Managing Integrity or Reporting Compliance? Analysing Integrity Plans as Organisational Instruments in Romanian Public Administration

Alexandra Mirela Kiș, Mihaela Apostol and Teodor Iulian Gheorghe
National University of Political Studies and Public Administration, Bucharest, Romania

kismirela1808@gmail.com
mihaelaapostol@hotmail.com
gh_teodor@gmail.com

Abstract: Public integrity has become a central concern in contemporary governance, with increasing emphasis placed on the ability of public institutions to move beyond formal compliance and foster values-based ethical environments. Within national anti-corruption strategies, integrity plans operate as institutional instruments through which integrity requirements are translated into organisational practice. This paper examines the extent to which integrity plans developed by Romanian public institutions operationalise public integrity through compliance-based or values-based approaches, building on the distinction advanced by the Organisation for Economic Co-operation and Development between rule-based and values-based integrity strategies. Within this framework, the study positions integrity plans as intermediary instruments that connect strategic anti-corruption frameworks with institutional practices. The research adopts a document analysis of a purposive sample of five entities, comprising central public institutions, a regulatory authority, a local government entity and a state-owned enterprise. The sample is selected according to institutional type, exposure to corruption risks and the public availability of the analysed integrity plans. The study is exploratory in scope and examines the formal design of integrity measures within the plans. The analysis follows four stages: identifying integrity plans within the 2021-2025 strategic cycle, extracting integrity measures, coding these measures according to their operational orientation, compliance-based or values-based, and examining the associated indicators and verification mechanisms. The paper treats integrity plans as formal documents in which institutions articulate how integrity is to be operationalised at organisational level. By analysing the balance between compliance-oriented and values-oriented measures, the study contributes to a clearer understanding of how integrity is formally designed within Romanian public administration. The contribution of the paper lies in conceptualising integrity plans as a distinct analytical entry point for understanding the relationship between formal governance frameworks and organisational practices. In doing so, it highlights the extent to which the formal design of integrity instruments remains anchored in compliance or moves towards more substantive, values-driven models, with implications for public sector governance and integrity policy design.

Keywords: Public integrity, Integrity plans, Compliance-based approach, Values-based approach, Anti-corruption strategy, Romanian public administration

1. Introductory Remarks

The fight against corruption is not an exclusive attribute of modernity (Kroeze, Vitória & Geltner, 2017). Philosophers such as Plato, Aristotle and Machiavelli addressed this phenomenon, framing it as the exercise of power by rulers in pursuit of their own interest at the expense of the common good (Miller, 2023). Although the language used to describe the phenomenon has become more precise, its underlying meaning has remained broadly constant. International organisations today converge on a similar formulation. Transparency International (n.d.a) and the World Bank both define corruption as “the abuse of entrusted power for private gain” (Bajpai & Myers, 2020). Corruption has remained on the agenda because of its effects, which include the erosion of public trust, the inefficient management of public resources and constraints on economic growth (OECD, 2026; Bajpai & Myers, 2020).

These effects have led states to develop national responses to corruption. Romania joined this effort in 2001 with the adoption of its first National Anti-Corruption Strategy, a programmatic document setting out measures to prevent and reduce corruption at the national level (Transparency International Romania, 2012). The strategies adopted in the following decade operated within a paradigm centred on the detection, control and sanctioning of corruption. Over time, however, this paradigm came to be regarded as insufficient. The Organisation for Economic Co-operation and Development (OECD) consolidated this concern in 2017 through the Recommendation on Public Integrity, proposing “a strategic and sustainable response to corruption […] public integrity” (OECD, 2017).

Romanian strategies adopted in subsequent cycles followed the same direction, introducing prevention-oriented measures alongside existing control-based ones. Within this trajectory, the most recent strategy, covering the period 2021-2025, includes integrity plans as instruments through which Romanian public

institutions translate the requirements of the national strategy into measures adapted to their own organisational context.

These instruments form the object of the present paper. The paper examines how public integrity is articulated within the integrity plans adopted by Romanian public institutions, through the measures included in these documents. This reading is informed by the distinction the OECD (2020) draws between rule-based and values-based approaches in the Public Integrity Handbook, where it recommends a balance between the two as the basis for any integrity strategy. Although integrity plans are part of the Romanian strategic architecture, they have not been examined as a research object in their own right through this distinction. The paper addresses this gap by asking whether the plans, as formally designed, function as instruments of organisational integrity management in the sense advanced by the OECD (2020), or as documents through which institutions discharge their obligations under the national strategy.

The remainder of the paper develops the theoretical background, outlines the research design, presents the findings and discusses the implications, limitations and directions for future research.

2. Theoretical Background

The literature distinguishes between multiple forms of integrity, and the generic use of the term carries certain risks. As Audi & Murphy (2006) observe, “when integrity is conceived as morally sound character, it has at least as many facets as there are moral virtues”. The breadth of the term creates the possibility for individuals to invoke moral standards that serve particular interests, which makes it necessary to associate integrity with specific virtues such as honesty or fairness (Audi & Murphy, 2006). Beyond the general meaning of integrity as “the quality of being whole and complete” (Cambridge Dictionary, n.d.), the public sector has developed a more delimited understanding of the concept, anchored in the protection of the public interest. Transparency International (n.d.b) identifies integrity with adherence, at both institutional and individual levels, to a set of ethical standards and principles. In the field of governance, the OECD has offered one of the most influential definitions, framing public integrity as “the consistent alignment of, and adherence to, shared ethical values, principles and norms for upholding and prioritising the public interest over private interests in the public sector” (OECD, 2017). This definition frames integrity as a positive standard for public action.

Once integrity is understood in these terms, the question of how it is to be managed within organisations becomes central. Two main approaches have been distinguished in the literature. Paine (1994) was among the first to articulate this distinction, contrasting a compliance-based strategy with an integrity-based strategy. The compliance-based strategy seeks to prevent, detect and sanction misconduct by aligning individual behaviour with externally imposed rules. Its underlying model is one of deterrence, where individuals are conceived as rational actors guided by material self-interest. By contrast, the integrity-based strategy rests on the premise that individuals are social actors whose conduct is shaped by values, ideals and the influence of peers, and that ethical behaviour is sustained by internal commitment rather than by external constraints alone. The two strategies are not mutually exclusive. Integrity-based initiatives typically retain compliance components such as codes of conduct, training and audits, but embed them within a broader framework oriented towards responsibility and self-governance (Paine, 1994).

The OECD (2020) has incorporated this distinction into its policy documents, presenting the balance between rule-based and values-based approaches as a central challenge for integrity strategies. This balance is important because it enables an organisational environment that not only discourages misconduct but also encourages ethical conduct (OECD, 2020). The two approaches are therefore best understood as complementary, since compliance and integrity can reinforce one another through positive synergies (Calderón, Piñero & Redín, 2018). A balanced integrity strategy combines mechanisms aimed at preventing and limiting misconduct with measures that strengthen moral awareness and ethical conduct, since both rule-based and values-based strategies are relevant for reducing violations and for supporting awareness (Huberts, 2018).

The complementarity of the two approaches is well established at the level of principles. Less attention has been paid, however, to how this balance materialises within the instruments through which integrity policies are implemented. In practice, integrity reforms have often concentrated on policies, procedures and control institutions added on top of the existing institutional architecture. The result, over time, has been a crowded organisational environment in which public organisations consume resources to respond to obligations of formal compliance rather than to integrate integrity, understood as a value, into institutional practices (Evans, 2012). Evans (2012) refers to this tension as the integrity paradox, the dissonance between formal reform,

composed of rules, codes and procedures, and the degree to which norms and values are internalised at the organisational level.

This tension also appears in the literature on organisational integrity. Kayes, Stirling & Nielsen (2007) describe this construction as “an enormous task”, since “no one-size-fits-all program exists” that can be transferred across organisations. Kirby (2021) takes the argument further by proposing an “institution-first” approach, based on the idea that public officials “embody” the institutions within which they operate. From this perspective, organisational integrity is the capacity of an institution to pursue its purpose in accordance with the commitments it has assumed, while the integrity of those acting within the institution is the disposition to support that institutional ideal (Kirby, 2021).

This difficulty makes the instruments through which national integrity strategies are translated into organisational measures relevant. One such instrument, central to the present study, is the integrity plan, a document through which a public institution sets out the measures it has identified as remedies for the corruption risks present within its activity (Government of Romania, 2021). These instruments must be situated within the broader evolution of Romania’s anti-corruption framework, which developed in close connection with the country’s European Union accession process. During this period, concerns were raised at European level regarding the need to strengthen measures against corruption, including within public administration (Commission of the European Communities, 1997). In this context, Romania requested a diagnostic study from the World Bank, whose findings informed the elaboration of the first National Anti-Corruption Strategy in 2001. Five further strategies followed, the most recent of which, covering the period 2021-2025, consolidates integrity plans as instruments. Although integrity plans are part of the Romanian strategic architecture, they have not yet been examined as a research object in their own right through the rule-based and values-based distinction set out by the OECD (2020). The remainder of the paper takes up this examination.

3. Research Methodology

This study examines how public integrity is articulated within the integrity plans of Romanian public institutions. The research is framed as an exploratory study, focused on identifying initial patterns in how integrity is articulated within these documents, rather than supporting statistical inference. The analysis uses the OECD distinction between rule-based and values-based approaches to integrity (OECD, 2020) to classify the measures included in the plans, not to assess the overall integrity orientation or integrity culture of the institutions that adopted them.

On this basis, the research question is whether the integrity plans analysed operationalise public integrity through compliance-based or values-based measures. In line with this question, the working hypothesis is that Romanian integrity plans rely more on compliance-based measures than on values-based ones.

To address this question, the study uses document analysis. Integrity plans are documents in which each institution sets out the measures it has identified as remedies for its corruption risks. For each measure, the plan includes indicators that track its implementation and sources of verification through which implementation is confirmed. The content of an integrity plan may follow from regulatory requirements, from templates provided by the national strategy or from arrangements adopted by the institution to comply with strategic obligations. The analysis therefore examines the formal design of integrity instruments as set out in the plans.

The sample comprises five public sector entities in Romania, selected to reflect institutional variation rather than statistical representativeness. Three criteria guided the selection. First, the entities had to belong to different institutional types. Second, each entity had to be exposed to corruption risks through its activity. Third, the integrity plan of each entity had to be publicly available on its official website. The five entities are presented in Table 1.

Table 1: Sample of public sector entities

Entity	Institutional type	Sector
General Secretariat of the Government	Administrative support body of the Government	Technical, legal and organisational support for government activity
Ministry of Investments and European Projects	Line ministry	Coordination of investments and projects
National Energy Regulatory Authority	Independent regulatory authority	Regulation of the energy market
Bucharest City Hall	Local public authority	Local public administration of Romania's capital city
Hidroelectrica S.A.	State-owned enterprise	Electricity production and system services in the energy sector

The five entities operate within different institutional settings, which makes it possible to examine the orientation of integrity measures across institutional types within a single national strategic cycle. The logic of the analysis follows what Yin (2013) terms analytic generalisation, understood as the extraction of a more abstract level of ideas from case study findings that may inform the understanding of integrity plans as organisational instruments beyond the specific cases studied. The findings describe the five integrity plans analysed, and the patterns identified across these cases are intended to contribute to a broader understanding of how such instruments operate, rather than to support statistical inference about integrity plans across Romanian public administration as a whole.

The documents analysed are the integrity plans adopted by the five entities for the 2021-2025 strategic cycle. The plans were retrieved from the official websites of the respective entities in May 2026 and correspond to the versions publicly available at that time. Implementation reports were excluded because the research question concerns the design of integrity measures rather than their subsequent implementation, and because such reports were not consistently available across the five entities. The integrity plan of Hidroelectrica S.A. includes an annex applying OECD guidelines on internal control, ethics and compliance, in line with the requirement of the National Anti-Corruption Strategy that state-owned enterprises incorporate such guidelines. The annex does not follow the structure of the main body of the plan, as it lists implementation instruments rather than performance indicators, and was therefore excluded from the coding.

The unit of analysis is each integrity measure, as listed in the "measures" column of each plan. Together, the five plans contain 121 measures: 41 in the plan of the General Secretariat of the Government, 14 in the plan of the Ministry of Investments and European Projects, 17 in the plan of the National Energy Regulatory Authority, 40 in the plan of Bucharest City Hall and 9 in the plan of Hidroelectrica S.A.

The coding procedure was applied to each of these measures along two dimensions. The first dimension concerns the orientation of the measure, classified as either compliance-based or values-based. The criteria adopted for each orientation follow the characterisation set out by the OECD (2020), which describes rule-based measures in terms of conformity with externally imposed standards, audits and controls, and reduced discretion, and values-based measures in terms of the development of organisational values, education on values and standards of conduct, and the cultivation of ethical competence. A measure was coded as compliance-based when its source of verification consisted of formal documentation, such as an administrative order, a register, a report, a declaration or a checklist, or when its performance indicator was binary or formally quantitative, or when its content concerned the adoption, completion or transmission of a formal instrument. By contrast, a measure was coded as values-based when its source of verification went beyond formal documentation, such as the assessment of training outcomes beyond participation or evidence of change in knowledge or attitudes, or when its content concerned ethics training, ethical leadership or the development of staff understanding of integrity norms in terms that went beyond procedural compliance.

The criteria were applied in a defined order, since the study examines how integrity is operationalised within the plans. The source of verification was used as the primary criterion because it indicates what is to count as evidence that a measure has been implemented. It shows whether implementation is to be demonstrated through formal administrative evidence or through evidence capable of capturing changes in knowledge, attitudes, conduct or organisational practice. Within this focus, a measure may be framed in values-oriented terms, but if its implementation is verified exclusively through formal documentation, then, at the level of the plan, it is operationalised through compliance-based mechanisms. Where the source of verification was ambiguous or absent, as in the plan of Hidroelectrica S.A., which does not include a column for sources of verification, the performance indicator was used. Where the indicator did not yield a clear classification, the wording of the measure itself was examined.

The substantive content of a measure nevertheless remains relevant. The coding framework therefore includes a second dimension, which records aspirational values content when the wording or indicators of a measure refer to ethics training or to staff knowledge of integrity norms, while the source of verification remained formal. This dimension addresses the relationship between the values-related content of a measure and the way it is made verifiable within the plan. Ethics training, for example, may be formulated in values-oriented terms. Whether its formal operationalisation matches this formulation depends on whether the verification mechanism captures something beyond participation, attendance or the existence of a report.

The framework was first tested on a subset of measures from each plan, then applied across all 121 measures.

4. Findings and Discussion

The analysis of the 121 measures leads to a first finding. All measures were coded as compliance-based under the primary criterion. Table 2 presents the distribution by entity. No measure in the sample met the criteria for being coded as values-based.

Table 2: Distribution of integrity measures by orientation

Entity	Total measures	Compliance-based	Values-based
General Secretariat of the Government	41	41 (100%)	0
Ministry of Investments and European Projects	14	14 (100%)	0
Bucharest City Hall	40	40 (100%)	0
National Energy Regulatory Authority	17	17 (100%)	0
Hidroelectrica S.A.	9	9 (100%)	0
Total	121	121 (100%)	0

This result should not be interpreted as an invalidation of compliance-based measures. Within an integrity system, certain interventions necessarily require rules, procedures and formal control mechanisms. The transposition of the EU whistleblower protection directive or the periodic internal audit of corruption prevention, for example, cannot function without legal and procedural frameworks. The problem identified by the analysis emerges when this formal framework remains the only way in which integrity is operationalised, without being accompanied by interventions oriented towards conduct, organisational practices or the internalisation of public values.

In the plans examined, a measure is considered implemented when the institution can indicate formal evidence of its implementation. This evidence may consist of an administrative act, a register, a report or a numerical indicator. It confirms that the institution has carried out an activity included in the plan, but it does not show whether that activity produced effects on conduct, internal practices or corruption vulnerabilities. From this perspective, the plans monitor the achievement of outputs rather than outcomes.

This limitation can be observed in the case of measures that, at least in their formulation, open towards the values-based component of integrity. Training in corruption prevention, transparency, ethics and integrity is verified through reports and related documentation, while awareness campaigns on corruption are verified through reports, related documentation and materials published on the institution's website. These sources confirm that the activities took place. They do not show whether training reduced integrity incidents, changed the way staff manage conflicts of interest or increased willingness to report irregularities, nor whether awareness campaigns changed the behaviour of target groups or reduced corrupt practices in the interaction

between public officials and citizens. In both cases, the measure produces an administrative trace of the activity, but no mechanism through which its effect on conduct can be verified.

The finding that all measures are compliance-based should therefore be understood as a diagnosis of the imbalance within the formal design of the analysed plans. The plans go beyond including formal-administrative measures where such measures are necessary. In the analysed documents, integrity is formally operationalised almost entirely through such instruments. Compliance is present in every measure, while the values-based component does not become observable through the sources of verification. This configuration moves away from the balance that the OECD (2020) places at the centre of integrity management. Compliance-based and values-based approaches are not alternatives, but components that should support one another. In the five plans analysed, the first component is fully present, while the second remains without its own mechanisms of verification.

The second coding dimension brings further detail to this picture. Table 3 presents the results.

Table 3: Measures containing aspirational values content

Entity	Total measures	Measures with aspirational values content	%
Bucharest City Hall	40	19	48%
General Secretariat of the Government	41	13	32%
Ministry of Investments and European Projects	14	4	29%
National Energy Regulatory Authority	17	0	0%
Hidroelectrica S.A.	9	0	0%
Total	121	36	30%

Of the 121 measures analysed, 36 contain aspirational values content. Close to one third of the measures included in the plans refer to ethics training or to the development of staff knowledge of integrity norms in their formulation or among their indicators, yet none is verified through mechanisms capable of capturing such elements. Values-related content is present at the level of formulation, but the source of verification only checks whether the action took place, not whether it produced the type of change that a values-based measure would be expected to pursue.

The distribution by entity also varies. Bucharest City Hall, the General Secretariat of the Government and the Ministry of Investments and European Projects include such measures in proportions ranging from 29% to 48%, while the National Energy Regulatory Authority and Hidroelectrica S.A. include no measures of this type. This variation indicates that integrity plans do not function as a uniform instrument across the entities analysed.

The variation can be illustrated through a measure that appears in similar wording in the plans of Bucharest City Hall and the National Energy Regulatory Authority. The measure concerns the consolidation of professionalism in the careers of public sector staff. In the plan of Bucharest City Hall, the performance indicators for this measure include the number of staff trained in the fields of ethics, integrity and anti-corruption. In the plan of the National Energy Regulatory Authority, the same measure is retained, but this indicator is omitted. Only quantitative indicators remain.

A further observation, which concerns not the orientation of the measures but their content, emerged during the coding. Some measures are not adapted to the institution that adopts them. They are taken over from the national strategy in identical or near-identical wording, without adjustment to the entity's specific activity or vulnerabilities. This suggests that the plans are not, in all cases, the result of an effort to translate integrity into the institution's own organisational context.

5. Conclusions and Limitations

This study examined how public integrity is articulated within the integrity plans adopted by Romanian public institutions. The analysis covered 121 measures from five integrity plans adopted within the 2021-2025 strategic cycle of the National Anti-Corruption Strategy. The reading was informed by the distinction drawn by the OECD between rule-based and values-based approaches.

The analysis showed that all 121 measures were coded as compliance-based, while 36 contain values-related aspirations in their formulation or among their indicators, operationalised through compliance-based mechanisms. The proportion of measures containing such aspirations varies across institutional types, from 48% at Bucharest City Hall to none at the National Energy Regulatory Authority and Hidroelectrica S.A. A closer reading also showed that a substantial part of the content of the plans does not address institution-specific corruption risks.

Read together, these results suggest that integrity plans in this strategic cycle operate less as instruments of organisational integrity management in the sense advanced by the OECD (2020), and more as documentary forms through which institutions discharge their obligations under the national strategy. If integrity plans are to function as instruments of organisational integrity management, institutions would need to formulate indicators capable of assessing effects on conduct and organisational practices, rather than only recording formal evidence that an activity has taken place.

The research has limitations that should be considered when interpreting the findings. The sample comprises five entities and was constructed to reflect institutional variation, not to support statistical generalisation. The patterns describe the five plans analysed and cannot be extended to all integrity plans across Romanian public administration without further empirical work. The selection of the five cases also carries limitations of its own. Each of the five entities represents a single instance of a broader institutional category. Bucharest City Hall is the capital city administration and may not reflect the design choices made by smaller local authorities. Hidroelectrica S.A. is a large state-owned enterprise listed on the stock exchange and may not reflect the practices of smaller state-owned enterprises operating under different governance arrangements. The National Energy Regulatory Authority operates in a specific sectoral context, and other independent regulatory authorities may approach integrity plans differently. The Ministry of Investments and European Projects manages European funds and may face integrity requirements specific to this activity that other line ministries do not face. The patterns identified in the analysis should therefore be read with these case-specific characteristics in mind.

Another limitation concerns the data analysed. The study relies exclusively on document analysis and examines the formal design of integrity measures as articulated in the integrity plans. It does not assess whether these measures reflect actual organisational practices or how integrity is interpreted and enacted within the entities that adopt the plans.

A separate limitation concerns the construct examined. As formal documents, integrity plans may reflect a range of obligations distinct from the integrity culture of the organisation that adopts them. The findings should therefore be read as evidence of how integrity is articulated within the formal design of these instruments, not as direct indicators of the integrity of the organisations themselves.

A further limitation concerns the coding hierarchy adopted in the analysis. Because the primary classification prioritises verification mechanisms, the analysis foregrounds the formal operationalisation of measures rather than their substantive content alone. An alternative coding framework, giving priority to the content or declared purpose of each measure, would produce a different reading of the same plans, particularly in the case of ethics training, awareness campaigns or measures aimed at increasing staff knowledge of integrity norms. Under such a framework, a measure addressing ethics training would be classified as values-based on the basis of its content, irrespective of whether its verification mechanism captures effects on conduct. The two readings are not incompatible. The second coding dimension introduced in this study was designed to capture precisely these cases, by recording aspirational values content where values-related aims are present but verification remains compliance-based.

The coding was carried out by the authors, with internal consistency checks during the process. External verification would strengthen any future extension of the analysis.

Future research could strengthen the findings through triangulation, combining the analysis of integrity plans with interviews with civil servants, contractual staff and persons in management positions within the adopting institutions, together with the examination of implementation reports or other evidence of organisational practice. Such an approach would help to capture how integrity is interpreted and enacted within Romanian public institutions, beyond the level of formal documentary design, and would clarify why the design of measures tends towards compliance and what considerations shape the choice of indicators and sources of verification.

Ethics Declaration: Ethical clearance was not required for this study.

Declaration of generative AI: Generative AI tools were used only for translation support and typo correction. The authors reviewed the final text and take full responsibility for the content of the paper.

Acknowledgements

Funded by NUPSPA during the PhD programme.

References

Audi, R. and Murphy, P. E. (2006) "The Many Faces of Integrity", *Business Ethics Quarterly*, Vol. 16, No. 1, pp 3-21. https://doi.org/10.5840/beq20061615

Bajpai, R. and Myers, C. B. (2020) *Enhancing Government Effectiveness and Transparency: The Fight Against Corruption*, Vol. 1, [online], World Bank Group, Washington, DC, http://documents.worldbank.org/curated/en/235541600116631094

Calderón, R., Piñero, R. and Redín, D. M. (2018) "Can compliance restart integrity? Toward a harmonized approach. The example of the audit committee", *Business Ethics, the Environment & Responsibility*, Vol. 27, No. 2, April, pp 195-206. https://doi.org/10.1111/beer.12182

Cambridge Dictionary (n.d.) "Integrity", [online], Cambridge University Press & Assessment, https://dictionary.cambridge.org/dictionary/english/integrity

Commission of the European Communities (1997) "Commission Opinion on Romania's Application for Membership of the European Union", COM(97)2003, [online], Brussels, https://enlargement.ec.europa.eu/opinion-romanias-application-membership-european-union_en

Evans, M. (2012) "Beyond the integrity paradox - towards 'good enough' governance?", *Policy Studies*, Vol. 33, No. 1, pp 97-113. https://doi.org/10.1080/01442872.2011.637324

Government of Romania (2021) „Hotărârea Guvernului nr. 1269/2021 privind aprobarea Strategiei naționale anticorupție 2021 - 2025 și a documentelor aferente acesteia", Monitorul Oficial al României, Part I, No. 1218, 22 December, pp 3-110. https://legislatie.just.ro/Public/DetaliiDocument/249828

Huberts, L. W. J. C. (2018) "Integrity: What it is and Why it is Important", *Public Integrity*, Vol. 20, pp 18-32. https://doi.org/10.1080/10999922.2018.1477404

Kayes, D. C., Stirling, D. and Nielsen, T. M. (2007) "Building organizational integrity", *Business Horizons*, Vol. 50, No. 1, pp 61-70. https://doi.org/10.1016/j.bushor.2006.06.001

Kirby, N. (2021) "An 'Institution-First' Conception of Public Integrity", *British Journal of Political Science*, Vol. 51, pp 1620-1635. https://doi.org/10.1017/S000712342000006X

Kroeze, R., Vitória, A. and Geltner, G. (eds) (2017) *Anti-corruption in History: From Antiquity to the Modern Era*, Oxford University Press, Oxford. https://doi.org/10.1093/oso/9780198809975.001.0001

Miller, S. (2023) "Corruption", [online], Stanford University, https://plato.stanford.edu/entries/corruption/

OECD (2017) *Recommendation of the Council on Public Integrity*, OECD/LEGAL/0435, [online], https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0435

OECD (2020) *OECD Public Integrity Handbook*, OECD Publishing, Paris. https://doi.org/10.1787/ac8ed8e8-en

OECD (2026) *Anti-Corruption and Integrity Outlook 2026: Harnessing the Integrity Advantage*, OECD Publishing. https://doi.org/10.1787/16708b78-en

Paine, L. S. (1994) "Managing for Organizational Integrity", [online], Harvard Business Review. https://hbr.org/1994/03/managing-for-organizational-integrity

Transparency International (n.d.a) "What is corruption?", [online], Transparency International, https://www.transparency.org/en/what-is-corruption

Transparency International (n.d.b) "Integrity", [online], Transparency International, https://www.transparency.org/en/corruptionary/integrity

Transparency International Romania (2012) „Strategia Națională Anticorupție", [online], Transparency International Romania, https://www.transparency.org.ro/en/content/strategia-nationala-anticoruptie

Yin, R. K. (2013) "Validity and generalization in future case study evaluations", *Evaluation*, Vol. 19, No. 3, pp 321-332. https://doi.org/10.1177/1356389013497081