# *A learning opportunity in transparency implementation*

Rome, *August 2018*

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**Workshop on Human Resources Management & Training – Building organizational resilience**

**OSLO, Norway, 12-13-14 September 2018**

## A learning opportunity in transparency implementation

The Italian regulations on disclosure obligations in the last years have been requesting specific actions to comply as well as suggesting the need for a shift in the organizational behaviours and culture. At first and understandably, the large amount itself of such obligations has caused Istat to focus mostly on compliance, while possibly underestimating the importance of adjustments in the usual ways of thinking and working.

To say that Istat, after understandably focusing on transparency compliance, is now challenged on the side of its organisational culture means that – among other things – it is becoming aware of the difficulty of establishing a steadily shared know-how ("organizational learning")[1] on the subject.

Still getting to such awareness is not easy nor granted: <<(…) learning contexts live within a "self-evident system" which then results in organizational inertia (…) The effect (…) is an interweaving of daily practices, functions and tasks getting a halo of inescapability for people using them on a daily basis (Ciborra & Lanzara, 1999).>>[2]

In the last five years various formal as well as informal initiatives and practices – aiming at both facilitating the knowledge of transparency and disclosure obligations and standardising the plenty of continued actions coming from them – do have been started and shared in Istat.

Among formalised initiatives it is worth mentioning the adoption of an internal provision to implement the Italian Freedom Of Information Act (FOIA) and the setting up of:

- a Team supporting the Head of Anti-corruption & Transparency Management (*Head of AC&TM*);
- the Network of Contact Persons for AC&T;
- two task forces within the directorates mainly involved in disclosure obligations.

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[1] G. Alessandrini, "I processi di condivisione della conoscenza nelle organizzazioni: contesto e apprendimento", in *Riflessioni sistemiche*, n. 5, novembre 2011, pp. 5-12.

[2] G. Alessandrini, *ibidem*, p. 7. My English version.

Among informal initiatives it is worth mentioning:

- the making of a small group monitoring the implementation of Italian FOIA;
- the drafting of operational directions to disclose documents and information on the website.

The main problem in this phase seems to be to get to a steady practice in standardization and to get to a flow of information that doesn't get stuck at any point almost anytime. One year ago, for example, the above-mentioned operational directions (see the last bullet point) were circulated during a meeting. The Network of Contact Persons was asked to disseminate the directions throughout their own directorate/department and to monitor the related implementation.

The following picture shows the requirements for publication that were circulated during the meeting.

# E-mail requirements to make a request for publication

| | |
|---|---|
| ***FROM:*** | any.office.emailaddress@istat.it |
| ***TO:*** | website@istat.it |
| ***CC:*** | website.director@istat.it, head.AC&Tmanagement@istat.it, staffsupporting.AC&Tmanagement@istat.it, directorate.incharge@istat.it, contactperson.directorateincharge@istat.it, anyoneelse.isneeded@istat.it |
| ***SUBJECT:*** | Transparent Governance – Section X – Request for publication |
| ***TEXT:*** | When making a request please consider the following directions:<br>• The request must be sent from a structure (unit/division/directorate) email address (not a personal one)<br>• Specify which file must be uploaded on which link; specify if a new link must be created<br>• Specify if the doc must either be added to existing documents or replace one of them<br>• Specify if either archives must be created or outdated files can be removed<br>• (…) |

Even though such requirements have been formally made known and disseminated, many colleagues have continued to forget, for example, to include all the cc recipients needed for a particular request, as well as to release full information to the website insiders in order to carry out the request properly.

What most frequently is being observed is that any requesting office seems to show a tendency to include as cc recipients (that means, to keep constantly informed) just its head and insiders, forgetting other people **external to the office and yet definitely involved in the process** – and if the related Contact Person is external to the office (and yet belonging to the same directorate/department), he/she is frequently forgotten as well.

As far as the publication details are concerned, it keeps being difficult to get them fully mentioned in a request, as though the website staff is expected to know exactly where any single document must be published on Istat site (among thousands disclosed every year).

It all may seem just a matter of memory but, in such a case, to keep a printout of the picture above under one's eyes might do the trick. Actually, an interesting reluctance to apply the new rules (that means, to change a routine) has been observed, to the extent that, after several informal reminders it has been decided to formally reject any request for publication that turns out not to be fully compliant with the rules agreed. Good solution in the short term, and yet some time is still lost from the first request to the very moment of publication.

The above-mentioned reluctance is just a tiny example of something similar to a "resilience of resistance" to change: *"People identify with **a particular way to work and think:** they tend to identify with the job they do the way they do it. That leads them to emotionally bond with their work and the way they do it."*[3]

[3] My English version.

https://management.closeupengineering.it/resistenza-al-cambiamento-organizzativo/8576/

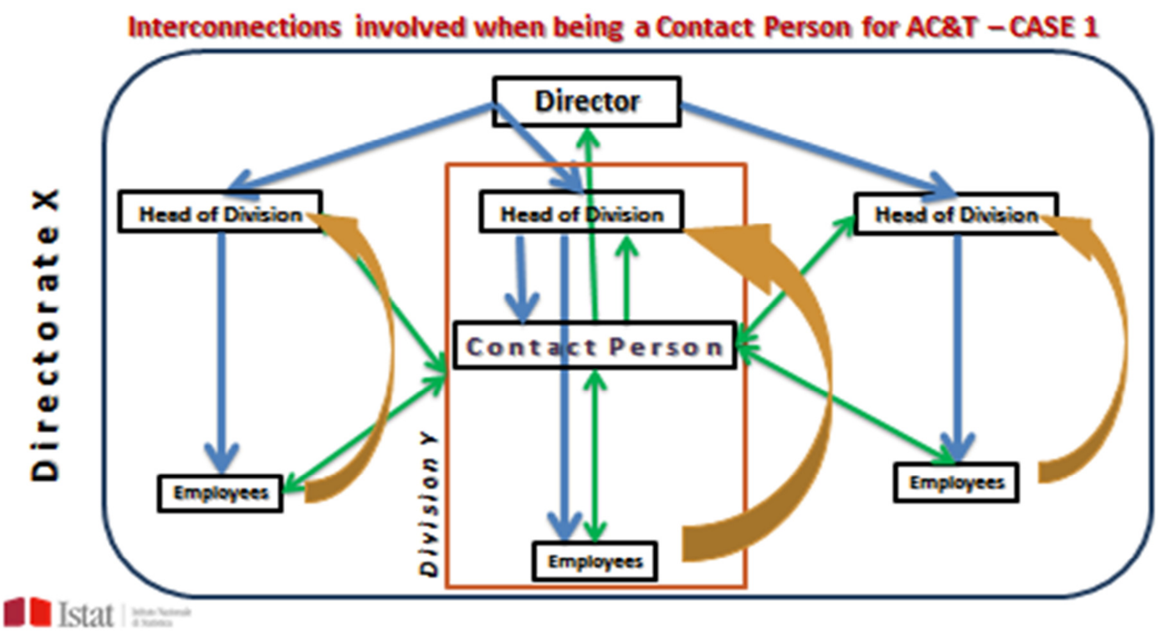
Another interesting example for that can be provided through considering the under-utilization of the above-mentioned Network of Contact Persons for AC&T, a cross-cutting function (so to speak) that has been recommended by the National Anti-corruption Plan since the end of 2013.

The Network must, among other things, keep the Head of AC&TM regularly informed about any disclosure initiatives undertaken by senior managers, as well as contribute to the monitoring as far as their related obligations are concerned.

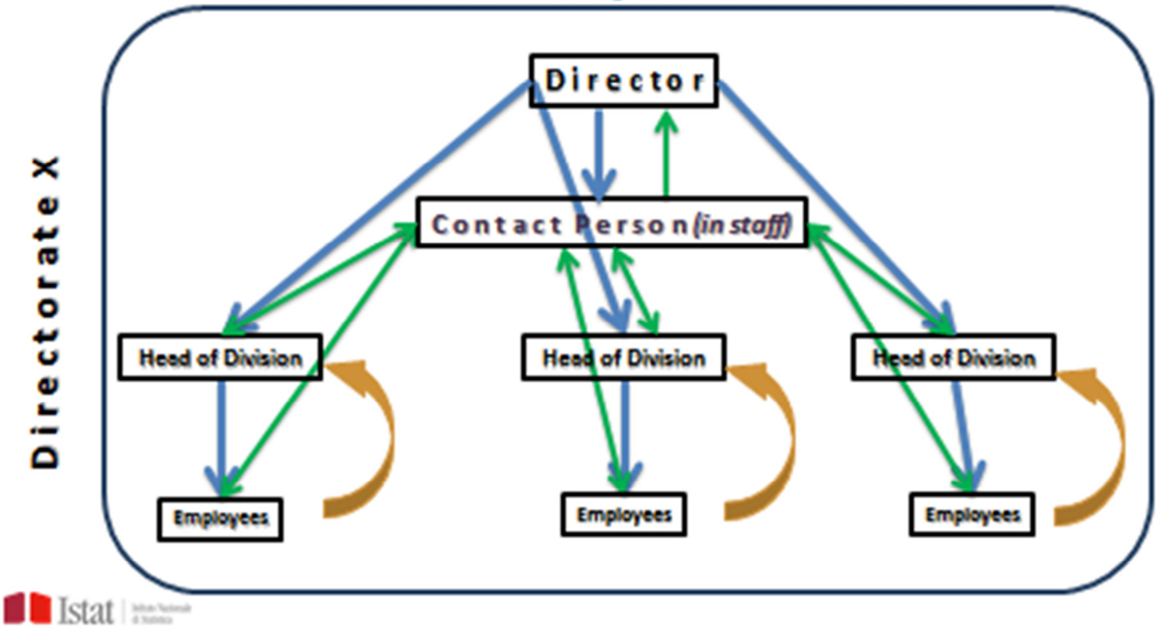
So, the Contact Persons are expected to perform an important role in facilitating connection between the senior managers in charge and the Head of AC&TM, also by ensuring the publication of data, information and documents according to the current legislation. Furthermore, they are free to suggest any qualitative improvement about the data, information and documents subject to disclosure.

Such a connection role and input for compliance activities is also carried out through face-to-face meetings on a regular basis – meetings that can be considered as informal learning settings.

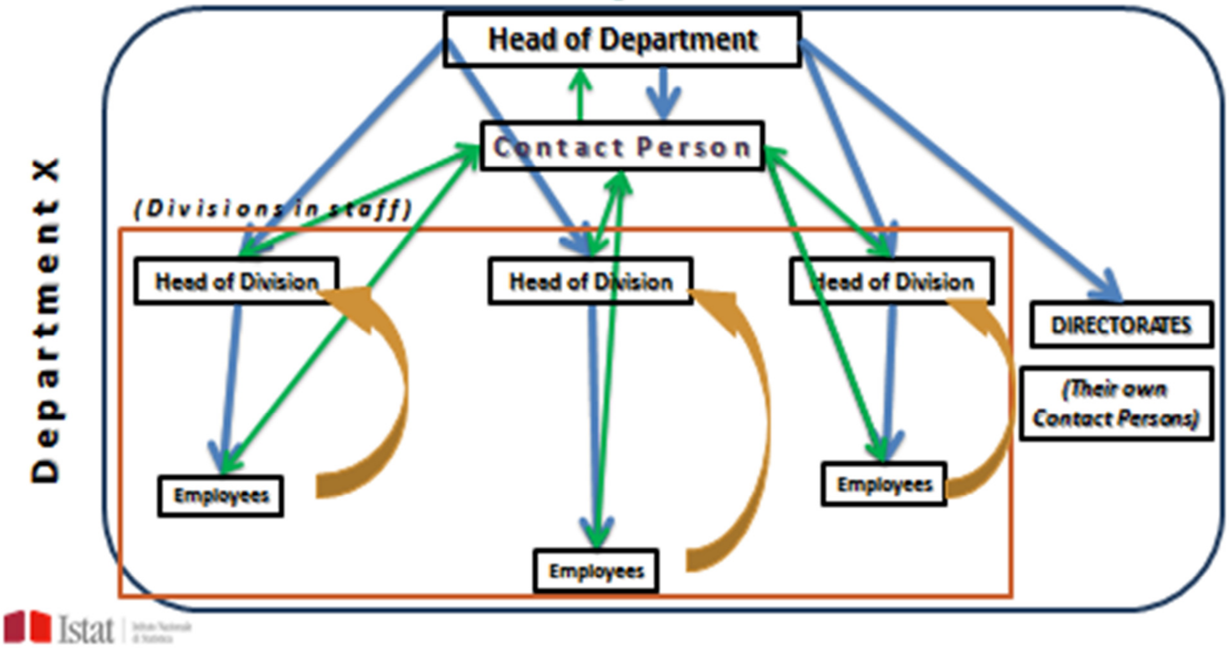
The following pictures show the many interconnections involved in the role of Contact Person for AC&T in Istat:

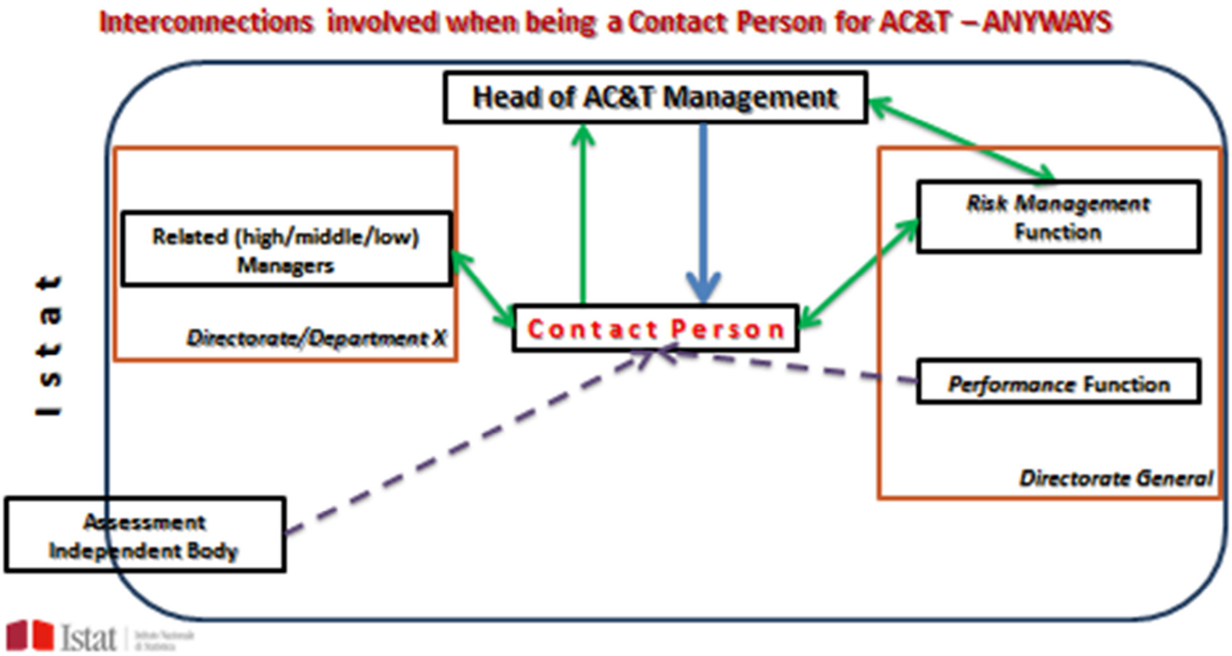


**Interconnections involved when being a Contact Person for AC&T – CASE 2**




**Interconnections involved when being a Contact Person for AC&T – CASE 3**






As mentioned above, the Contact Persons are meant to keep the Head of AC&T Management informed about the status of AC&T obligations within the Directorate/Structure each of them belongs to.

From a hierarchical point of view and considering that most Contact Persons belong to a particular division within a particular directorate, the above actually means that a Contact Person is expected to give inputs (on AC&T) to both his/her Head of division /directorate and his/her colleagues in and out of the division/structure he/she belongs to. It actually means, as well, that such inputs should be welcomed and implemented <u>at all levels</u> of the directorate and its divisions.

Since Istat Network of Contact Persons is mostly composed of people from the low management, what still happens is that they find it difficult:

1) To view their important cross-cutting role as something welcomed, because of an organisational culture that is still hierarchy-oriented. Of course hierarchy is necessary but since AC&T system is rather process-oriented (meaning that it often needs cross-cutting actions), the hierarchical point of view is no longer enough;

2) To access, due to the same hierarchical orientation, the practices and know-hows within the divisions they don't belong to: this lack of knowledge often makes their AC&T inputs far less effective.

*"To avoid any slowing of the innovative drive of a company, it is vital the employees overcome insular thinking. This means they should look* ***beyond their own department borders****, not only focusing on their own tasks but also on the process steps* ***upstream and downstream from themselves****."*[4]

Here UP(stream) and DOWN(stream) do not have the vertical meaning of "high" and "low" of course – they indicate what comes before and after one's own tasks within any process, thus cross-cutting the organizational sectors.

In Istat this sort of well-grounded hierarchical culture is proving resilient in spite of a good implementation of modernization. In order to facilitate the transition to a process-oriented culture (envisaged by both Istat modernization programs and Italian AC&T law), it seems important to invest in:

1) Communication and reiteration: any new rules or directions have to be **fully circulated and repeated over and over** – especially when people in charge turn over;

2) Promoting **the building of a cross-cutting work identity** (far different from a list of profile duties).

The Istat Network of Contact Persons for AC&T can be further trained and better exploited along these lines, thereby getting a relevant connection tool able to give impetus to AC&T enforcement and to modernization as well.

Few closing words about some soft skills to develop for the purpose.

Among other things to communicate effectively, *"The delivery method chosen must suit the circumstances and* ***the needs of both the sender and the receiver****. The content of the message has to* ***resonate and connect****, on some level,* ***with the already-held beliefs of the receiver****. It must contain the information that the employee* ***wants to hear****. It must answer the employee's most (...) cared about questions."*[5]

[4] *Process-oriented thinking*, Signavio, Inc., White Paper, Feb. 2017

[5] *https://www.thebalancecareers.com/communication-in-change-management-1917805* .

Therefore a crucial part could be played, in the long run, by the learning of the ability to customize any communication on the job according to the thought patterns of recipient colleagues/employees, so paying to it the same attention (at all levels) payed to the communication addressed to stakeholders and clients.

Perhaps it is important to understand that such ability is far less a matter of emotional involvement than one of being able to shift among different patterns of thought, expectations, beliefs, values.

When it comes to talk to listening skills in organizational contexts (empathy above all), embarrassment makes its way (in Italy, at least), thus we may forget that successful active listening requires the ability to «see», to visualize (patterns of thought, expectations, beliefs, values) much more than the ability to feel (odd emotions) – <u>especially</u> in organizational contexts.

If communication on-the-job (on a daily basis) throughout an organization fails to access this level of competence, modernization as well as AC&T law implementation will keep resulting in sectoral or adaptive changes (as far as their cross-cutting urges are concerned). And there's a good chance that such changes remain even peripheral.