraging employees to speak up.²⁶

²⁴ Novartis, ‘Code of Ethics’ <https://www.novartis.com/sites/novartis_com/files/code-of-ethics-english> [accessed 11 April 2022].

²⁵ Small Business Chron, ‘Explaining Compliance Based Business Ethics’ (2020) <<https://smallbusiness.chron.com/explain-compliance-based-business-ethics-243.html>> [accessed 11 April 2022].

²⁶ Harvard Business Review, ‘Research: What Makes Employees Feel Empowered to Speak Up?’ (2021) <<https://hbr.org/2021/10/research-what-makes-employees-feel-empowered-to-speak-up>> [accessed 11 April 2022].

Employee attraction

Values define a company at its core and are one of the most important aspects for attracting and retaining employees. A recent study found that 71% of professionals said they would be willing to take a pay cut to work for a company with a mission they believe in and shared values.²⁷ Additionally, nearly 2 in 5 (39%) of professionals would leave their current job if their employer were to ask them to do something they have an ethical or moral conflict with.²⁸ A company can harness this attachment to values to improve its anti-corruption programme.²⁹

Creating a healthy culture

Interviewees we spoke to suggested that companies that prioritised values in creating new strategies had seen a higher level of innovation and productivity and less fluctuation in the workforce. According to a recent survey by the National Bureau of Economic Research, nine out of 10 chief financial officers believe improving company culture would increase their company's business value and performance.³⁰

Using data from over 800 employees, Linn Van Dyne of Michigan State University and Jon L. Pierce of the University of Minnesota Duluth found that employees' sense of psychological ownership for the company is positively associated with both their attitudes and work behaviour.³¹

The study suggests that when employees feel a sense of ownership, they are more inclined to produce helpful and proactive behaviours.



²⁷ Nina McQueen, 'Workplace Culture Trends: The Key to Hiring (and Keeping) Top Talent in 2018' (LinkedIn, 2018) <<https://blog.linkedin.com/2018/june/26/workplace-culture-trends-the-key-to-hiring-and-keeping-top-talent>> [accessed 11 April 2022].

²⁸ Nina McQueen, 'Workplace Culture Trends: The Key to Hiring (and Keeping) Top Talent in 2018' (LinkedIn, 2018) <<https://blog.linkedin.com/2018/june/26/workplace-culture-trends-the-key-to-hiring-and-keeping-top-talent>> [accessed 11 April 2022].

²⁹ Christopher Hodges and Ruth Steinholtz, *Ethical Business Practice and Regulation: A Behavioural and Values-Based Approach to Compliance and Enforcement* (Bloomsbury Publishing Plc 2017).

³⁰ Harvard Business Review, 'Build a Culture That Aligns with People's Values' (2020) <<https://hbr.org/2020/04/build-a-culture-that-aligns-with-peoples-values>> [accessed 11 April 2022].

³¹ Harvard Business Review, 'How to Make Employees Feel Like They Own Their Work' (2015) <<https://hbr.org/2015/12/how-to-make-employees-feel-like-they-own-their-work>> [accessed 11 April 2022].



TIPS AND LEARNINGS FOR EMBEDDING VALUES INTO AN ANTI-CORRUPTION APPROACH

In part of the report we provide you with tips and learnings for how to understand and develop, embed and measure your company values.

CHAPTER 3: UNDERSTANDING AND DEVELOPING COMPANY VALUES

To develop company values that employees will understand and apply to their working life, it is helpful to first review the values you currently hold. Here we outline some of the learnings we have found that can help you to determine what values exist within your company and how you can develop values that can resonate with employees.

Understanding your values

Consult

Consulting a wide range of employees will help you to understand what values the employees relate to when making decisions. Consulting employees can help you determine how the values have materialised in the company culture. These values may be different to the company values that are written down. This can lead to behaviours that are not aligned with your company values. For example, a company value could be safety; however, the reality of how the value has been embedded is that the company has developed a culture where meeting deadlines is the priority and therefore corners are cut regarding safety.

Consulting your employees can help remove any disconnection between the values articulated by your top management and the values that exist in your company's day-to-day work. You will have more chance of the values being adopted if your employees believe they have been involved in their creation; without this, values will often be little more than words on paper. If employees feel listened to and recognise their values in day-to-day work, they are much more likely to uphold your company values even in difficult situations.

“Defining the values for an organisation should be a deliberate exercise to understand stakeholder and employee expectations and priorities. Companies should take these priorities to create a written set of values that can be expressed through a code of conduct.”

[Professional Service]

Consultations can include staff surveys, workshops and one-to-one interviews.

You could include the question, “what company values do you believe the company holds?” Other questions that are less obvious but can help to determine more subtle values and cultures that exist are:

“Have you seen any misconduct in the last year?”

“Do you trust your colleagues?”

“Does meeting a project deadline take priority over delivering exceptional work?”

When would a project deadline take priority over delivering exceptional work?

In the last year, where have you seen potential risks of misconduct increasing?

What enables you to trust your colleagues?

Developing a set of company values

Once you have understood the values within your organisation you can evaluate whether those values might be conducive to corruption risk. Understanding whether the company values are creating a corruption risk can help you determine the necessary behaviour change and develop values that will help support this change.

Additionally, you can identify the company values that you would like to introduce and what you might need to do to embed them. When developing new values, you may wish to consider the following tips and pointers.

Keep it simple

Try and keep the number of values to no more than three to five, and keep them simple and clear. This will help your employees keep the company values in the front of their minds when making ethical decisions and reduce the risk of them being forgotten. Some of the interviewees we spoke to explained that they believed that ethical lapses were reduced when a culture of integrity was centre of attention.

While it is important to have a limited number of values, it can be helpful to support these values with guiding principles to explain further what these values mean in practice so that the values cannot be misapplied. This helps to embed these values, we explain what guiding principles look like in practice in chapter four.



Take a holistic view

When creating a set of company values, it is helpful to remember that no single value will impact anti-corruption. Look at values holistically to create a culture in which bribery and corruption are not accepted and employees will intuitively act with integrity.

For example, a company we interviewed explained that embedding the company value of respect into its culture had led to a change in behaviour among employees in meetings. To meet its value of respect the company introduced a rule not to interrupt team members when they speak during meetings. The company found that after the rule was introduced employees felt more respected and valued and the company culture improved.

Research suggests that employees who feel appreciated are far less likely to view their employers negatively and therefore are less willing to engage in unethical or fraudulent behaviour.³²

According to a recent survey by the National Bureau of Economic Research, 85% of CEOs and CFOs believe an unhealthy culture leads to unethical behaviour.³³ Understanding the implications of values is essential for mitigating risk. A negative or toxic company culture can lead people to justify and rationalise problematic behaviours. For instance, if an employee feels overworked or not respected, they may feel the company owes them something and their ability to justify unethical behaviour may increase.³⁴

³² Harvard Business Review, 'Why Ethical People Make Unethical Choices' (2016) <<https://hbr.org/2016/12/why-ethical-people-make-unethical-choices>> [accessed 11 April 2022].

³³ Harvard Business Review, 'Build a Culture That Aligns With People's Values' (2020) <<https://hbr.org/2020/04/build-a-culture-that-aligns-with-peoples-values>> [accessed 11 April 2022].

³⁴ Christopher Hodges and Ruth Steinholtz, *Ethical Business Practice and Regulation: A Behavioural and Values-Based Approach to Compliance and Enforcement* (Bloomsbury Publishing Plc 2017).

CHAPTER 4: EMBEDDING COMPANY VALUES

This chapter sets out how you can embed company values into your workplace so they become more than just corporate slogans and your employees apply them in their everyday life.

How you can introduce values into your anti-corruption approach.

Before undertaking work on values some of our interviews suggested it can be helpful to ask individuals and teams questions. These can help to determine the building blocks on which the values will sit and therefore can help to inform the approach you take. Questions could be around what system the values are being embedded into. For example:

What are the norms of your company?

How mature is your anti-corruption approach?

Why do you want to use values to improve your anti-corruption approach?

You might feel it is necessary to embed the right values to create a more ethical culture. Or on the other hand you might be looking to embed values as a way to reduce the reliance on rules and minimise red tape.

Hiring

Think about how you can highlight your organisation's values during the hiring process. Signalling these in recruiting materials and designing the interview questions around your core values help all potential employees recognise what your company stands for. Questions that you could ask to highlight values include:

Describe a time when you had to work with a wide variety of people.

How did you go about identifying and understanding their points of view?

How did you adapt your working style to work more effectively with these people?

What was the outcome?

Has there ever been a time when your beliefs clashed with someone else's on your team? If so, how did you overcome these differences?

Training

One of the simplest ways to help ensure your values are communicated and understood in the context of anti-bribery and corruption is through training. Training helps to embed the values into the reality of your company. It is therefore important that any training on values deals with day-to-day scenarios.

A traditional rules-based approach to training often focuses on what can and cannot be done, and what the legal requirements are for your company. However, training that considers values often leans heavily on storytelling and scenarios to try and encourage higher engagement. Training should illustrate the link between anti-bribery and the real-world impact of corruption to help employees appreciate why anti-corruption policies and training is necessary. Many of the experts we interviewed suggested that if employees can understand the consequences of corruption in the real world, they are more likely to consider that impact when making decisions and, therefore, less likely to encourage negative behaviours.

When designing a training programme organisations should consider explaining to employees what the company values mean for specific roles. Your role as an employee, vastly influences how you interpret the appropriate course of action. For example, an employee who works in sales will likely apply a value differently from an employee in the legal department.

Incentives

Consider aligning financial bonuses and performance evaluations to ethical behaviour and values. This could include:

- Requiring your employees to evidence their ethical behaviour during their review processes without creating a performative approach or ingenuine commitment. Some of the ways you can encourage employees to demonstrate ethical behaviours during a review is to ask them to show evidence that they have:
 - Taken the time to understand the values and discuss what they mean with their team and peers.
 - Role modelled the values.
 - Dealt honestly with difficult issues.³⁵
- Linking additional compensation, such as bonuses, to your culture and strategy.³⁶

³⁵ Christopher Hodges and Ruth Steinholtz, *Ethical Business Practice and Regulation: A Behavioural and Values-Based Approach to Compliance and Enforcement* (Bloomsbury Publishing Plc 2017).

³⁶ <https://www.reporting.novartis.com/annual-review> [accessed 11 April 2022]

- Changing your appraisal process so that achieving business objectives and alignment with company values receive equal weighting in compensation reviews.³⁷

Following a performance evaluation, you can determine whether a deficit in one of these areas could lead to the removal of any bonus or if meeting one of the ethical criteria could lead to some form of remuneration.

While incentives are often seen to motivate behaviour, you should consider the potential implications of aligning values to remuneration. It can, in some instances, lead to negative behaviours such as not highlighting issues they may have been involved in if they are fearful this will affect their remuneration package.

Using nudges to encourage values in anti-corruption policies

Consider the potential benefits of behavioural science to help motivate your employees to behave with integrity.³⁸ One of the most well-known methods of behavioural science is the *nudge theory*, which uses a combination of positive reinforcement and unobtrusive suggestions to create an environment designed to encourage or guide individuals towards behaviours or decisions that align with company values.

An example of how nudge theory can help in anti-corruption programmes is using commitments. When people commit to an action publicly or privately, they are much more likely to act in line with that commitment. People want to be consistent in what they say.³⁹ You could nudge your employees to act with integrity by encouraging them to commit publicly to act with honesty and integrity.⁴⁰

For senior management, a public commitment could be a letter at the start of the code of conduct supporting anti-bribery and corruption. Several companies we interviewed also required their employee to sign a commitment to the code of conduct or anti-bribery policy; this is often when they join the organisation.

Anchoring bias means individuals often make choices based on pre-existing information or the information that came immediately before it. Recognising that individuals' willpower to

act with integrity is strained in highly stressful moments, you may wish to slow down the decision-making process to encourage more consideration of the ethical implication of any action.

In an experiment that asked MBA students to play the role of a financial adviser, researchers found that getting participants to complete an ethics checklist before recommending potential investment funds significantly decreased the percentage who recommended risky funds.⁴¹ By simply being reminded of the company values employees may behave differently. You may consider including ethical reminders to keep values salient to any task such as speeches by leadership, emails or in team meetings.

To do this you can include a checklist to prime employees with the correct type of information ahead of a task. The checklist could remind employees about their criminal liability under applicable anti-bribery and anti-corruption laws and confirm that they have complied with your company's ABAC policies.⁴²

Case Study Novartis – behavioural science and values.

Novartis uses behavioural science⁴³ to ensure their code of ethics is a living and interactive document. The company created an ethical framework that supported its code of ethics to assist employees when facing difficult decisions or challenges. The company used behavioural science to identify biases that are inherent in its employees. The ethical decision-making framework guides employees through 15 questions, prompting the individual employee to reflect on their decision-making process. The tool then identifies up to six possible biases based on how they responded and suggests materials and resources for further learning. The framework purposely does not give a definitive answer about what the employee should do. Instead, it is meant to broaden perspectives and encourage better understanding and application of its ethical principles. The leaders at the company are encouraged to: *“accommodate ethical considerations in business planning and decision-making, empowering associates to make responsible decisions, and creating a safe environment to speak up when ethical challenges arise.”*⁴⁴

³⁷ Novartis, 'Code of Ethics' <<https://www.novartis.com/esg/ethics-risk-and-compliance/ethical-behavior/code-ethics>> [accessed 11 April 2022].

³⁸ Ropes & Gray, 'Podcast: Culture & Compliance Chronicles: Behavioural Science – The Audit & Monitoring Perspective' (2020) <<https://www.ropesgray.com/en/newsroom/podcasts/2020/April/Podcast-Culture-Compliance-Chronicles-Behavioral-Science-The-Audit-Monitoring-Perspective>> [accessed 11 April 2022].

³⁹ Robert B. Cialdini and Melanie. R. Trost, 'Social influence: Social norms, conformity and compliance' (1998). Robert B. Cialdini and Noah J. Goldstein, 'Social Influence: Compliance And Conformity' (2004) 55 Annual Review of Psychology.

⁴⁰ Thepalladiumgroup.com, 'Palladium – The Subtle Science of Nudging Anti-corruption' (2018) <<https://thepalladiumgroup.com/news/The-subtle-science-of-nudging-anti-corruption>> [accessed 11 April 2022].

⁴¹ Harvard Business Review, 'How to Design an Ethical Organization' (2019) <<https://hbr.org/2019/05/how-to-design-an-ethical-organization>> [Accessed 11 April 2022]; Jeffrey Kaplan, 'Understanding behavioral ethics can strengthen your compliance program' (FCPA Blog, 2019) <<https://fcpublog.com/2019/10/21/understanding-behavioral-ethics-can-strengthen-your-compliance-program>> [Accessed 11 April 2022].

⁴² Thepalladiumgroup.com, 'Palladium – The Subtle Science of Nudging Anti-Corruption' (2018) <<https://thepalladiumgroup.com/news/The-subtle-science-of-nudging-anti-corruption>> [Accessed 11 April 2022]; OECD On the level, 'A Nudge in the Right Direction: Applying Behavioural Insights to Public Integrity' (2018) <<https://oecdonthellevel.com/2018/03/12/a-nudge-in-the-right-direction-applying-behavioural-insights-to-public-integrity>> [Accessed 11 April 2022].

⁴³ Henry Engler, Novartis applies behavioral science to code of ethics, unearthing biases and compliance gap, (Reuters 2020) <<https://www.reuters.com/article/bc-finreg-novartis-behavioral-science-in-idUSKBN27Q2MD>> [Accessed 18 May 2022]

⁴⁴ Novartis Code of Ethics (Novartis) <<https://www.novartis.com/esg/ethics-risk-and-compliance/ethical-behavior/code-ethics>> [Accessed 18 May 2022]

Embedding values into company norms

Awareness-raising

Awareness-raising should be one of your priorities when embedding values into your organisation. An easy way to keep values front and centre of employees' minds is to anchor any new initiative or policy to the company values. We interviewed several companies who linked their anti-bribery and corruption policies to their overarching company values. This helps employees to remember or consider values when making decisions in line with the policy. Therefore a policy can empower employees to act ethically in line with company values.

Case Study GSK – Values and Anti-Corruption Policies

An example of a policy that relates to the company values is GSK's Anti-Bribery and Corruption policy which states:

ABAC Foundational Principles are in line with our corporate values and expectations. They help us analyse if corruption is a risk.

Legitimacy of intent: our activities, interactions and transactions have a valid purpose and are conducted in line with our values and expectations.

*Ask yourself: Is what I am doing legal and in line with our values, expectations and standards?*⁴⁵

Use supporting principles

Using guiding principles to support your company values helps safeguard against values being misapplied. As explained earlier in the report, employees who believe they have the right understanding of a value can misapply it if they have the wrong knowledge of what the value means in practice. How staff adopt them is critical to the success of a values-based approach.

A well-intentioned value such as innovation can have unintended negative consequences when applied in practice such as engaging in bribery to increase revenues. If there are unintentional negative values within your organisation, staff will be more likely to feel comfortable and rationalise undertaking activities which could be considered unethical.

Creating a set of principles to support the values can provide your employees with sufficient knowledge to apply them in their decision-making.

Case Study Siemens – Using Supporting Principles

Siemens, outlines a series of principles that guide employees in their application of values. For example, for the value of “responsible” the following guiding principles are used. The employee must:

- Obey the law
- Respect the dignity of all people
- Foster health and safety
- Conduct business in a truthful and transparent manner
- In fair in their relationships with competitors and stakeholders
- Strive for the protection of the environment⁴⁶

Remember tone and conduct from within, not just tone from the top.

Tone from the top is necessary to embed values, as it sets your company's parameters, expectations and examples of behaviour. The values that have been embedded are what will make up your company culture. When seeking to embed company values, it is important to recognise that everyone plays a role. All employees need to buy into, be personally accountable for, and engaged with the company's new values.⁴⁷ To successfully change social norms managers need to lead by example through actions not just words alone.

One aspect that is often overlooked when embedding values is “tone in the middle”. Your middle management, such as team managers, need to set an example to their employees and show that values are lived throughout the organisation.⁴⁸ For example, your managers can encourage an ethical culture by frequently highlighting or praising ethical behaviour. Acknowledgement and appreciation in real-time can help to ensure values are embedded in a team. Your middle management needs to make a concerted effort to ensure that using the company values in their employees job is rewarded. It is important to understand that what gets recognised gets repeated, and leaders can leverage this as a simple tool for building strong culture.⁴⁹

⁴⁵ GlaxoSmithKline, 'Anti-Bribery & Corruption Policy' <<https://www.gsk.com/media/2976/anti-bribery-and-corruption-policy-v11.pdf>> [Accessed 11 April 2022].

⁴⁶ Siemens, 'Value and Vision' <<https://new.siemens.com/gr/en/company/about/values-and-visions.html>> [accessed 11 April 2022].

⁴⁷ Financial Conduct Authority, 'Compliance Culture and Evolving Regulatory Expectations' (2021) <<https://www.fca.org.uk/news/speeches/compliance-culture-and-evolving-regulatory-expectations-mark-steward>> [accessed 11 April 2022].

⁴⁸ Harvard Business Review, 'How to Design an Ethical Organization' (2019) <<https://hbr.org/2019/05/how-to-design-an-ethical-organization>> [Accessed 11 April 2022];

⁴⁹ Harvard Business Review, 'Build a Culture That Aligns With People's Values' (2020) <<https://hbr.org/2020/04/build-a-culture-that-aligns-with-peoples-values>> [accessed 11 April 2022].

Case study – the implementation of the values of openness and learning from the aviation sector

Those seeking to measure and review the effectiveness of introducing values can learn lessons from other sectors. Aviation is a sector that has devoted significant effort to creating systems that use values to create a culture of openness, which is vital to effectively monitoring the success of an approach.

In aviation, it was found that safety reviews did not always identify safety interventions that may be necessary for the future.

As a result, values of openness and shared responsibility were mandated by regulation and called a “Just Culture” referring to a system of shared accountability. Just Culture aims to prioritise open communication surrounding safety issues to ensure that safety issues are properly addressed and improved upon, and that, most importantly, accidents do not happen again.⁵⁰

The result of the “Just Culture” is that the aviation industry is now better placed to report safety-related information without fear of punishment, except in cases of gross negligence or wilful violations.⁵¹

One learning from aviation is that to address issues, it is vital to create a culture of openness and learning. Encouraging an organisation to learn from incidents is key to addressing issues such as corruption and bribery. To understand what went wrong, a company must have a value of openness to create an environment where employees feel confident reporting issues they find or explaining their role in the incident.

Several companies are using “ethics champions” to help teams understand the role of ethics and make the right decisions. An ethical champions’ role is not to be investigators or reporters but someone who can provide scenario-based training on ethics, facilitate discussions on values or be an avenue for employees to problem- solve ethical dilemmas. More often than not, ethics champions have been described as “walking symbols of a company’s commitment to its code of conduct”.⁵² They provide a visual representation of an employee who lives the company values to demonstrate how it can be done.



⁵⁰ 'Saftey Culture' (Aviation Benefits Beyond Borders)<<https://aviationbenefits.org/social-development/safety-culture/>>[Accessed 18 May 2022]

⁵¹ What is Aviation Culture (JETechnology)<<https://aircraftmaintenancestandards.com/blog/what-is-aviation-safety->>[Accessed 18 May 2022] and Amy C. Edmondson, Strategies for Learning from Failure, (Harvard Business Review, 2011)<<https://hbr.org/2011/04/strategies-for-learning-from-failure#>>[Accessed 18 May 2022]

⁵² Ernst & Young, 'How to Empower Local Compliance Champions with the Right Technology' (2020)<https://www.ey.com/en_us/forensic-integrity-services/how-to-empower-local-compliance-champions-with-the-right-technology>[Accessed 11 April 2022].

CHAPTER 5: MEASURING VALUES

This chapter outlines how you can evaluate the extent to which incorporating values into your anti-corruption approach is working in practice. It is essential to find a way to measure the impact of values to demonstrate that what you have in place works.

However, many companies still fail to undertake this critical step, sometimes for good reason. Measuring impact is often difficult, and when dealing with abstract concepts such as values it is even more so. Establishing how your values have changed behaviour and outcomes for the better or worse is not straightforward, but also not impossible.

Several interviewees we spoke to explained that measuring the impact of values was not an area they were currently exploring as it was difficult to find tangible evidence to support the causality between incorporating values into their anti-corruption approach and the reduction of their corruption risk. Current measurement of values tends to rely heavily on the use of surveys.

Our report *Make it Count* identifies how measuring effectiveness is key to developing activities that have the most impact in reducing the risk of corruption, and enabling companies to develop an anti-corruption programme that genuinely works. Measuring the impact of values is no different. It is important to measure whether incorporating values into the anti-corruption approach is having an impact on reducing the corruption risk of the company.

Here we provide some suggestions on how you can assess whether the changes you have made are having real impact at the coalface.

Measuring values using surveys

While measuring the impact of values is difficult, it is possible. Nearly every interviewee we spoke to uses some form of a survey as a way to measure the impact of its values. Employee surveys can also be supplemented with employee interviews (particularly exit interviews), appraisals and workshops to understand better the experience of those operating within a particular culture.⁵³

Common survey questions you could consider including are:

Do you feel under pressure to compromise your ethical standards to get the job done?

Does your manager tolerate behaviours that do not match with the company values?

Do you feel you can report unethical behaviour or practices, either via your manager or speak up without fear of retaliation?

Do you feel respected in the company?

Do you believe that the company culture and employee behaviour reflects the company values?

Employee self-reports on values can be unreliable. The values and beliefs that people say are important to them, for example, may well not be reflected in how they behave. Moreover, surveys provide static, or at best episodic, snapshots of constantly evolving organisations.⁵⁴

One way that you can improve survey reliability is by using factorial surveys. Factorial surveys present respondents with a hypothetical situation. The hypothetical nature of the scenario helps to prevent social desirability bias because research shows that respondents are more likely to be honest when they are not asked to report their own opinions or likelihood of noncompliance.⁵⁵ For example, when assessing the view of your employees on facilitation payments within the survey, you could include a scenario that describes the use of a facilitation payment and asks whether they think the scenario is acceptable or unacceptable rather than asking whether they have paid a facilitation payment in the last 12 months. Storytelling is a strong tool for measuring organisational values triangulating multiple stories can help to understand the reality of how values are embedded.

One interviewee suggested that using a survey companies can ask their employees what the company values are and what the embedded values are. You can gain an understanding of whether the effort being put into values is having an impact on reducing the gap between the company values written down and the values that are being embedded into the culture. Additionally, if the surveys are conducted quarterly or annually you can further track its progress of embedding its values.⁵⁶

⁵³ 'Make it Count' (2021) <<https://www.transparency.org.uk/make-it-count-anti-bribery-corruption-measuring-effectiveness-guidance-companies>> [Accessed 11 April 2022].

⁵⁴ Harvard Business Review, 'The New Analytics of Culture' (2020) <<https://hbr.org/2020/01/the-new-analytics-of-culture>> [Accessed 11 April 2022].

⁵⁵ Bloomberg Law, 'INSIGHT: Measuring Culture & Training: Factorial Surveys' (2018) <<https://huichenethics.files.wordpress.com/2018/11/factorial-surveys-final-pdf.pdf>> [Accessed 11 April 2022].

⁵⁶ Novartis, 'Anti-Bribery Report 2021' (2021) <<https://www.novartis.com/sites/novartis.com/files/anti-bribery-report-2021.pdf>> [Accessed 11 April 2022].



RELATED RESOURCES

When looking to progress an anti-corruption approach the following related resources may provide useful insights to incorporate in parallel to the learning provided in this report.

Open Business

Transparency International's *Open Business* report sets a new bar for disclosures in anti-corruption and governance and provides an aspirational but achievable roadmap to better corporate practice.⁵⁷

By demonstrating the value of harnessing transparency in these areas, this report shows how companies can embrace transparency to reduce corruption risk while also building consumer and public trust, protecting and building their reputation and gaining a competitive advantage.

Informed by extensive research including in-depth interviews with legal and compliance figures from FTSE 100 companies, insight from some of the world's biggest institutional investors, and Transparency International's anti-corruption expertise, this research:

- Sets out the business case for greater corporate transparency.
- Fills the current “guidance gap” by providing companies consolidated guidance on how to disclose policies and procedures publicly.
- Offers solutions to the most frequently cited legal challenges to greater disclosures.

Make it Count

Transparency International's *Make it Count* explores why and how a company ought to measure the effectiveness of its approach to anti-corruption. We analyse what is understood by “measuring effectiveness”, highlight practical considerations, and provide examples of metrics that are proving useful for companies.⁵⁸

The need to work on this subject arose as a result of *Open Business*. It became apparent that one of the reasons why companies are not disclosing meaningful anti-corruption information is because they are not gathering and measuring the necessary information on how they manage their corruption risks to subsequently disclose it. Companies that face significant corruption risks need to know whether their approach to anti-corruption works in practice and should be able to demonstrate that it does.

Open Business, *Make it Count* and this report can be read together to help companies progress the efficiency and effectiveness of their anti-corruption approaches. Tackling different but equally necessary aspects of a company anti-corruption approach, from transparency to measurement and finally to company culture.

⁵⁷ 'Open Business' (2020) <<https://www.transparency.org.uk/publications/open-business-anticorruption-governance-disclosure-guidance>> [Accessed 11 April 2022].

⁵⁸ 'Make it Count' (2021) <<https://www.transparency.org.uk/make-it-count-anti-bribery-corruption-measuring-effectiveness-guidance-companies>> [Accessed 11 April 2022].

ANNEXE 1: METHODOLOGY

This guidance is the product of extensive research, including:

- a review of the available literature on values-based and rules-based approaches to anti-bribery and corruption
- focus groups with companies, government departments, academics and professional services
- expert interviews
- peer review and input from an advisory board

Our starting point was to understand how values are being introduced and approached within anti-bribery and corruption through an extensive review of the literature available. This phase aimed to identify gaps in current literature and focus on the research we would be conducting. We found that there was substantial research on the theory behind values-based approaches, for example, a vast amount of literature explored control experiments to test how individuals respond to certain values or “nudges” that often form the basic principles of behavioural science. However, we found limited literature on the practical implementation of a values-based approach or the impact on corruption in the private sector.

We then ran a series of focus group meetings that comprised experts in the area – in house practitioners, academics, government agencies and individuals at professional services. A focus group is a research method involving a small group of people guided through a discussion by a moderator. Focus groups explore various issues, test solutions, and explore the group’s perspective on a subject. For example, we used focus groups to explore what values-based compliance means in practice. Focus groups are particularly helpful in gathering background information on an issue. The discussion in a focus group allowed us to generate some initial ideas and identify some of the potential barriers for the rest of the research; for example, we identified that measurement of values was particularly limited.

We followed this with a consultation exercise that consisted of one-to-one interviews, which involved interviewing experienced individuals from various companies, academics, government agencies, professional services and non-governmental organisations. The interviews focused on what values-based approaches mean for people and companies in practice, how they measure it, and the challenges companies face when introducing values into their anti-corruption approaches. In addition, the interviews allowed us to follow up on some of the ideas discussed in the focus groups in more detail, including specific methods for embedding values.

