

## Transparency International Anti-Corruption Helpdesk Answer

# Overview of executive codes of conduct and ministerial codes

**Author:** Mathias Bak, [tihelpdesk@transparency.org](mailto:tihelpdesk@transparency.org)

**Reviewer:** Matthew Jenkins, Transparency International

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This paper explores codes of conducts for ministers and public officials in the executive branch of government, with a focus on how and to what extent these are enforced.

The paper finds that, regardless of whether or not a country has established a ministerial code, it is critical that mechanisms for investigating and sanctioning ministerial and executive misconduct are independent of political interests.

Codes of conduct need to be both specific, aspirational and enforceable. Yet many ministerial codes are predominantly aspirational, often failing to hold ministers to account because they lack specificity and enforceability. Ministerial codes are rarely legally binding and their enforcement – particularly in Westminster style systems – tends to be at the discretion of the prime minister whose decisions may be influenced by political considerations or by differing notions of what constitutes ethical behavior.





## Query

Please provide an overview of different countries' institutional models to oversee and enforce codes of conduct in the executive branch of government.

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## Introduction

A code of conduct is a statement that sets out values and behavioural guidelines for an institution, organisation or a group of individuals therein (Transparency International 2009).

Codes of conduct can be divided into aspirational and rule-based types (Jenkins 2015:4). Whereas rules-based codes of conduct are more specific and easier to enforce, aspirational codes of conduct set out broader ethical principles to which individuals subject to the code are expected to adhere.

A strong code of conduct contains elements of both aspirational and rules-based codes of conduct: it sets out broad ethical guidelines, and contains a specific list of behaviours and actions that are not tolerated. As such, a robust code of conduct does not simply endorse general principles such as 'impartiality' or 'neutrality', but specifies what does and does not constitute impartiality and neutrality in the line of duty.

Therefore, a code of conduct can both provide a standard against which to assess behaviour and

## Main points

- Most ministerial codes are enforced on an inconsistent basis. Enforcement mechanisms are rarely independent and is often at the discretion of the Prime Minister who may or may not have incentives to ignore misconduct.
- Disciplining ministers is difficult in many political contexts, and whether or not a country has a code of conduct specifically for the executive, rules that seek to discipline ministers need to be specific, aspirational and enforceable by an independent body.

provide guidance in cases where an official has done something that is not necessarily illegal but may be considered unethical (Jenkins 2015).

A code of conduct should be considered an integral component to be embedded into a wider integrity system with strong checks and balances and accountability mechanisms (Lindner 2014: 3). In this sense, the successful implementation of a code of conduct requires a number of elements, including endorsement by organisational leadership, administrative structures to monitor, review, and guide compliance as well as mechanisms to enforce rules and apply disciplinary measures (Lindner 2014).

This last point is key. The institutional and legal framework for oversight and enforcement should provide for clear, independent enforcement mechanisms for sanctioning unethical and partisan behaviour (Jenkins 2015: 4).



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While most advanced democracies have implemented codes of conduct for officials and civil servants (Lindner 2014: 2), some countries have also implemented a specific code of conduct for ministers and political appointees in the executive branch, which are occasionally be referred to as ministerial codes.

However, this does not appear to be common practice. In the process of researching this paper, ministerial codes have exclusively been found in political systems based on the Westminster model and predominantly in countries that are either Anglophone or part of the Commonwealth of Nations.

Countries that have been heavily influenced by the Westminster model tend to have Prime Ministers vested with strong constitutional powers (Dunleavy 2013). For instance, Prime Ministers in these kind of polities tend to enjoy the power to change the makeup and structures of their cabinet through executive action (Dunleavy 2013).

Governance in many of these Anglophone democracies has been characterised by a number of “constitutional conventions”, essentially a series of norms that have almost evolved into unwritten laws (Goss 2015). For example, the Speaker of the House of Commons in the United Kingdom is expected to operate independently of party politics despite the fact that no formal rules stipulate this as a requirement (Goss 2015).

As conventions are rarely written into law, they cannot be enforced in courts. Violating a convention or a norm typically entails a political price rather than a legal one (Goss 2015). Indeed, convention, precedent and political culture all play a key role in how ministerial accountability is understood in different countries, and for which kinds of error or maladministration a minister ought to resign (Goss 2015).

As such, ministerial codes may prove more suited to guarding against behaviour considered immoral, such as bullying or lying, than to

preventing or rectifying criminal abuses of power, such as corruption that are liable to be prosecuted under the law. Nonetheless, codes of conduct are believed to help reduce misconduct that fall into the grey zone, such as unresolved conflicts of interest (UNODC 2020).

## Overview of codes of conduct for cabinet members

### Australia

The [Statement of Ministerial Standards](#) is the code of conduct for Australian ministers. The Statement establishes standards for Australian ministers, stating that ministers should accept accountability, act with integrity, fairness and balance.

Ministerial codes of conduct were first introduced in Australia in 1996, but the integrity standards used today (the so-called Faulkner standards) were drafted by the Labour shadow cabinet, who made them official party policy in 2001 (Whitton 2020). As with most other ministerial codes, the document is revised and endorsed at the beginning of each cabinet (i.e. [Scott Morrison's document](#) was published in 2018).

The document includes rules for disclosing conflicts of interests, guidance for directorships, retaining ownership shares and income-generating activities as well as articles that prohibit former ministers from lobbying members of the current government, parliament or public service until 18 months after leaving office (Australian Statement on Ministerial Standards 2018).

Investigations into alleged breaches of the Statement of Ministerial Standards can be initiated by the Prime Minister, and, judging from case evidence, initiating investigations and enforcement of the Australian ministerial code appears to be at the discretion of the Prime Minister. Enforcing the ministerial standards has proved challenging and rules such as the 18-



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months waiting period for ex-ministers have repeatedly been broken (Whitton 2020).

Whether the Australian system of enforcing ministerial standards is fit for purpose and capable of holding ministers to account has been tested in a number of cases in recent years. In early 2020, Bridget McKenzie, Australia's then Minister of Sports, funnelled AU\$100m into sports programmes in marginal seats (as well as into a sports club she was a member of herself).

According to the Australian Auditor-General, the scheme was illegal and the targeting of funds was clearly politically motivated (Snape 2020). The Auditor-General's report was handed to the Secretary of the Department of the Prime Minister and Cabinet whose investigation found that McKenzie had breached ministerial standards. Shortly thereafter Scott Morrison asked McKenzie to step down as Minister of Agriculture (ABC 2020).

Another (at the time of writing, ongoing) case involves an alleged rape by a still-unnamed member of Australia's cabinet. There have been calls to suspend the alleged minister because the Ministerial Code specifies that a minister accused of misconduct should step aside during an investigation (Remeikis 2020). Morrison, however, has declined to do so, and has not taken investigative action as the responsibility to investigate a crime such as rape, according to Morrison, falls upon the police (Remeikis 2020).

## Canada

Canadian ministers are expected to adhere to the principles set forth in the [Open and Accountable Government](#) document. This document is revised and presented by each Prime Minister to the cabinet who accept its conditions upon commencing ministerial duties.

The publication of the document is a new phenomenon; the [first ministerial code of conduct paper](#) to be disclosed to the public was released in 2015 by Prime Minister Trudeau (2015). The document sets out the principles

that ministers should adhere to and provides guidelines on matters and principles of integrity, behavioural standards and accountability, including how ministers should engage with the civil administration, parliament and central agencies; lobbying and fundraising and the principle of individual and collective responsibility.

Recent years have seen an expansion in the scope of the document, which now, in the annex, includes guidelines on matters such as the use of social media and state communication resources. The Open and Accountable Government document builds upon another document, authored in 1993, titled Responsibility in the Constitution that covers fundamental Canadian political principles such as the principle of individual and collective ministerial responsibility (Government of Canada 1993).

There has not been much public debate on Canada's ministerial standards and, as a result, there is little information on how Canada enforces the Open and Accountable Government principles.

Canada's [Conflict of Interest and Ethics Commissioner](#) (henceforth the Commissioner) is responsible for implementing and enforcing the [Conflict of Interest Act](#) (2006). In case of an alleged breach of the Conflict of Interest Act, the Commissioner can initiate investigation independently or at the request of a legislator and can impose a fine of up to CD\$500 (Office of the Conflict of Interest and Ethics Commissioner 2019).

However, while the Commissioner may be able to enforce some level of accountability among Canadian ministers, the actual enforcement mechanisms of Canada's ministerial code appears to be at the discretion of the Prime Minister. Notably, in 2019, when Prime Minister Justin Trudeau attempted to pressure then-Justice Minister Jody Wilson-Raybould into intervening on behalf of a Quebec-based construction firm in a corruption prosecution (thus violating the Conflicts of Interest Act and



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the ministerial code), Wilson-Raybould herself resigned (Ljunggren, Scherer 2019).

Another recent case involves the Governor General of Canada, the Queen's representative in the country, who currently stands accused of bullying staff and misuse of public money (Wright 2020). The Prime Minister cannot directly fire the Governor General, but can either ask the Queen to do so or attempt to persuade the Governor to resign.

## Ireland

Ireland has implemented a number of codes of conduct for various forms of government staff, including one for office holders. The [Code of Conduct for Office Holders](#) sets out standards that all elected officials, including the Taoiseach (Prime Minister), the Tánaiste (deputy Prime Minister) and Cabinet members.

Overall, the Irish ministerial code resembles those in other Anglophone countries, in that sets out standards expected of ministers (see Standards Commission 2003). The Code of Conduct requires ministers to act in accordance with the guidelines produced by the Standards in Public Office Commission (henceforth the Standards Commission).

The Standards Commission was established in 2001 by the Standards in Public Office Act and is tasked with overseeing compliance with legislation in areas such as political financing and lobbying as well as evaluating complaints and allegations of violation of rules and regulations (Standards in Public Office Commission 2021).

The Standards Commission can independently investigate and evaluate alleged violations of the 2001 Act, including by ministers (Standards Commission 2021). Findings of these investigations are often published on the Standards Commission's [investigation reports page](#).

The [Ethics in Public Office Act](#) (1995) contains provisions to penalise ministerial misconduct

with fines or prison sentences, giving the Standards Commission the mandate to recommend remedial action, hand out a fine, or, in the worst cases, sentence a offender to prison (Standards Commission 2021).

However, the firing of a minister over issues that do not amount to actual illegality ultimately resides with the Taoiseach. The Taoiseach was recently called upon to review the ministerial code of conduct when the Tánaiste, Leo Varadkar, leaked a confidential draft contract between the Irish government and the Irish Medical Association to a rival union for general practitioners (Moore 2020).

## New Zealand

New Zealand's ministers are expected to adhere to the [Cabinet Manual](#), a detailed 190-page document that acts as the code of conduct for ministers.

In addition to the Cabinet Manual, ministerial staff have a short (3 pages) code of conduct that lays forth the standards of integrity expected of ministerial staff. The Cabinet Manual is endorsed by any cabinet as the first act after being sworn in (Government of New Zealand 2017).

The Cabinet Manual details an important convention in New Zealand - that of Individual Ministerial Responsibility (Eichbaum 2020). Individual Ministerial Responsibility resembles a code of conduct for the individual minister, specifying various forms of responsibilities, including so-called 'primary' (e.g. not interfering with the work of the civil administration), 'personal' (e.g. avoiding using public office for private benefit) and 'vicarious' (taking responsibility for mistakes or ethical violations occurring somewhere in their ministry) (Eichbaum 2020). Ultimately, however, it is the Prime Minister that decides what constitutes a breach of conventions set out in the Cabinet Manual (ibid).

Ministerial sackings or resignations due to violations of ethical codes of conduct is not a



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frequent occurrence in New Zealand (Eichbaum 2020). Nevertheless, in July 2020, Prime Minister Jacinda Ardern fired New Zealand's minister of immigration for a consensual one-year long affair with a staff member (Associated Press 2020).

The case allegedly came to light after a tip by an opposition politician and did not require any investigation or third-party involvement, as the accusations were adequately substantiated and admitted by the minister himself who was fired for showing "... *a sustained lack of judgment over a long period of time*" (Ardern quoted in Roy 2020b).

Another ministerial resignation happened in July 2020, when New Zealand's health minister David Clark was found breaking Coronavirus restrictions on two occasions and later accused of being co-responsible for errors in enforcing quarantine rules (Roy 2020).

## UK

The UK's [Ministerial Code](#) sets out the standards to which a minister in the Government of the United Kingdom<sup>1</sup> is expected to adhere. The code is updated by each Prime Minister, but tends to remain largely consistent across various administrations. The Ministerial Code covers various principles of integrity, including how ministers should avoid conflicts of interests and how they should interact with the administration and civil servants. It also expects ministers of the UK government to adhere to the so-called [Seven Principles of Public Life](#) - the ethical standards for all who work in the public sector.<sup>2</sup>

The decision to initiate an investigation of an alleged breach of the ministerial code is taken by the Prime Minister who, under normal circumstances, would follow the advice of either his/her Independent Adviser on Ministerial Interests or Cabinet Secretary (Institute for Government 2020). A Member of Parliament (MP) can also write to the Cabinet Secretary (a

senior civil servant that acts as an adviser to the Prime Minister), but the mandate to enforce anything rests with the Prime Minister (Institute for Government 2020).

Moreover, the ministerial code is not a legally binding document (Haddon 2020). This level of discretion has been subject to criticism that it gives rise to an inconsistent system that often lacks an established process (see Thornton 2018).

On one hand, past UK governments have seen multiple firings following investigations related to the Ministerial Code, in some cases for embarrassing though relatively minor indiscretions, such as lying about pornography found on a work computer (the Guardian 2017).

Yet weaknesses in the UK's system of enforcing its ministerial code permits the Prime Minister to take no action. A 2018 [briefing paper](#) by the House of Commons Library noted the "controversy over decisions of successive Prime Ministers not to refer individuals to the [Independent] Adviser" on Ministerial Interests.

In a recent case, an independent inquiry into Ministerial Code breaches by the Home Secretary, Priti Patel, found that Patel had bullied civil servants and her actions constituted breaches of the Ministerial Code. This could (and would in most circumstances) have led to the Prime Minister, Boris Johnson, requesting Patel's resignation, but Johnson disregarded the conclusions of the enquiry, claiming that Patel was not aware of her bullying (BBC 2020).

This decision led to the resignation of the Prime Minister's Independent Adviser on Minister's Interests, Sir Alex Allan, who led the investigation into the bullying case (BBC 2020). The case has led questions around whether the system to investigate and sanction breaches of the Ministerial Code is fit for purpose given that political expediency seemed to trump convention in this instance (Haddon 2020).

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<sup>1</sup> That is, not the Scottish, Welsh or Northern Irish administrations.

<sup>2</sup> These principles are selflessness, integrity, objectivity, accountability, openness, honesty and leadership.



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## United States

The code of conduct for the United States presidential administration is [the Executive Branch Standards of Ethical Conduct](#).

The Standards of Ethical Conduct are issued by the Office of Government Ethics (OGE). The OGE works to implement the so-called executive branch ethics programme, which seeks to reduce the number of unresolved conflicts of interest, and supports the implementation of ethics standards across American executive departments and agencies, as well as monitoring the compliance of office holders with ethical commitments (Office of Government Ethics 2021).

The Office of Government Ethics also undertakes training sessions, monitors the extent to which office holders and senior leaders' comply with their ethical commitments and [publishes information on its oversight activities](#) (which reveals a general picture of the level of compliance of the ethics programme). Investigations of specific complaints or allegations against misconduct is not done by the OGE, but by individual departments' own [Inspector Generals](#).

The failure of the US institutional framework to prevent unresolved conflicts of interests in executive branch and the use of government financial and institutional resources for private benefit has become particularly apparent in the last four years.

According to Citizens for Ethics (2020b), President Trump violated conflicts of interests ethics rules more than 3,400 times and multiple cabinet members have engaged in gross misconduct and acts of corruption without being held to account (see e.g. Bloomberg 2019).

According to observers, the Trump administration severely undermined the executive branch's ethics infrastructure, which proved incapable of upholding long-standing norms of integrity and good governance in the

face of an administration that paid little regards to these conventions (Jenks 2020).

As a result, there have been calls for the incumbent Biden administration to overhaul the system for enforcing ethics and integrity in the executive branch of government (Citizens for Ethics 2020). These calls centre on strengthening the mandate, expanding available tools and the overall power of the OGE to equip it to sanction the executive branch when officials fail or refuse to comply with federal ethics laws or guidelines (Citizens for Ethics 2020).

## Ministerial codes of conduct and other systems of enforcing accountability of cabinet ministers

An interesting question is the extent to which dedicated ministerial codes of conduct – as opposed to broader integrity mechanisms that apply to a range of public officials – help improve integrity and accountability among cabinet ministers. Data from the [European Public Accountability Mechanisms Index \(EuroPAM\)](#) does not seem to indicate a strong correlation between the existence of codes of conduct specific to ministers on one hand and the ability of oversight bodies to hold ministers to account for breaches of ethical standards on the other.

For instance, with a score of 27 on the Conflict of Interest indicator, the United Kingdom does appear to perform significantly worse than the European average (40) in terms of regulating conflicts of interest of senior office holders, whereas Ireland scores substantially better (56), due to the mandate given to the Standards Commission.

Yet a country such as France, which does not have a specific ministerial code, has stronger sanctioning mechanisms for ministers who break the conflict of interests rules set out in the Act on Transparency in Public Life. Breaches of this Act



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are actively monitored by an oversight body called the [Authority of Transparency in Public Life](#) (EuroPAM 2017b).

Latvia, which according to EuroPAM's data has Europe's strongest framework for holding ministers accountable for conflicts of interests, simply applies the same principles to ministers that apply to MPs and civil servants. The Law of Prevention of Conflicts of Interest in Latvia is implemented, monitored and enforced by the independent Corruption Prevention and Combating Bureau (EuroPAM 2017c). Lithuania has also implemented a strong conflicts of interest preventive framework for ministers, which the independent Chief Official Ethics Commission is responsible for enforcing (EuroPAM 2017d).

The reason why the UK scores poorly on enforcing rules on conflicts of interest in the EuroPAM assessment compared to France, Latvia and Lithuania is that independent enforcement or sanctions mechanisms are not provided by the legal framework. As mentioned in the introduction to the paper, a code of conduct needs to be specific, aspirational *and* enforceable, and the UK system for ministers currently fails to meet that third standard.



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*Transparency International  
International Secretariat  
Alt-Moabit 96  
10559 Berlin  
Germany*

*Phone: +49 - 30 - 34 38 200  
Fax: +49 - 30 - 34 70 39 12*

*tihelpdesk@transparency.org  
www.transparency.org*

*blog.transparency.org  
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twitter.com/anticorruption*

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