

CORRUPTION PREVENTION

CONCEPTS: WORKPLACE CULTURE



Australian Government
Australian Commission for
Law Enforcement Integrity

Workplace culture has the potential to impact employee decision making or behaviour and may lead to increased corruption vulnerability within law enforcement agencies.

ACLEI has observed occurrences of toxic subcultures and deviant workplace behaviours in law enforcement agencies which have contributed to instances of corruption.

This factsheet outlines several key risk areas identified by ACLEI during its investigations, and broader patterns and trends identified in similar environments both here and overseas.

What is Workplace Culture?

Workplace culture is defined as the shared values, beliefs and attitudes which contribute to certain social characteristics of an agency. The culture of an agency is influenced through activities such as the daily interactions between employees, recruitment of new staff and how the agency rewards or disciplines staff behaviour. Larger agencies may consist of multiple subcultures which develop and evolve over time and may be specific to particular work areas.¹



There is significant evidence that workplace culture may drive and sustain corrupt conduct in agencies.² Within some law enforcement environments there is a risk that corrupt actions or deviant workplace behaviour may replace day-to-day agency procedures to become the new 'normal'³ or simply 'how things are done around here'.

Deviant workplace behaviour is a broad term which can be used to explain a range of behaviours that influence workplace culture, from relatively minor workplace issues (e.g. working on a personal matter during work hours) to criminal acts such as fraud and corruption.⁴

Corrupt actions or deviant workplace behaviours may start out as isolated acts engaged in by a small number of 'bad apples' in an agency. However, thinking that corruption is always a corrupt individual acting alone can draw attention away from broader agency vulnerabilities and systemic corruption issues.⁵ A narrow focus on what causes corruption may cause agencies to miss early intervention opportunities or fail to implement effective corruption prevention strategies.

Social norms in the workplace which enable or excuse corrupt conduct may adversely influence the attitudes and behaviours of other employees, even if they have strong views that the conduct is unethical or wrong.⁶ In contrast, strong anti-corruption and integrity values shared by employees of an agency will likely result in higher levels of overall compliance and reduced instances of corrupt conduct.⁷

¹ Watkins, M.D. 2013. What is Organisational Culture and Why Should We Care? *Harvard Business Review* online [here](#)

² Schneider, P. and Gautam B. 2017. Organizational Cultures of Corruption. *Journal of Public Economic Theory*, 19(1), pp.59-80.

³ Wellen, J. 2004. From Individual Deviance to Collective Corruption: A Social Influence Model of the Spread of Deviance in Organisations. In Bailey, C., Cabrera, D., & Buys, L. (Eds.) *Social Change in the 21st Century Conference; Centre for Social Change Research; Queensland University of Technology*.

⁴ Ibid

⁵ ACLEI. 2019. "Corruption Prevention Myths: Bad Apples" – online [here](#)

⁶ Jackson, D. and Kóbis, N. 2018. *Anti-corruption through a social norms lens*. U4 – Anti-Corruption Resource Center.

⁷ Tantardini, M. & Garcia-Zamor, J. 2015. *Organizational Social Capital and Anticorruption Policies: An Exploratory Analysis*. Public Organization Review. pp. 599-609.

Positive workplace culture can act as a strong deterrent against corruption, especially when it complements other mechanisms in an agency's corruption prevention system. Robust integrity cultures within an agency provide employees with a point of reference to inform decision-making, establish acceptable workplace behaviours and support the prevention and/or identification of undesired or unacceptable actions.⁸

What you need to know:

High risk area — law enforcement subculture

A deep-rooted 'esprit de corps' exists in law enforcement agencies, resulting in subcultures forming based on intense group loyalty. This increases the risk that a culture of misplaced loyalty may develop, with loyalty shifting away from the agency and towards the interpersonal relationships employees have formed. This can lead law enforcement officers to underreport possible corrupt conduct of their colleagues.

Camaraderie between certain employees may also increase the likelihood that colleagues will 'close ranks' to cover up knowledge of wrongdoing. 'Employee silence' is a common phenomenon in agencies with a weak integrity culture. In contrast, a willingness of employees to report deviant behaviour or corrupt conduct can be considered a sign of a health integrity culture within the agency or work area.

ACLEI investigations have identified instances where law enforcement officers failed to report the conduct of colleagues because they did not want their colleagues to get in trouble. A subculture of loyalty to colleagues outweighed loyalty to the agency.

High risk area — 'one size fits all' prevention strategies

Formal training and education are corruption prevention mechanisms which are easy to implement and can provide measurable change in workplace culture. However, ACLEI suggests agencies also consider other less formal solutions which influence longer-term, agency-wide changes in integrity culture.



ACLEI supports a 'best fit' approach, where combinations of strategies are employed: a "purpose, place, person"⁹ solution dependent on the unique work environment and agency risks. ACLEI believes there is no one 'best practice' solution to managing corruption risk and what may be effective in one agency or environment may have limited impact in another.

A notable factor in recurrent workplace corruption is the failure of agencies to implement and monitor new reforms arising from past corrupt behaviours and investigations.¹⁰ Underlying issues which have previously contributed to corrupt behaviour need to be addressed in order to achieve positive cultural changes within the agency.

Indifference in an agency's integrity framework may also increase corruption vulnerability, especially when combined with inadequate governance, support and oversight mechanisms. Anti-corruption policies must be clear and easy to understand by staff at all levels of the agency and monitored for their effectiveness. Inconsistency between policy and workplace procedures may make it difficult for employees to adhere to proper conduct and identify what conduct should be reported.

⁸ Watkins, M.D. 2013. What is Organisational Culture and Why Should We Care? *Harvard Business Review* online [here](#)

⁹ ACLEI – Corruption Prevention. Key Concepts - Early Intervention online [here](#)

¹⁰ Plibersek, R and Mills, A. 2010. Is Monitoring Implementation The Key To Preventing Repeated Workplace Corruption? *Commonwealth Journal of Local Governance* online [here](#)

High risk area — ‘tone at the top’

Strong leadership is required throughout an agency to influence a positive integrity culture. How an agency’s senior executives and managers behave (the ‘tone at the top’) influences the conduct of staff and sets expectations for how all agency staff should act. Inaction by senior staff in response to misconduct may reinforce a workplace culture which systematically downplays the importance of anti-corruption strategies and reinforce a culture where corruption is prevalent.¹¹

Workplace behaviours evolve over time as employees observe what behaviour is acceptable and what is not. When law enforcement agencies fail to address misconduct they inadvertently foster a culture which may be conducive to corruption. Corruption may be more widespread in work areas where supervisors turn a blind eye to other types of deviant workplace behaviours.

Inconsistencies between the agency’s integrity values and actual behaviour of senior staff may result in increased likelihood of corrupt behaviour by employees.¹² Additionally, an employee may be less likely to report corrupt conduct if they perceive management could be unsupportive or are unethical in their own practices.¹³

ACLEI have noted instances where managers knew of corrupt behaviour in their office (e.g. misuse of departmental resources, failure of employees to declare conflicts of interest, etc.) but failed to report it. This fosters an environment where there are no perceived repercussions and potentially corrupt or deviant behaviour becomes normalised within the work environment.

ACLEI Case Study Example

ACLEI received four allegations of corruption concerning the same work area in a relatively short period of time. The work area had undergone a restructure—which involved two similar but previously independent work areas being merged—in the years before the allegations were received.

It was alleged that internal factions had formed within the new work area and some of the members were favoured regarding day-to-day management, opportunities for postings and promotions or flexible work arrangements. It was also alleged that management turned a blind eye to potential corrupt conduct engaged in by certain employees. The allegations conveyed a toxic subculture where deviant workplace behaviour and corrupt conduct could flourish with little to no repercussions for the offenders.

The behaviours modelled by management conflicted with the agency’s integrity values. The failure to address the ongoing corrupt conduct was perceived by others to condone the behaviour of the offenders. Inaction by senior management may have also increased the number of employees involved in the alleged conduct as there were no perceived ramifications for the group’s behaviour.

¹¹ Sööt, M. 2012. The Role of Management In Tackling Corruption. *Baltic Journal of Management*, 7(3), pp. 287-301.

¹² Ibid

¹³ New South Wales Independent Commission Against Corruption (ICAC). 2018. ‘Corruption and integrity in the NSW public sector: an assessment of current trends and events’. online [here](#)

What should you do?

For agencies:

- Agencies should consider whether their integrity frameworks are supported by consistent and regular messaging reinforcing expected standards. Keep messages appealing, timely and relevant.
- Actively promote integrity expectations – if the values of anti-corruption are shared by employees within an agency, it is more likely to result in overall compliance.
- Support proactive integrity reporting – ensure employees understand how reported information will be managed.
- ACLEI suggests a 'best fit' prevention strategy approach — identify, assess and treat the unique risks within individual operational environments to manage corruption vulnerabilities.
- Different subcultures may exist within the agency — identify weak integrity hotspots and consider different approaches when implementing agency-wide culture and change programs.

For managers:

- Cultivate a work environment where professional standards are valued and model preferred behaviour.
- Take effective action against corrupt behaviour and reinforce the value of reporting corruption.
- Foster an environment where your team are empowered to ask questions, seek advice and raise concerns — they are best placed to know if something is going on in the work area.
- Be aware of exclusive internal networks or subcultures forming within your work area.

For employees:

- Become familiar with integrity standards and internal reporting processes within your agency.
- Contribute to positive workplace integrity culture by modelling preferred workplace behaviour.
- Don't self-manage risk — act early and report it to your agency.

Further information

- ACLEI have developed a series of corruption prevention posters for the use of public and private sector agencies to promote and enhance integrity awareness. The posters use behavioural insight tools to communicate integrity expectations, encourage reporting, and reinforce the positive role which all employees play in maintaining a high integrity workplace. ACLEI's Corruption Prevention Posters can be access via the ACLEI website: [here](#)
- ACLEI Corruption Prevention Concepts Factsheet: [Social Capital](#)
- ACLEI Corruption Prevention - Key Concepts: [What is the Best Approach to Early Intervention?](#)



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