

# Investigating Ethical Practices in NSOs – Surveys results

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## Abstract

*Improving integrity is a significant concern in the public sector and National Statistical Offices (NSOs), encompassing data ethics and organizational ethics. Studies show that implementing ethics and ethics management within an organization often leads to outstanding performance and is crucial for improving working relationships and overall well-being. Many NSOs already have effective ethics management practices and tools, but there is still a widespread need for conceptual clarity and practical examples when dealing with ethical concerns.*

*The purpose of this paper is to provide a comprehensive summary of the findings of the surveys on ethics management conducted by the Task Team on Ethical Leadership under the coordination of the UNECE HLG-MOS. The paper aims to offer an overview of the various approaches some NSOs employ in handling ethics and describe the tools and policies they have adopted.*

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## Introduction

The Task Team on Ethical Leadership was established in 2021 as a direct result of the Risk Management Framework and related Guidelines, released in 2017 by the Modernisation Committee on Organisational Framework and Evaluation under the coordination of the UNECE HLG-MOS.

The team's primary objective is to develop a Reference Book on Ethics in the National Statistical Offices (NSOs) with the intent to create a common ethical framework and provide a guide to support NSOs in upholding ethical standards and promoting a culture of transparency, accountability, and integrity across all organizational processes and activities, not limited to statistical production and research. To this purpose, the Task Team conducted three surveys in 2021 and 2022 in order to gain valuable insights into effective ethics management practices within NSOs.

This paper highlights the key findings of the surveys, examining the current state of ethical practices within selected NSOs and assessing the extent to which essential tools and procedures for ethical systems have been integrated. This preliminary analysis will serve as a foundation for further discussion and identifying best practices to help develop the Reference Book.

### 1. Business ethics

Business ethics is a broad and encompassing concept that underpins all organizational activities and processes. It refers to the values, principles, and standards that guide the behavior of individuals and groups in an organization. Under this umbrella, organizations are expected to uphold moral and ethical standards in their decision-making and actions, promoting honesty, integrity, fairness, transparency, and accountability across all levels of the organization and all areas of activity, such as administration, communication, support, and production processes.

Studies show that implementing ethics and ethics management within an organization often leads to outstanding performance. Organizations that apply ethical practices are more likely to cultivate trust with employees and stakeholders, leading to increased loyalty and support. Additionally, organizations that uphold ethics are more likely to attract and retain skilled employees, as workers are more engaged and motivated. This can lead to higher productivity, innovation, and overall job satisfaction, which in turn can contribute to excellent organizational performance.

Employees need to be able to identify ethical issues in their work, develop the necessary cognitive tools to make ethical decisions and receive unwavering support from the organizational environment when making those choices. Hence, organizations need to establish a robust and efficient ethical system to provide employees with clear guidance and support in ethical matters. This system should be built upon a solid framework and a recognized program, ensuring that ethical standards and principles of conduct are well-defined and effectively communicated to all employees.

The ethics management system should include ethics training, communication channels, advice lines and offices, and tools such as anonymous reporting systems for reporting misconduct. Yet, simply creating a formal system does not guarantee effective ethics management. In fact, for a formal system to influence behavior, it should also be integrated into a broader, coordinated, and coherent cultural system that consistently promotes ethical conduct. By fostering a comprehensive ethical framework and cultivating an ethical culture, organizations can create a professional and morally sound environment that encourages ethical conduct on a daily basis.

## 2. Surveys

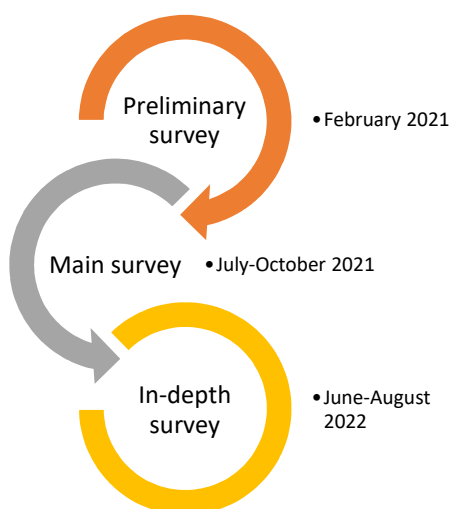
The Task Team conducted three surveys at different intervals to gather information from interested NSOs. These surveys aimed to assess how NSOs incorporated the main tools used in ethical systems within their organizations.

The surveys were conducted in 2021 and 2022 and were constructed gradually. The questions were posed progressively, increasing the analysis's details and depth.

### 2.1 Preliminary survey

The preliminary survey was conducted in February 2021 to gather initial information that helped develop the subsequent surveys.

Figure 1 - The three surveys



The primary focus of the questionnaire was to understand the extent to which NSOs had implemented policies, procedures, and programs related to ethics management. Additionally, the survey aimed to evaluate their interest in participating in upcoming surveys exploring successful ethics management practices from NSOs that have either developed or were developing such practices. Accordingly, the questionnaire consisted of six simple and generic questions.

The preliminary survey was distributed to as many NSOs as possible to facilitate participation and collect many experiences. Out of all the NSOs that were contacted, a total of 29 responded by promptly returning the questionnaire<sup>1</sup>.

### 2.2 Main survey

Between July and October 2021, the Task Team submitted the main survey to investigate the ethical tools and procedures implemented by NSOs to manage ethics in both statistical production and research, and organizational processes.

The survey focused on three key areas. First, it examined Ethics Policies and Organizational models, including aspects such as the presence of a Code of Ethics, the existence of an Ethics Committee, and the processes employed to investigate ethical breaches. Second, it delved into ethical strategies and practices, specifically focusing on the ethical review of statistical projects, which ensures that ethical considerations are taken into account during the planning and execution of statistical projects. Lastly, the survey explored Training on Ethics, aiming to determine whether NSOs have implemented training programs to enhance ethical awareness and understanding among their staff. Out of the 65 NSOs approached, 45 completed the survey<sup>2</sup>.

### 2.3 In-depth survey

An extensive follow-up survey was conducted from June to August 2022 to investigate the suggestions derived from analyzing the responses received in the previous two surveys. The survey was sent to the NSOs

<sup>1</sup> The preliminary survey collected responses from Australia, Belgium, Brazil, Canada, Chile, Colombia, Costa Rica, Czech Republic, Denmark, Finland, Greece, Ireland, Italy, Kyrgyz Republic, Lithuania, Luxembourg, Poland, Republic of Armenia, Republic of Belarus, Republic of Bulgaria, Romania, Serbia, Slovak Republic, Slovenia, Sweden, The Netherlands, Turkey, UK, and Ukraine.

<sup>2</sup> The main survey collected responses from Albania, Argentina, Australia, Austria, Belgium, Canada, Colombia, Costa Rica, Croatia, Czech Republic, Ecuador, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Japan, Kazakhstan, Kyrgyz Republic, Latvia, Lithuania, Luxembourg, Malta, Mexico, New Zealand, Poland, Republic of Armenia, Republic of Azerbaijan, Republic of Belarus, Republic of Bulgaria, Republic of North Macedonia, Romania, Russia, Serbia, Slovak Republic, Slovenia, Sweden, The Netherlands, Turkey, UK, Ukraine, and Uzbekistan.

that participated in the previous survey and confirmed that they had already implemented the ethical policies and measures analyzed. Of the 45 NSOs contacted, 25 responded by returning the questionnaire<sup>3</sup>.

The NSOs were divided into three groups and asked different questions based on their previous responses. The survey focused on four key areas crucial in promoting ethical practices within an organization (Figure 2).

Figure 2 – Focus areas of the in-depth survey



- The first area of focus was Ethics and Compliance Governance. This section delved into the establishment of business ethics values and the allocation of performance objectives directly linked to the implementation of ethical standards.
- The second area of emphasis was Ethics dissemination and implementation tools. This section explored the methods used to educate employees on the Code of Conduct and the development of a whistleblowing channel.
- The third area of examination was Ethics Management Organization. This section focused on implementing a dedicated Ethics/Compliance Officer and their organizational role.
- Lastly, the survey explored the Ethics Management Process. This section assessed the existence of a due diligence procedure and a risk assessment.

### 3. Surveys results

The survey findings offer valuable insights into the ethical practices and procedures adopted by NSOs worldwide, providing a comprehensive overview of the current state of ethical practices within them.

All the surveys yielded positive results, with a high response rate from the recipients, highlighting the strong interest of NSOs in this subject. The overall responses aligned with the results gathered in the first preliminary survey, which showed that nearly 72% expressed keen interest in the Task Teams' work, and approximately 67% expressed their willingness to participate in future surveys.

The analysis emphasizes the prevalence of ethics management in various NSOs that successfully implemented ethical practices through diverse methods and tools, such as strategic initiatives, processes, structures, and inclusive training programs. The findings are presented based on six key areas to provide a framework for assessing effectiveness and adherence to ethical standards:

- Ethics and Compliance Governance: this section examines the extent to which organizations have established robust governance frameworks that promote ethical decision-making and behavior.
- Ethics Management Organization: this section explores the structures and processes that enable organizations to manage ethical practices effectively. This includes investigating the presence of dedicated ethics departments or committees as well as the allocation of resources to support ethical initiatives.

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<sup>3</sup> The in-depth survey collected responses from Albania, Armenia, Australia, Austria, Belgium, Canada, Colombia, Costa Rica, Czech Republic, Estonia, Eurostat, Finland, France, Hungary, Italy, Kazakhstan, Kyrgyz Republic, Latvia, Lithuania, Malta, Mexico, New Zealand, Slovak Republic, Turkey, and Ukraine.

- Ethics implementation procedures and tools: this section describes organizations' methods and tools for implementing and monitoring ethical practices, such as protocols for investigating breaches and risk assessment procedures.
- Ethics dissemination: this section deals with NSOs' methods for effectively communicating and promoting their ethical values and policies inside and outside the organization.
- Ethics Management and Performance: this section investigates whether NSOs prioritizing ethics have improved NSOs' performance, employees' satisfaction, and well-being.
- Ethical Dilemmas: this section explores the types of ethical challenges that organizations face and how they navigate these complex situations.

### 3.1 Ethics and Compliance Governance

Ethics Governance refers to the principles, practices, and policies guiding an organization's decision-making processes. Its primary objective is to foster a culture of integrity, transparency, accountability, and social responsibility. A shared and transparent ethical framework serves as a guide and a constant reminder of the organization's commitment to upholding the highest ethical standards, ensuring everyone is fully aware of their responsibilities and obligations at all levels.

In the exploratory survey, among the responding NSOs, approximately 83% confirmed that their organization already had established Ethical management policies, programs, procedures, or practices. Of these, 88% implemented these measures over three years ago. However, when exploring these aspects, it appears that NSOs mainly refer to data Ethics documents. In fact, according to the in-depth survey, only 9 NSOs have developed comprehensive formal ethics programs.

#### Strategic Values

Any organization needs to establish strong value statements within its strategic goals. A values statement provides a concise summary of the organization's principles, the values that its employees are expected to uphold, and the contributions its activities aim to bring to society. As also recognized by the CES Task Team on core values in their work presented at the 2022 Conference of European Statisticians in February 2022, in NSOs, as in any ethical organization, these statements become ingrained principles that guide and support decision-making and interactions with governments, society, and other stakeholders.

In the in-depth survey, about 80% of participants answered positively when asked if the NSO's vision, governance, or leadership statement considers an ethical perspective. Sometimes, the NSOs explicitly cite ethical and professional principles in their vision and mission statements. Other times, they refer to the Fundamental Principles of Official Statistics. In some cases, the NSOs declare that they promote and respect ethical practices, but there is no explicit mention of the word "ethical" in their strategic documents.

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**Q.: Do any Vision, Governance, and Leadership statements in your Organisation take into account ethical perspective?**

~ \* ~

A.: *"We do a lot of what ethics is without calling it ethics."*

A.: *"The emphasis of the NSO's mission statement is on statistical production and the many ways this can serve policymakers, researchers, and the wider public. That said, the core values [...] connect to the pursuance of the highest ethical standards in statistical and dissemination processes."*

A.: *"Geared to satisfying society's information needs, official statistics shall be based upon a clear set of principles that are aimed at maintaining the quality of statistics and at retaining the confidence of end users and providers of information in statisticians and statistical agencies."*

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*Source: In-depth survey*

## Codes of conduct and Codes of ethics

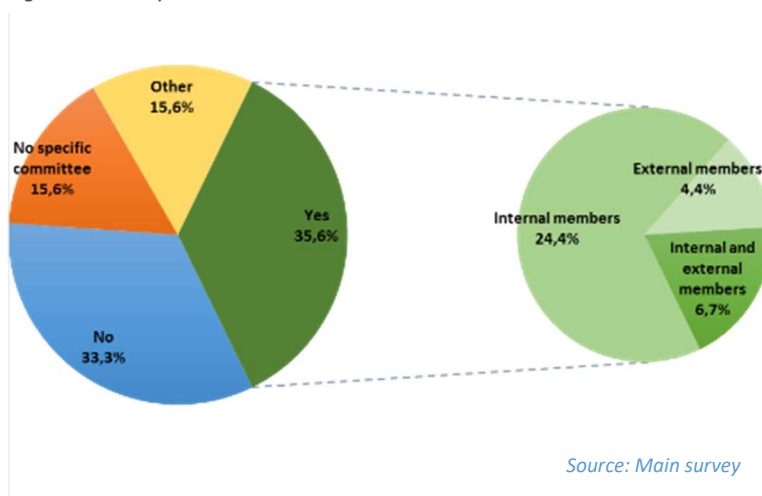
The Code of Ethics and the Code of Conduct are other crucial tools for creating solid ethics policies in an organization. A Code of Ethics consists of general principles that promote ethical behavior among employees. It communicates an organization's values and helps guide its leadership's choices. A Code of Conduct is a written set of principles and policies that usually specify the organization's values statement. It includes specific standards of conduct expected in various realistic situations, offering employees a framework to navigate complex scenarios. It guides all employees, ensuring they understand what is acceptable and unacceptable regarding workplace behavior.

Interestingly, according to the main survey results, 73% of responding NSOs have developed or are developing their Ethical Code or a similar document outlining their employees' expected ethical behavior. However, the in-depth survey responses indicate that the documents these NSOs refer to are only partially the Code of Ethics and the Code of Conduct. Instead, they primarily include Fundamental Principles of Official Statistics and Data Ethics Codes or refer to the Ethical Code of Civil Servants. About 20% have a Code of Ethics, and 24% have a Code of Conduct.

### 3.2 Ethics Management Organization

One highly effective tool for managing ethics within an organization is establishing specific and dedicated roles, such as an Ethics Committee and a dedicated Ethics/Compliance Officer. These structured functions are a point of reference for all employees and are responsible for implementing and administering an ethics management program, ensuring the application of ethics policies and procedures, overseeing training initiatives, and resolving ethical dilemmas.

Figure 3 - Does your NSO have an Ethics Committee



Source: Main survey

According to the main survey findings, approximately 36% of respondents reported having a dedicated Ethics Committee within the NSO. This committee consists of members who are either internal to the organization (24%), external and independent (4%), or a combination of both (7%). When ethical issues are assigned to existing offices without creating a specific structure, the percentage rises to 77% (Figure 3).

According to the in-depth survey, 8 out of 14 NSOs also have a dedicated Ethics/Compliance Officer or a similar

role responsible for managing ethics. These officers usually work closely with the Ethics Committee and provide regular reports to the Director General of NSOs and sometimes to an external National Commission of Ethics as well.

The Committees and the Offices engage in activities such as:

- Promote knowledge, understanding, and adherence to ethical values and Codes.
- Conduct studies related to the ethics system and suggest necessary adjustments.
- Provide advice and recommendations on practical situations where ethical issues arise and serve as a consultative and specialized advisory body for applying the Code.
- Receive reports of ethical violations committed by workers and provide recommendations.
- Identify the need for ethical training, develop training programs, and conduct staff training on ethical behavior.
- Implement the development of ethical plans and other programs to meet ethical requirements.

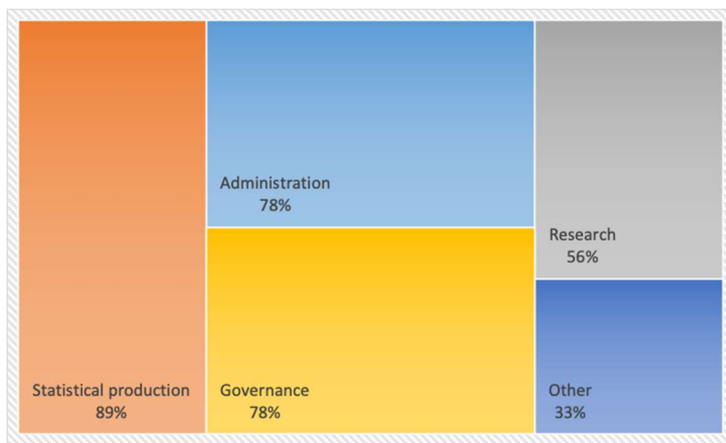
### 3.3 Ethics implementation procedures and tools

Applying ethical procedures and tools is also crucial for cultivating an ethical culture within organizations. Guidelines, protocols, and assessment methods serve as a roadmap, guiding individuals at all levels of the organization to practice ethical behavior as they provide clear indications to recognize and investigate breaches or ethically review new projects. The tools used to report violations and assess ethical risks are equally vital since they permit to face and mitigate real or potential ethical risks.

#### Protocols to investigate ethical breaches

Ethical breaches occur when there is a deviation from accepted practice or a violation of ethical rules and procedures. However, not all instances of misconduct are necessarily considered ethical breaches. Therefore, it is highly beneficial to establish a well-defined protocol for handling allegations of suspected breaches and addressing confirmed violations. Clear and transparent procedures facilitate recognizing and reporting ethical misconduct and gathering proper evidence for investigations. Moreover, they enable organizations to assess whether an ethical breach has occurred, determine the extent of the violation, and recommend appropriate subsequent actions.

Figure 4 – Areas covered by procedures to investigate ethical breaches



Source: Main survey

The main survey indicates that almost 80% of NSOs do not face significant ethical violations. However, it appears that while most of these organizations established a Code of Conduct (69%), none implemented procedures to investigate ethical breaches. Conversely, almost all organizations that faced misconduct (8 out of 9) have an Ethical Code and a protocol to investigate violations of ethics.

These NSOs investigate ethics breaches through various means. Information is usually collected by receiving complaints regarding ethical norms and rules violations.

In a specific case, additional investigations are carried out through a census distributed to all employees to gather the information that will enable the establishment of new working plans and ethics programs, as well as workshops to understand staff perceptions regarding values and other ethical topics.

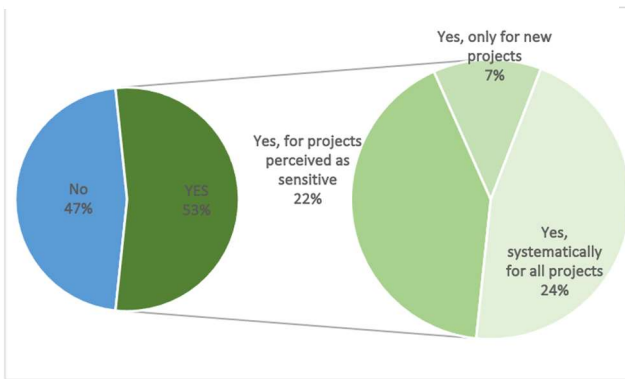
Considering the 9 NSOs that reported policies on ethical breach management, these concern different areas, such as the statistical production area (89%) and the administration (78%) and the governance areas (78%) (Figure 4).

#### Ethical Reviews of Projects

According to over half the respondents, their NSOs' in-house projects undergo ethical reviews; among them, such assessment occurs regularly (Figure 5).

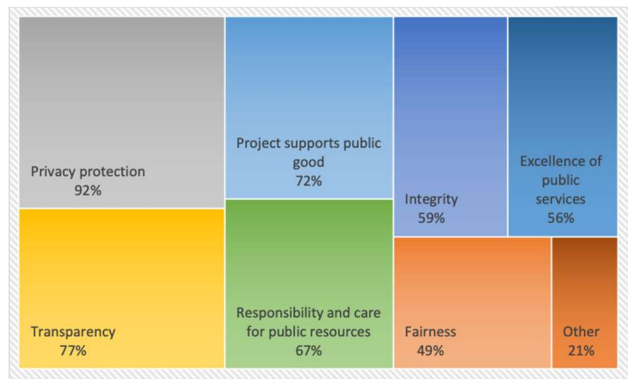
Personal data protection, transparency, and public good support have been reported as the central values to consider before deciding whether to start a project or a data acquisition. Integrity and upholding the highest ethical standards have been included among such central values by 59% of the NSOs (Figure 6).

Figure 5 – Does your NSO conduct Ethical Reviews on projects?



Source: Main survey

Figure 6 – Values considered in projects Ethical Reviews



Source: Main Survey

### Risk management

Organizations can proactively anticipate and address potential misconducts by adopting risk management practices. Risk management is the process of identifying, assessing, and prioritizing potential risks that may affect the achievement of any organizational goal. It involves analyzing the likelihood and impact of various risks and developing strategies to avoid or mitigate their negative consequences. Risk management is a valuable tool for ethics management because it helps navigate and address potential challenges even during organizational changes, ensuring a smooth transition.

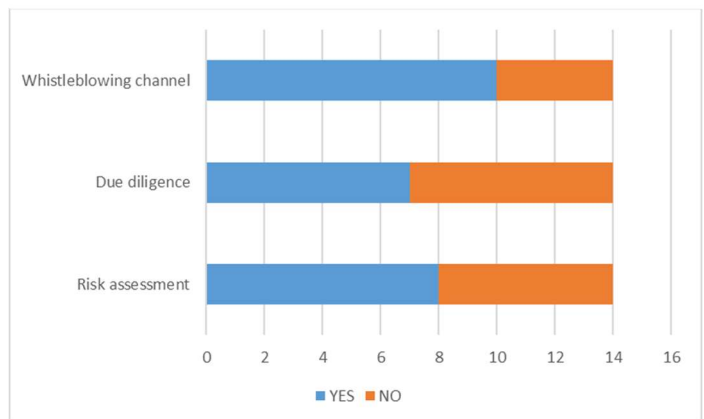
The in-depth survey findings suggest that most interviewed NSOs (57%) have implemented a risk management methodology within their institutional processes. These procedures often include audits to ensure thoroughness (Figure 7).

The primary focus areas in risk assessment are compliance with legal requirements and preventing fraud and corruption. Notably, two NSOs have successfully obtained ISO certifications, including ISO 9001:2015, ISO 27001:2013, and ISO 37001:2016, which is a testament to their successful implementation of risk management practices.

### Due diligence

Due diligence is an essential tool to reinforce controls that counter unethical practices. By conducting thorough due diligence, organizations can effectively identify and mitigate potential risks associated with unethical behavior. Due diligence is a meticulous research and analysis process that organizations perform to thoroughly assess the integrity and reputation of partners, suppliers, and other stakeholders before engaging in business relationships that may expose the organization to legal, financial, or reputational harm.

Figure 7 – Tools used by NSOs to assess ethics



Source: In-depth survey

In addition to its risk mitigation benefits, due diligence fosters a culture of integrity and trust internally and externally in the eyes of stakeholders and the wider community. By thoroughly examining potential partners' backgrounds and records, organizations can ensure alignment with their values and ethical standards.

Remarkably, 50% of respondents conduct due diligence assessments for all third parties as an integrated process in all calls for tenders, contracts, and grant agreements (Figure 7). Moreover, a selected few also



extend this practice to the recruitment process, ensuring that the attitude and background of potential candidates align with the organization's core values.

### Whistleblowing

Whistleblower channels have become an increasingly important and widely used tool to develop an ethical conscience across organizations worldwide. Whistleblower channels enable individuals to report illegal or unethical behaviors while remaining anonymous and protecting them from potential harm or discrimination. Creating a safe and confidential platform encourages more informants to step forward and expose misconduct without fearing negative consequences in their personal and professional lives. Furthermore, these channels serve as practical tools for collecting essential information, as they are specifically designed to investigate reports, ensuring they are handled appropriately.

According to in-depth survey results, 71% of NSOs have implemented safe and confidential reporting channels for disclosing workplace misconduct (Figure 7). These systems were primarily introduced in the early 2000s to comply with the national law concerning the Public Civil Servants Disclosure Protection Act. Despite their widespread implementation, most NSOs have not yet received any reports through these channels.

### 3.4 Ethics dissemination

To foster a healthy and competitive environment that benefits all parties involved, organizations should engage in fair and transparent practices with employees, customers, suppliers, and competitors. Regular communication, ongoing training, and stakeholder engagement campaigns are essential to this process. These efforts not only promote transparency and accountability but also instill a sense of trust and confidence in the organization's unwavering commitment to ethical behavior.

### Ethics Training

Comprehensive and continuous ethics training is crucial in creating awareness about the significance of ethics in the workplace and fostering a culture of integrity and accountability in the organizational culture because it empowers employees to make ethical decisions and hold others accountable. The training should cover the fundamental principles of ethics and provide a detailed understanding of the organization's ethics policies and procedures.

Figure 8 – Target audience of training on Ethics

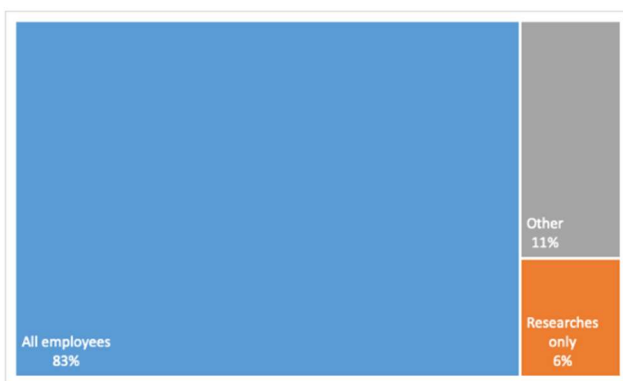
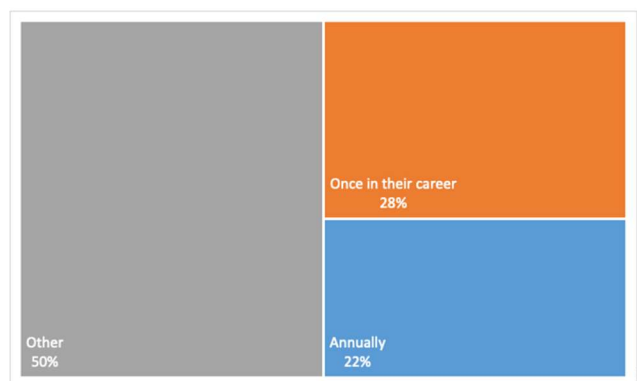


Figure 9 –Frequency of training on Ethics



Source: Main survey

According to the main survey, around 80% of respondents reported having specific training courses on ethics for all employees (Figure 8). This shows that many NSOs are paying attention to this issue. However, in most cases, such training is only offered occasionally: it is usually provided to recruits or employees involved in new projects and is delivered only once during their employment. Approximately 22% of these organizations conduct annual ethics training (Figure 9), which is primarily voluntary.

## Stakeholder consultation

By actively involving stakeholders through consultations to gather their insights and feedback, organizations can align with the community's expectations and values. This inclusive approach helps identify potential ethical concerns and enables organizations to address them, proactively reducing the risk of reputational damage. As a result, it strengthens relationships with stakeholders, fostering long-term trust and credibility.

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**Q.: Does your Organisation run any stakeholder consultation to promote reputation and reliability based on the development of Ethics?**

~ \* ~

*A.: "There is a process for suggestions and complaints in charge of the Institutional Management, whose purpose is for users to express their disagreements about behaviors or situations that they observe regarding institutional personnel in the performance of their duties, or in the delivery of institutional products (goods and services)."*

*A.: "When we consult our stakeholders, the ethical elements of our work are always present."*

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*Source: In-depth survey*

To establish themselves as reliable entities and improve their reputation, 50% of the respondents engage in external stakeholder consultations regarding ethical development. These consultations typically focus on projects that are considered high-priority, strategic, or sensitive. Consultations may involve participation from citizens or groups representing various stakeholders. In some instances, external consultants or experts may also be engaged. In one case, an NSO conducted a study to gauge the perception of ethics within the organization, too.

## 3.5 Ethics Management and Performance

As already mentioned, implementing ethics and ethics management within an organization often leads to outstanding performance. It appears from the in-depth survey that most of the respondents from the NSOs recognize the positive impact of ethics management on employees' well-being and performance. According to the in-depth survey, 68% of the 25 respondents acknowledged that Ethics management has significantly improved working relations and overall well-being, while 60% agreed that it has improved performance.

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**Q.: On the basis of your experience, has the Ethics management increased the performance of your Organisation?**

~ \* ~

*A.: "This has not been analyzed explicitly. Employees are informed as soon as they begin their employment of the frameworks and policies in place. Transparency is also demonstrated to the general public with the website. With these proactive actions the performance we can assume performance is better compared to a reactive mode."*

*"We are confident that Ethics management, using the set procedures ensuring transparency, will improve the wellbeing of all staff."*

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*Source: In-depth survey*

However, none of the respondents implemented a monitoring system or a specific analysis within the organization to provide concrete evidence and enable a more accurate assessment of the impact of Ethics management on the workplace.

### 3.6 Ethical Dilemmas

Ethical dilemmas are complex situations that arise when individuals face conflicting values and principles, making it challenging to determine the appropriate course of action. To make ethical decisions, individuals must carefully consider the potential consequences of their actions and balance competing moral obligations. This involves considering the organization's ethical framework and its Codes of Conduct while embracing transparency and accountability in their choices.

Regarding ethical dilemmas, in the in-depth survey, most NSOs expressed concerns regarding data ethics, with confidentiality and data privacy being the most mentioned areas. Five organizations explicitly mentioned organizational ethical dilemmas. Among them, the most frequently mentioned concerns revolve around merging positions, conflicts of interest, integrity, general corruption risks, compliance with professional ethics rules beyond the office environment, and the tension between public interest and protecting private or business interests.

## 4. Conclusions

Overall, the three surveys the Task Team on Ethical Leadership conducted indicate that numerous NSOs have implemented robust measures to manage ethics, demonstrating a solid commitment to ethical practices. The high response rate, the willingness of NSOs to participate in the surveys and future information activities, their actual commitment to ethical practices, demonstrate their active engagement and desire to contribute to developing best practices in this area.

The analysis reveals that many NSOs have widely adopted ethics management practices. These organizations excel in implementing ethical practices through various means, such as strategic values, streamlined processes, organizational structures, and efficient tools. Given the nature of their work, most NSOs primarily focus on data ethics and the quality principles applied to statistics. Nonetheless, while this focus is essential, several NSOs also acknowledge the need for further development of business ethics to establish a comprehensive ethics management system extending beyond statistical production and research.

Continuous improvement and evolution of ethical frameworks can actually enable NSOs to effectively address emerging ethical challenges and fulfill their mission of providing accurate and reliable data to the public. And the insights collected from the surveys can serve as valuable starting point for stimulating further discussion, raising awareness, and generating increased interest among NSOs concerning ethics management practices.

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