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The Erasmus logo, featuring a stylized, handwritten-style script of the word "Erasmus" in a dark blue color.

**In between Success and Failure:
The Reality behind the Implementation of the Integrity
Management Program (IMP) in the Department of Social Welfare
and Development (DSWD)**

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Disclaimer:

This document represents part of the author's study programme while at the Institute of Social Studies. The views stated therein are those of the author and not necessarily those of the Institute.

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List of Acronyms

AAs	Attached Agencies
ADB	Asian Development Bank
AC	Anti-Corruption
DC	Design Context
DRG	Design- Reality Gap
DSWD	Department of Social Welfare and Development
EO	Executive Order
FOs	Field Offices
IDAP	Integrity Development Action Plan
IDR	Integrity Development Review
IMC	Integrity Management Committee
IMP	Integrity Management Program
IM	Integrity Measures
IMF	International Monetary Fund
IO	Information Officer
ITPOSMO	Information, Processes, Objectives and Values, Staffing and Skills, Management Systems and Structures, Other Resources
MAA	Management Audit Analyst
MACS	Mainstreaming Anti- Corruption Strategy
MSI	Management System International
NACS	National Anti- Corruption Strategy
OBS	Offices, Bureaus, Services
OECD	Organization for Economic Co-operation and Development
OMB	Office of the Ombudsman
OP-	Office of the President- Office of the Deputy Executive Secretary for
ODESLA	Legal Affairs
PAGC	Presidential Anti- Graft Commission
PDAF	Priority Development Assistant Fund
PMC	Program Management Committee
RDC	Reality of the Design Context

Glossary of Terms

Corruption Risks- Corruption risk is any integrity risk or corruption issue, deducible from observable gaps, issues, concerns, and flaws in the system which, when not adequately managed and addressed, may ripen into actual corruption

Integrity- the faithful and consistent application of generally accepted public values and norms in the daily practice of public sector institutions; the proper use of powers, authorities, assets, resources, and funds according to the official purpose for which they are intended, with the end in view of promoting public welfare.

Integrity Management - the continuous process of building, enforcing and fostering a culture of integrity within an organization or institution.

Integrity Measures- Policies, programs, and systems that provide an enabling environment for integrity management in an organization or institution. These are responses of public sector institutions to address issues, vulnerabilities, and concerns, and may come in the form of a set of policies, systems, programs, and activities to operationalize the well-identified integrity values, principles and standards.

Integrity Management Committee- The committee primarily responsible for effectuating the agenda of the IMP, and acts as the partner of the head of the public sector institution in managing the integrity of the organization.

Integrity Management Plan- A document that identifies and details the institution's requirements, concerns and specific courses of action in response to its integrity management needs and in pursuit of its anti-corruption agenda and integrity objectives.

Management Audit Analyst- Identified as DSWD Field Office auditor that performs audit-related functions and monitors the implementation of IMP at the field office level.

Program Management Committee- The oversight committee created by the Office of the President - Office of the Deputy Executive Secretary for Legal Affairs (OP-ODESLA) and the Office of the Ombudsman (OMB) to lead the implementation of the IMP.

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Dedication

Para sa aking mga anak na si Lucas at Elijah at sa mga bata sa beneyasyon na ito at sa mga susunod pa, naway lumaki sila sa isang mas ligtas at masaganang Pilipinas na malaya sa katinalian. (To my sons, Lucas and Elijah, and to all Filipino children of this generation and the generation to come, that you may enjoy a more secure and a healthier nation, free from corruption)

Abstract

This research paper focuses on how the anti-corruption called Integrity Management Program (IMP) in the Philippines affects the organizational and behavioral change in the public sector. A reality gap design and a case study of the Department of Social Welfare and Development (DSWD) were utilized to present the analytical framework for this paper.

The primary qualitative data were gathered through online interviews and were thematically analyzed to understand the gaps that exist between the context within which the anti-corruption program was formulated and the reality in its implementation.

The seven dimensions of anti-corruption namely; *objectives and values, information, funding, process, system, and management structure, staffing and skills, and milieu vis-à-vis the Integrity Management Program design* were utilized in making this analysis.

The findings of this research reveal that there are gaps that exist between design context and the reality of the implementation and that, IMP's contribution towards organizational and behavioral change is limited. In reality, however, more focus is allocated in perfecting the process/system of doing things and limited attention is given to control the effects on organizational culture and the individual behavior of personnel, resulting in the continuous existence of corruption in the delivery of public social welfare in the Philippines.

Relevance to Development Studies

The stigma of corruption is so vast that it affects almost everyone. It also affects sustainable development, therefore making the concept of governance linked with anti-corruption strategies. Public management reforms such as anti-corruption policies/programs play a crucial role in addressing corruption that hampers development. Whilst several types of research have been conducted about National Anti-corruption strategies, this research paper will focus on the mainstream of anti-corruption strategies. To this date, however; only a handful of researches were centered in the Philippine context. This paper does not assess Integrity Management Program as a “fail or success” anti-corruption program but seeks to find what lies in between the design of the program and the reality in the implementation, how the program was implemented and how this affects organizational and behavioral change to better IMP as a development solution to corruption.

Keywords

Corruption, Reforms, Governance, Anti-corruption, mainstreaming anti-corruption, Integrity Management Program, Department of Social Welfare and Development, Philippines

Chapter 1

Introduction

Over the years, corruption has become one of the most controversial issues that are widely talked about by many. In countries worldwide, corruption has dominated the news and conquered the newspapers and numerous websites featuring highly-influential personalities involved in the corruption scandal. Corruption by far has become the center for discussion among international, private institutions, politicians and civil organizations. Below are just a few of the news circulated online showing pervasiveness of corruption:

“Ex-Sudan leader said he received millions from Saudis, trial told” (Burke & Zainab 2019).

“We were promised change – but corruption and brutality still rule in Zimbabwe” (Mahere 2019).

“Italian prosecutors launch probe into Russia collusion allegations” (Matamoros 2019)

Regardless of economic and political standing corruption holds no boundaries. It is an issue that is relentless in its pursuit to conquer either fame or power. According to Hough (2013), it is one of the greatest evils of all time. The negative effect of corruption on humanity has led many social scientists over the years to conduct various research and studies to analyze its cause and effect (Hough 2013). Many leaders worldwide during summit meetings collaborate to discuss different counter-measures and its implementation to eradicate or at least minimize corruption so to speak.

Corruption according to Mustaq Khan is the behavior that deviates from the formal rules of conduct governing the actions of someone in a position of public authority because of private-regarding motives (Hough 2013). It is said that, regardless of scale and amount, “corruption is socially harmful” (Klitgaard 1988: 204) and “it is the poor who bear the largest burden of that cost, resulting to a lower level of social services, biased infrastructure, and higher taxes but fewer services”(Coronel 1998: 8). As people recognize the effects of corruption, anti-corruption becomes part of government reform strategies to counteract or prevent its negative effect. When one talks about anti-corruption “it is about incorporating measures to tackle corruption, it is all about ethics, governance, socio-economic policy, public administration and the like” (Hough 2013: 3).

Tied with the concept of anti-corruption is corruption, it is because of this that various anti-corruption strategies emerge. As part of governance reform agendas or strategies, the National Anti-corruption Strategy (NACS) or the Mainstreaming Anti-corruption Strategy (MACS) were implemented to help combat corruption. The NACS is the oldest known form of anti-corruption strategy that targets the overall governance of a country’s system, while MACS is considered to be more concrete and sector-specific based such as water and health (Heeks 2012). Regardless of forms and strategies, the objectives of these anti-corruption strategies are geared towards eradication of corruption if not, at least prevention. Despite the implementation of these strategies, however; corruption seems to flourish and continues to lurk into the society affecting the delivery of services to the people on both the private and public organizations.

Some argue that corruption is a necessary part of development such that for business firms “it is the grease that loosens the wheels of rigid and inefficient bureaucracy, contributing to development and modernization” (Rocamora 1998: 18). In the Philippines for example, corruption is linked to the country’s slow progression or development as a result of rampant bribery ranging from small favour to grand misuse of government funds (Rocamora 1998). As reported in Forbes Magazine, the Philippines cannot make a great leap forward from poverty to riches because corruption and political oppression remain constant regardless of changes in administration (Mourdoukoutas 2017).

As people recognize the effects of corruption in the country, government leaders implemented various anti-corruption initiatives, programs, and policies particularly in the public sector to educate people from the stigma of corruption. Despite these drives, corruption remains a hurdle to many Filipinos affecting the private organizations and public sector, involving officials and employees, either huge or in a form of petty cash. Is something wrong with these programs? Or has the implementation of these strategies been compromised? Is it the process/system or the values of the people within the organization? Will IMP a mainstreamed AC face the same fate as most of the NACS implemented worldwide?

This research will utilize IMP as a mainstreamed anti-corruption strategy and a thorough analysis will attempt to understand the missing link between a well- designed program and the reality in its implementation and how it can be used to determine the possible success or failure of IMP to address corruption at DSWD.

1.1. Research Problem Statement

According to Johnson et.al. (2012), most of the analysis of the outcomes of anti-corruption reforms has been centered on corruption risks in bureaucratic institutions or the so-called NACS. It addresses countrywide corruption, particularly, grand corruption and forms part of “direct reforms” which are economically and politically wider in scope. A lot of researches has already identified the reasons NACS has not been overly successful due to poor coordinating agencies, absence of technical advice and mentoring, and lack of monitoring (Hussmann et. al. 2009). Hussmann, et al. (2009) reiterated that the national anti-corruption strategies face the challenge not only for building bridges between the realms of corruption prevention and law enforcement but also in linking them adequately to other policies and reforms aimed at strengthening the country’s governance systems.

The NACS is not a *one size fits all approach* where all corruptions are address in each specific sector, thus “mainstreaming” anti-corruption has recently gained approval among benefactors and international organizations (Johnson et.al. 2012). Mainstreaming anti-corruption means “integrating an anti-corruption perspective into all activities and levels of an organization, a sector, or government policies that are of public interest” (Johnson et. al. 2012: 11).

Conducting critical research of the anti-corruption policy in certain sector will help shed light in understanding and obtaining crucial knowledge or pieces of information from a well-designed anti-corruption program which aims to curb corruption *vis-à-vis* the reality in the implementation of the program. Heeks (2012: 534) said that most anti-corruption initiatives in developing countries fail because of over-large “design-reality gaps”, that is, a great mismatch between the expectations built into their design as compared to on-the-ground realities in the context of their implementation.

1.2. Contextual Background

1.2.1. An overview of corruption and the different Anti-corruption Programs Implemented in the Philippines Public Sector

In the Philippines, corruption is prevalent in both public and private sectors, ranging from petty to grand corruption that involves staff from the lower level to high ranking officials. Perceived as one of the most corrupt nations in the Asia Pacific region according to the 2018 Corruption Perception Index, obtaining a score of 36, ranking 99th out of 180 countries (Flores 2019). This is evident as a record of grand corruption scandals involving higher officials in the Philippines which recorded as early as 1940, the Surplus War Scandal involving the then-president Manuel Roxas who allegedly pocketed \$90 Billion intended for the re-establishment of the Philippines economy (Jurado 2010). The Coco Levy Fund Scam involving Former President Ferdinand Marcos and other government officials who conspired to tax coconut farmers, in exchange of a promise for the development of the coconut industry and a share of the investments, but was used for personal profit by these officials (Jurado 2010). Among the very controversial was the Priority Development Assistant Fund (PDAF) scam involving businesswoman Janet Lim- Napoles and several other linked politicians with an estimated amount of PhP10 Billion public funds scammed (Conde 2007).

According to Bodegon (2017), petty corruptions are also common, where ordinary government employees directly deal with the citizens accepting bribes in exchange for speedier transactions such as police and traffic enforcers who take a small amount of cash in exchange for turning blind eye to traffic infractions. These among many others shows that corruption in the Philippines is so pervasive that it encompasses the entire bureaucracy from the bottom to the top (Bodegon 2017) which contributes to the inadequacy of the provision public services such as health, education, and social protection, thereby, making corruption as one of the most challenging governance problem afflicting the country.

The popularity of corruption on news media in the Philippines does not necessarily mean that the government is deficient in implementing its laws against corruption. Significant efforts have been made to combat corruption including legal and institutional reforms and initiatives, as well as efforts by civil society organizations and the media (Nawaz & Bridi 2005). Various laws and anti-corruption policies/programs have been promulgated to help combat corruption such as the Administrative Code of 1987,¹ Code of Conduct and Ethical Standards for Public Officials and Employees² and the Ombudsman act of 1989.³ Alongside these, there are also different anti-corruption programs patterned after the anti-corruption framework of the United Nations which led to Philippine government implementation of the Integrity Development Action Plan (IDAP) and Integrity Development Review (IDR), manage by the then Philippines Anti-Graft and Corruption Council (PAGC) Office of the President and the Office of the Ombudsman (OMB)⁴.

¹ Provides the basic policies, systems and procedures by which the Philippines government operates including administrative aspect.

² Also referred to as RA 6713 which enumerates the values of public officials and employees, including incentives and rewards for exemplary service, prohibited acts and transactions and their penalties thereof.

³ Provides the establishment of a government agency that is responsible taking positive and effective measures against corruption to ensure that integrity is uphold by government employees in the provision of public service

⁴ A constitutional commission in-charge to investigate and prosecute any act or omission of public officer and employee, office and agency, when such act or omissions appears to be illegal, unjust, improper, or inefficient.

In 2012, an evaluation of the implementation and outcomes IDR and IDAP made by Management Systems International (MSI) revealed that the oversight functions of the programs were found to be weak and inconsistent, capacity-building activities failed to achieve desired results, and there were minimal opportunities for interaction with the oversight agencies which could have facilitated timely feedback on implementation status (IMP Program Management Committee 2014). The evaluation also stated that measures were not integrated with the institution's core operations and, as a consequence, indicators were not agency-specific which means that action plans were not grounded at the institution's end (IMP Program Management Committee 2014).

The results of these initiatives have led to the harmonization of the two previous anti-corruption programs and institutionalization of the Integrity Management Program (IMP) through Executive Order 176 (EO 176), Series of 2014. IMP aims to “establish a systematic approach in building, improving, reinforcing and sustaining a culture of integrity in public sector institutions that are rooted in acceptable values, principles, and standards of good governance (IMP Handbook: 3). Unlike IDAP and IDR which are national anti-corruption strategies, IMP is characterized as an anti-corruption strategy labelled “mainstreaming” since it is an outcome-based initiative to “effect a directional change in integrity management across public sector institutions from their respective central authorities down to the different operative units” (IMP Program Management Committee 2014: 4). Mainstreamed anticorruption policies are a new approach in addressing corruption and not much research is done to analyze and evaluate its effectiveness, more so in the Philippine context.

1.2.2. Why Department of Social Welfare and Development as a Case Study?

DSWD operates with utmost accountability, integrity, and transparency through various internal controls and systems to ensure that its mandates are fulfilled appropriately. Data shows that DSWD is ranked and awarded as number one in the Integrity Development Action Plan and Integrity Development Review since 2007-2013 (DSWD Annual Report 2007 and 2010) and in 2015 to present has been the frontrunner in the implementation of IMP (DSWD ensures truthful 2019). Indeed, DSWD has been constantly one of the top performers in the implementation of various anti-corruption programs implemented by the government throughout the Philippines.

In 2009 the Department of Social Welfare and Development or DSWD used to have an annual budget of around Php 8.8 Billion pesos regular funds or 152,157 Euros to provide social protection services to the most vulnerable sector of the Philippines (COA 2018). These services include children in need of social protection, women in a difficult circumstance, disadvantaged youth and persons with disabilities. It also provides universal and transformative social protection to the Filipinos. In terms of responsibilities, it is wide in scope to include 16 Field Offices (FOs) and Attached Agencies (AAs).⁵The Department is in-charge of various social welfare programs such as Conditional Cash Transfer (CCT) of the Philippines. From 2015 to 2019 the annual budget allocation of DSWD has increased to PhP108.1 billion or 1.9 billion Euros which is roughly 100% increased. And as of 2019, it has a total budget of Php 138.6 billion or 2.4 billion Euros (DBM 2019).

Entrusted with huge responsibilities and large funds, DSWD, however, is not exempted from issues of corruption involving high ranking officials and employees. Even with the anti-

⁵ Attached Agencies includes Council for the Welfare of Children (CWC) Inter-Country Adoption Board (ICAB), Juvenile Justice and Welfare Council (JJWC) and the National Council on Disability Affairs (NCDA).

corruption program in place, corruption issues continue to shake DSWD's good reputation. In recent news, according to Delizo (2019), 5 DSWD officials allegedly accepted kickback amounting to PHP224 Million pesos to purchase family food packs for the Marawi Siege⁶ victims. This appalling news has brought about doubts and various inquiries on the credibility of DSWD to fight against corruption. What went wrong? Can the anti-corruption initiatives prevent corruption in DSWD?

1.3. Research Objectives

The main objective of this research paper is to analyze the outcomes of IMP as an anti-corruption program in DSWD vis-à-vis its implications in determining its success and failure as an anti-corruption program.

1.3.1. Research Questions

The main research question of this paper

To what extent does the implementation of IMP contribute to the organization and behavioral change at the Department of Social Welfare & Development?

Sub-questions to corroborate the main question

1. In relation to the anti-corruption components, how does IMP differ from the previous anti-corruption programs?
2. How is IMP mainstreamed in DSWD? What are the outcomes vis-à-vis IMP design assumptions?
3. What are the possible gaps between the IMP design context and the reality of the implementation?

1.4. Scope and Limitations

This paper will only cover the utility of the Integrity Management Program as a mainstreamed anti-corruption strategy and its effects on the organizational and behavioral aspects of the public sector specifically in the Department of Social Welfare and Development Offices, Bureaus, Services, Units, and Programs. The focus of the analysis is the IMP design context and the reality in the implementation context using the seven dimensions of a design-reality gap which covers, *Objectives and Values, Information, Process, Funding, Management System and Structure, Staffing and Skills, and Milieu*.

It also does not seek to find fault in the implementation of IMP in DSWD, rather; analyze 'possible' gaps between the program and its implementation leading to its possible success or failure. The result of this research will not include absolute remedy instead will recommend possible solutions and alternative actions towards the effectiveness of the implementation of the program. Finally, the study only covers responses from selected

⁶ Armed confrontation between Philippines government forces and Pro-ISIS militants in Marawi, Lanao del Sur, Philippines in 2017, displacing 98 percent of its total population.

program implementers and some officials and employees of DSWD who were directly involved in the implementation of IMP.

1.5. Organization of the Study

This paper is consists of five chapters. Chapter 1 includes the introduction with sub-sections on the research problem statement, an overview of corruption and anti-corruption in the Philippines, research objective and questions and the limitations of the study; Chapter 2 discusses the different concepts related to anti-corruption and the research paper analytical framework; Chapter 3 narrates the methodology of the research; Chapter 4 will cover the discussion and analysis; Chapter 5 will include the conclusions and recommendations.

Chapter 2

Anti-corruption concepts and the Study's Analytical Framework

This chapter discusses the concepts related to anti-corruption, which comprises corruption, governance, and reforms. The flow of chapter 2 starts with the (1) definition of corruption, types, and examples, causes of corruption and its effects, (2) governance and reforms (3) Anti-corruption and empirical evidence of its effectiveness and, (4) design-reality gap as this paper analytical framework.

2.1. Corruption: form, causes, and its effects

Corruption is defined differently by various international organizations such as United Nations (UN), Organization for Economic Co-operation and Development (OECD), Transparency International (TI), International Monetary Fund (IMF) and World Bank (WB). Corruption is commonly referred to as abuse of entrusted power for personal gain (United Nations Office on Drugs and Crimes 2004). WB, on the other hand, defines corruption as the “abuse of public office for private gain” (Fjeldstad & Isaksen 2008: 5). These definitions describe corruption in the public sector and it revolves around three important themes; *public office, public interest, and private gains* (Hough 2013: 3). These according to Hough (2013) pose various unethical and criminal acts that are broad in nature and narrow in form. On the other hand, Mustaq Khan defined corruption as a ‘behavior that deviates from the formal rules of conduct governing the actions of someone in a position of public authority because of private-regarding motives’ (Hough 2013). This definition touches the behavioral aspect of the nature of corruption and the repercussion of human behavior that affects an organization and society.

The diversity of the definition of corruption also entails diversity in its form and typology. This paper, however, discusses the common ground between the public sector and its relevance to the Philippines setting. In the public sector, there is what we call the political (*state capture*) and *bureaucratic corruption* where the difference is not much on the amount but the level at which it occurs (Council of Europe 2015). *Political corruption* takes place at the policy formulation end of politics and involves politicians, elected and appointed, with the highest level of political authority (Fjeldstad & Isaksen 2008). An example of this type of corruption includes tailor-fitting of regulations in exchange for a large amount of money from businesses or firms and embezzling of a huge amount of public funds (Fjeldstad & Isaksen 2008). Political corruption is described as *grand corruption* as it involves a large sum of money. On the other hand, *bureaucratic corruption* occurs at the administrative or bureaucratic level (Council of Europe 2015) that primarily involves the public staff that deals directly with clients or those who implement the rule/policy. An example of this type of corruption includes speed money to expedite public procedures and accepting bribes in exchange for favors. They are described as *petty corruption* since a small amount of money is involved (Fjeldstad & Isaksen 2008). These two types of corruption are interrelated and evidently, this socially implies that if corruption level is high and rampant at the highest level of the bureaucracy the higher the chances that corruption also exists at the lower level of the bureaucracy (Fjeldstad & Isaksen 2008: 6).

The common grounds of corruptions can be summarized as follow; (1) imbalance between the autonomy of institutions and independence of officials resulting to excessive

use of power/authority, (2) lack of professional ethics, deficient laws regulating corruption as criminal offense and poor sanctions which leads to lack of transparency and control in supervising institutions (Council of Europe 2015), (3) habits, custom, tradition, and demography causes corruption which most of the literature review includes as one of the reason why corruption exists (Sumah 2017). Countries differ in habits, customs, traditions, and demography, thus a corrupt act to some countries may not be considered corrupt to some (Council of Europe 2015). An example of this is, thanking someone by gift-giving; this may be an act of gratitude to some but maybe considered corruption elsewhere. Also, an informal social structure such as patriarchy breeds nepotism, cronyism, and patronage since lineage and connection becomes part of social security (Sumah 2017).

Among the above reasons, there is limited discussion on the third reason and in this paper, a focus is given to organizational culture and individual behavior/ values. First, we tackle *organizational culture*, which is defined as “a collection of unconscious beliefs and assumptions, which determine the values of the organization and, through these values, both organizational collective and individualistic actions of the organizations would be shaped” (Schein 1992: 16). The relationship between organizational culture and corruption may not appear to be immediate, but in a research entitled Causes of Corruption: Towards Contextual Theory of Corruption, showed that culture and structure of the organization within, affects individual behavior and that certain group of culture-leads to certain mental state and the mental state leads to corrupt behavior (De Graaf, 2007). In this paper, a focus is given to the concept of *corruption tolerance*, which is defined “as the willingness to justify dishonesty in the context of the public good that leads citizens to maximize private rather than public gains” (Malmberg 2018). High corruption tolerance results in rationalization or normalization of corrupt acts and are related to the assumption made by Klitgaard (1988) which stipulates that corruption is “contagious”, that once an organizational culture (country) is corrupt, every person who comes in contact with it also runs a big risk of becoming corrupt.

The second is *personal values* which refer to broad desirable goals that motivate people’s actions and serve as guiding principles in their lives (Sagiv et. al. 2017). It represents what is desirable or important to someone (Sagiv et. al. 2017), thus, if integrity is important to a public servant, he or she will be guided by this value, which affects his/ her decision to do or not to do a corrupt act. The reason why personal values are one of the root causes of corruption because of the assumption that corruption is determined by individual profit-seeking behavior (Torsello 2018). The “bad apple theory” in this paper is emphasized, which looks into the individual as a corrupt agent or the existence of people with faulty (moral) character, that is, bad character to corrupt acts (De Graaf 2007).

According to the Council of Europe (2015: 21) in the mid-1990 many people find the existence of corruption as more of an enabling factor, particularly for business purposes. However, recent studies suggest that this is not the case since corruption poses various negative consequences for democracy, the rule of law, social services and economic development (Council of Europe 2015: 22). Thus, when corruption is endemic, although institutions are in place, people may see it lacking and deficient, resulting in the loss of trust in the system.

Corruption affects the availability and quality of social services. A classic example would be the worldwide corruption involving conditional cash transfer programs where cash is supposed to send marginalized children to schools but in reality, the cash ends up in the pocket of scrupulous government officials. There are few reliable estimates of the actual magnitude of corruption and those that exist reveal a high level of heterogeneity (Olken & Pande 2011:3) that corruption whatever the level and whatever the form, has a negative impact on government’s provision of public goods and services.

2.2. Reforms, Governance, Anti-corruption, and Empirical Studies on its Effectiveness

The corruption eruption in the early 1990s led to public outcry for “war on corruption,” which then prompted countries to enact anti-corruption legislation to combat corruption (Naim, 2005: 96). The international policy community’s interest in corruption has significantly increased. Among the various international organizations, the United Nations was the first to publicly talk about corruption and has adopted the most comprehensive corruption convention to date (Olken & Pande 2011).

From 1998 to 2011, with 38 countries members, the Organization for Economic-Cooperation and Development (OECD) have ratified the Anti-bribery Convention; Transparency International (TI) that works together with government, businesses and citizens to stop corruption (Transparency International 2019); and World Bank (WB) launching the Strengthening World Bank Group Engagement on Governance and Anti-Corruption (GAC) strategy (Olken & Pande 2011). The international efforts of various intergovernmental organizations and other different working groups to combat corruption have played important role in setting the agenda of many governments to address corruption in different levels particularly corruptions that impedes development and hinders the effective and efficient delivery of public services (Bhargava & Bolongaita 2004: 38).

These international efforts led to the discussion of the concept of public sector reforms and governance. Public sector reforms are said to have emerged to address old and ineffective way of managing the government, “to reinvent government agencies, eliminate inefficiencies, and impose fiscal discipline (Brinkerhoff & Brinkerhoff 2015). Among various public reforms, governance reforms were among those that would help the government to address or counteract corruption and improve public service. “Governance is defined as the formation and stewardship of the rules that regulate the public realm- the space, as well as economic and societal actors, interact to make decisions (Hyden et. al. 2003). Although there are numerous ways in which governance is defined, the term, in essence, means improving various public policies to include an increase in public accountability, transparency and civil society participation (Fjeldstad & Isaksen 2008).

Although major international organizations at the beginning of the 1990s made several studies on “anti-corruption movement”, none has empirically tested its effectiveness (Charron 2011: 1). Most of these anti-corruption reforms were traditionally centered on corruption risks in bureaucratic institutions or the so-called direct reforms⁷, there are also indirect reforms, but such will not anymore be discussed in this paper. One of the examples of direct reforms is the National Anti-corruption Strategy (NACS) that focuses on addressing corruption at the national level. NACS is said to be central to donor’s anti-corruption efforts in developing countries (Johnson et.al. 2012). It is said that the NACS did not succeed and that the expectation that it will curb corruption is not met (Disch et. al. 2009). Heeks (2012) conducted research about understanding the success and failure of anti-corruption initiatives. NACS was utilized among the cases using Design- Reality Gap (DRG) as a framework for analysis. The result of the research showed that there is a mismatch between the design vis-à-vis the reality in the implementation and that there are 3 major DRG outcomes which include (Heeks 2012):

⁷ Example of these reforms are financial management reforms and justice sector reforms.

1. Small design reality gap right from the start- there is a small risk of failure, and a significant likelihood of successful implementation;
2. It starts with a large gap between design and reality. One outcome is that this gap remains large, and the project, therefore, fails in some way
3. Large initial gaps do not always end in failure. They may find a way – during implementation – to close those gaps and achieve success

The gap in this study was the donor objectives and values, the middle “O” dimension- which encompasses both politics and culture (Heeks 2012). The same findings were also made by Johnson et. al. (2012: 12) the reason why NACS fail because they are “incomplete, poorly designed and/ or badly implemented.” There were claims that NACS has a positive impact on governance and indeed contributes to reducing corruption (Goldsmith 2001) but there are only a few cases that support these claims and that empirical evidence is weak (Johnson et. al. 2012).

A re-orientation on the focus of the anti-corruption strategy called “mainstreaming” or the Mainstream Anti-corruption Strategy (MACS) is gaining popularity among donors and policymakers of which interventions are focused on addressing corruption in sector-based service delivery (Johnson et. al. 2012). MACS takes into account specificities to include sector expertise and country-specific thus anti-corruption measures are more effective, translate concrete results and are more feasible (Boehm 2014). There are arguments that state that MACS may lead reformers to lose sight of broader corruption, that it is less sustainable, and results in displacing corruption from one sector to another (Johnson et. al. 2012). Given that this is a relatively new focus, there is not much evidence that has actually been produced to tests the effectiveness of the mainstreaming approach. Alongside this, the organizational culture in policymaking and counter-measure to combat corruption are limited particularly in the social welfare sector to understanding how a set of values and norms within the organization can affect an individual or employee’s decision towards corruption. Thus, the focus of this paper is looking into IMP as a concrete example of MACS implemented in the public sector in the Philippines and its contribution to the Department of Social Welfare and Development system and behavioral change.

2.3. Design- Reality Gap, the Framework in Understanding IMP and Analysing its Outcomes

Design- reality gap framework was first used by Suchman in 1987 for the discussion of social construction technology and by Venkatraman in 1989 for organization change design (Dasuki et. al. 2015). This was later on developed by Richard Heeks to analyze organization change and the risk associated with it (Dasuki et. al. 2015: 3). The framework was used as a tool to measure the success of projects emphasizing that gap exists between the project design and what happens on the ground (Dasuki et. al. 2015: 3). This framework was also used by Heeks in analyzing the success and failure of anti-corruption programs in developing countries (Heeks & Mathisen 2012). Anti-corruption programs are said to have seven (7) key features which labeled as “ITPOSMO”, which stands for:

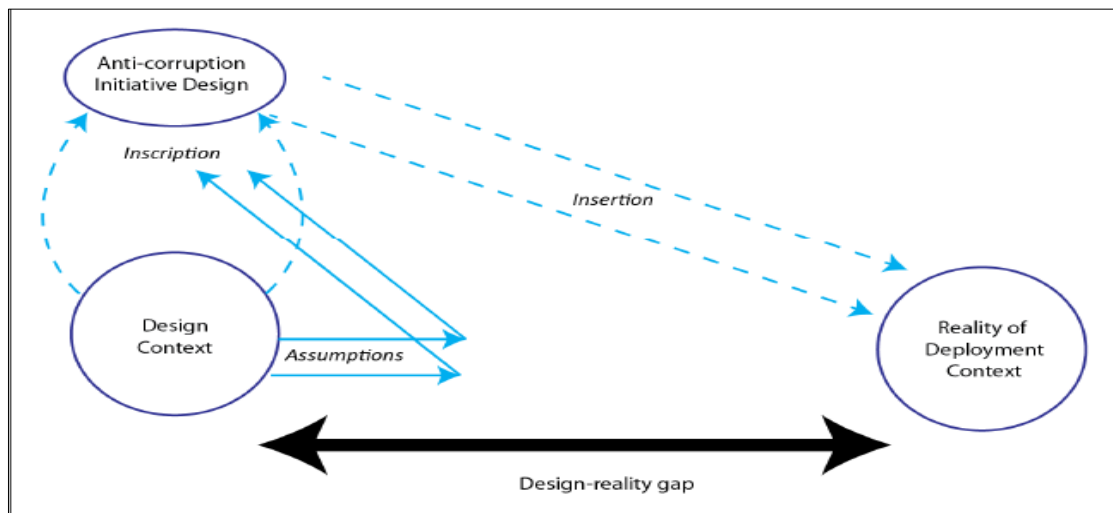
Table 2.3
DRG Dimensions (ITPOSMO)

Information	both formal and informal
Technology⁸	mainly information technology
Processes	from individual tasks to broader business processes
Objectives and values	covering formal strategies and personal goals and the influence of informal institutional forces
Staffing and skills	the quantitative and qualitative aspects of competencies
Management systems and structures	the formal aspects of an organization
Other resources⁹	especially time and money

Source: Heeks and Mathisen (2012)

Using these dimensions, there are two contexts in which analysis is done as shown in figure 2, this context includes Design Context (DC) and the reality of deployment context (RDC). DC refers to the assumptions and inscriptions built into the anti-corruption design (Heeks, 2012). RDC refers to the insertion process or how is the anti-corruption program implemented in a certain country or sector. Heeks & Mathisen (2012) postulated that the more are the gaps, the more that anti-corruption is at risk of failure. Heeks (2011) used DRG and its dimension to analyze gaps quantitatively using a point system. This paper, however, will use DRG to qualitatively analyze the possible gaps that exist between how IMP was design and the reality of its implementation in the Social Welfare sector.

Figure 2.3
Design- Reality Gap Framework



Source: Design reality gap model by Heeks (2011)

⁸ As used in the design- reality gap model develop by Richards Heeks about Information Technology research.

⁹ Used in the original DRG on Information Technology research but was customized to 'milieu' as used in the paper on education curriculum in Africa

2.3.1. Design Context (DC)

Based on the literature review, most anti-corruption reforms are designed by a group of people or international organizations or entities. As such, they are generally a part of a globally diffused knowledge, skills, and techniques, technologies, and tools- mostly from industrialized to developing countries (Heeks 2012). IMP is the result of an assessment conducted by a third party consultant and adopts the framework of the international standards and practices on anti-corruption measures under the United Nations Convention against Corruption (UNCAC), it is a joint initiative of the existing integrity development programs of the Office of the President and the Office of the Ombudsman (IMP Program Management Committee 2014). Thus, contextually its elements fall within the principles of a state's domestic law.

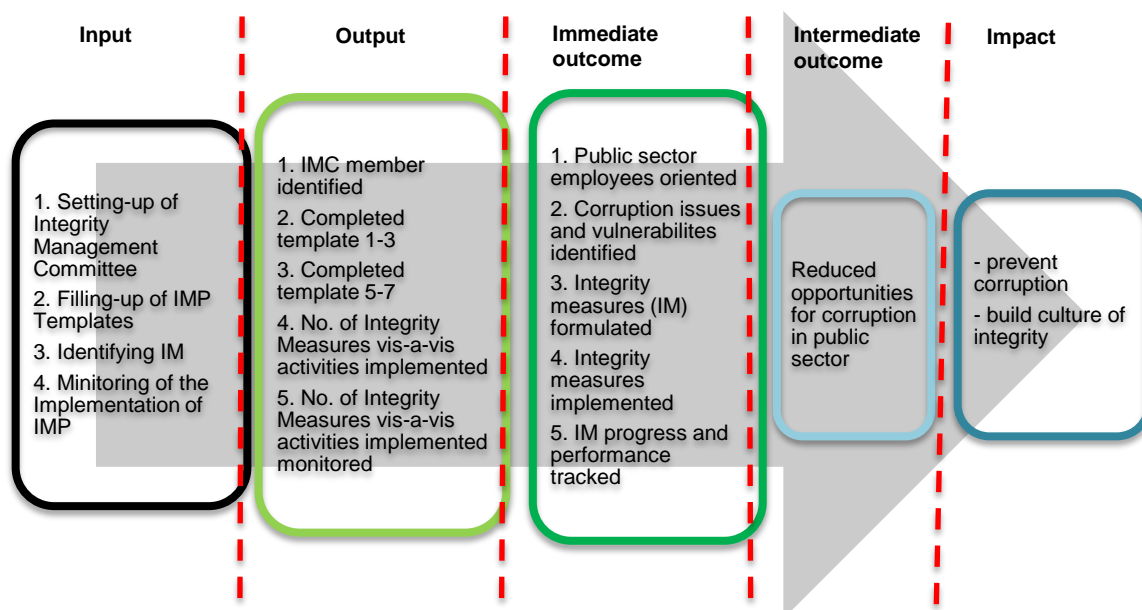
Table 2.3.1
IMP Inscriptions

Objectives	Inscription on the Institutional Level
Implementation of IMP will prevent corruption in the public sector Build a culture of integrity in the public sector	Setting-up an Integrity Management Committee
	Conducting Integrity Assessment
	Developing an Integrity Management Plan
	Implementing the Integrity Management Plan
	Monitoring and Evaluation of the Integrity Management Plan

Source: (IMP Program Management Committee, 2014)

In this paper, DC includes assumptions of IMP as an anti-corruption program and the assumptions have major stages/ inscriptions as shown in table 2.3.1 above.

Figure 2.3.1
IMP Logical Framework



This figure is conceptualized by the author and patterned after the MSI Evaluation Framework

The figure 2.3.1 above shows that once the IMP related activities are implemented the immediate results includes IMC members identified, IMP templates are completed, integrity measure and activities are identified. These then in effect result in public sector employees oriented about IMP, vulnerabilities and corruption risks identified and mitigated as well as monitored. The outcome of this is corruption opportunities are reduced in the public sector and further curb corruption and build a culture of integrity.

2.3.2. The Reality in the Implementation

To be able to properly analyze the gaps that exist between the IMP and the reality in its implementation in DSWD, there is a need to look into the context of DSWD as the user. RDC then includes DSWD management structure, resources, systems and existing institutional values that will make IMP “fit” as an anti-corruption program leading to corruption prevention and build the culture of integrity in DSWD. The comprehensive analysis of the data will be completed using both assumptions and inscriptions and the seven dimensions. Presented in table 2.3.2 are the relevant dimensions and their interpretation which are relevant to this research paper.

Table 2.3.2
Design- Reality Gap Dimension Relevant to the Research Paper¹⁰

Dimensions	Interpretation of the Framework Relevant to the Research Paper
Objectives and Values	Objectives and values that users need for successful implementation of IMP vis-à-vis DSWD current objectives and values
Information	Information design tools inscribed in the IMP design vis-à-vis information tools used to implement IMP in DSWD
Funding	Funding required as part of the program design vis-à-vis availability of funds to support DSWD IMP related activities
Process	Process inscribed to successfully implement the IMP vis-à-vis process undertaken in the implementation of IMP in DSWD
Staffing and Skills	Staffing skills and number needed to successfully implement IMP vis-à-vis current staff number and skills DSWD employs
Management Systems and Structures	Management systems and structure required vis-à-vis real situation now
Milieu (legal and political)	Legal and political support required vis-à-vis the support that IMP related activities receive in DSWD

Source: Adopted from the Design- Reality Gap Example by Heeks and Matthisen (2012)

The above inscriptions presented in table 2.3.2 will be used to properly discussed IMP vis-à-vis reality in the implementation context. Table 2.3.2 presents the dimensions relevant to the research and its descriptions. With the use of DRG, the gaps are identified and outcomes are analyzed so that the implementation of IMP and its effects in the organizational and behavioral change in DSWD is fully comprehended. Hence, the results will be presented in the discussion and analysis in Chapter 4.

¹⁰ Please note that in lieu of technology funding was added since the research paper is not related to Information technology and also emphasize the important of funding in the implementation of anti-corruption program. Also, the other resources was changed to milieu to highlight the legal, and political aspect of IMP.

Chapter 3

Research Methodology

This paper employed the qualitative research method following a naturalistic inquiry that seeks to understand social phenomena through the experiences of human beings “meaning-making agents” in society (Jackson et. al. 2007). A case study was initiated since the study geared on the contemporary phenomenon (Gerring 2007) of anti-corruption. The design-reality gap framework was also employed to scrutinize and evaluate the different aspects of IMP implemented in DSWD. The information was gathered through a desk review of primary data, online interviews, and thematic analysis of the responses from the interviewee.

3.1. Review of IMP and DSWD IMP Related Documents and Key Informants Online Interview

The data used in this paper regarding IMP are considered the primary inputs utilized to address the questions for this paper. This data includes reports, documents, program handbooks and other unpublished reports during my time as the team leader and Monitoring and Evaluation Officer (MEO) of the DSWD Integrity Management Committee Secretariat from at DSWD from 2015-2018.

Fieldwork was not included in the data collection of this paper so that the primary source of data comprises the online interviews. This methodology was singlehandedly selected because of the nature of a qualitative interview which is considered to be more reliable. A qualitative interview produces immediate results and direct interaction between the researcher and the respondents/ interviewer to the interviewee.

Some of the common online interview gateway options include the synchronous real-time online interview that involves messaging or chatting via audio or video call (Salmons 2010). This paper utilized the question and answer online dialogue including video, voice-over-internet protocol (VOIP) at the chat room to establish communication. This was a necessary action to analyze the information provided by the respondents of this paper. Hence, the results of the qualitative interview were used to answer the main question and sub-questions 3, and 4. The following were the key informant interviewee that I was able to interview:

Table 3.1
Key Informants for Online Interview Code

Number of Interviewees	Position	Code
3	IMP Coach	C1-C3
2	DSWD CO-IMC Secretariat	S1-S2
14	Management Audit Analyst (MAA)	MAA1- MAA 14
19	Total number of the interviewee	

Before the interview, as part of the protocol for gathering data in DSWD, a formal email letter was sent to the Assistant Secretary for Special Concern, (the coach monitor for the implementation of IMP throughout DSWD) for permission to initiate data gathering. The letter contained a background of the RP, the request for interview along with possible dates,

the request for a copy of documents, and a copy of the guide questionnaires. The interviews were conducted based on the agreed time and in consideration of the time difference between the Philippines and The Hague. Some interviews were conducted 2 to 3 times as a result of inconclusive results due to time constraints.

A total of 19 interviews were performed as part of the data gathering procedure. These interviews include (1) Skype voice call, 2 Hangouts voice calls, 2 Messenger voice calls, 1 Viber call, and the rest were performed through Facebook messenger video calls. The variations in the medium used were in conjunction with the interviewees' availability and convenience. Of these interviews, some were conducted during weekdays in between and after work hours in the Philippines while others took place during the weekend.

The interviewees include representatives from the Program Management Committee one (1) from the Office of the President- Office of the Deputy Executive Secretary for Legal Affairs (OP-ODESLA)¹¹ and two (2) from the Office of the Ombudsman (OMB)¹², all work closely with DSWD which are usually called, IMP coaches. One (1) representative from the Integrity Management Committee (IMC) and also the Head of the IMC- Secretariat was also interviewed along with one (1) staff. Fourteen (14) Management and Audit Analysts were interviewed representing field offices from Luzon, Visayas, and Mindanao in the Philippines. My personal experience as the team leader for four 4 years in the implementation of IMP in DSWD was also utilized to substantiate the data collection for this paper. The data collected from multiple reports and documents in the implementation of IMP were gathered and utilized as a part of the primary data. The secondary data were from several published government documents including news articles, researches, and reports of international organizations that were also procured as part of the literature review contents.

3.2. Thematic Data Analysis

Thematic analysis is defined as “a method for identifying, analyzing, and reporting patterns within the data” (Baun & Clarke 2006). A thematic analysis was employed to identify common themes across interview data. This is because this paper utilized the qualitative research methodology and data gathering was personally procured after conducting a series of interviews for this RP.

I lay-out all the interviews that I've transcribed in an excel file using a personalized manual coding in the same file in a different sheet. The feedbacks (in a form of verbal response) were coded by themes relevant to the DRG dimensions for accessibility. The other feedbacks were directly quoted for transparency and validation of research results. The following are the themes I used for this research paper with sample response.

¹¹ Created under the Office of the President has jurisdiction to investigate on its own, or receipt of complaints, violations of the anti-graft laws by presidential appointees.

¹² Act as a watchdog and a dispenser of justice and charged with 5 major functions: investigation, prosecution, administrative adjudication, public assistance, and graft prevention.

Table 3.2
Themes and Samples

Themes	Sample Response
Gaps	"lack of funding" (MAA 1- 14) "lack of staff" (MAA 1-14) "there is a need to train not just the head of office or unit but also other staff" (MAA 1 and 2)
Effects relevant to organizational change	"corruption risks were identified and mitigated" (MAA 1-14, S1 and S2) "systems and processed were assessed" (MAA 1-14, S1 and S2) "Integrity measures were identified relevant to the identified corruption risks" (MAA 1-14, S1 and S2)
Effects relevant to behavioral change	"informed on the values of accountability, transparency and Integrity" (MAA 1-14, S1 and S2) "reminded of the conduct of public employees" (MAA 1-14, S1 and S2)
Positive outcomes/ facilitating factors	"Support from the Vice Chairperson" (C1-C3) "Active IMC Secretariat" (S1 and C1-3, MAA 1-14)

3.3. Risks and Ethical Problem

One of the risks involved in this research is the possibility of not obtaining the primary data. This is because obtaining information from government agencies is not easy and the topic is case-sensitive matter. However, my knowledge of the Freedom of Information Bill ¹³ and my awareness of the protocol involved in obtaining data from DSWD became my strongest weapon, thereby, making it possible for me to obtain the necessary information needed to comply with this research paper. Hence, my 5 years of employment at DSWD increased my confidence in accomplishing this paper with lesser inhibitions.

Whilst it can be said that my position can form certain biases in terms of my direct involvement with DSWD, it is with strong conviction that I will endeavor to be more objective with my views and perception and shall exhibit with the utmost professionalism with my critiques and interpretation of my research findings. A thorough analysis shall be employed to ensure the validity of the research paper. Thus, respondents involved in this paper shall be kept in great confidentiality to ensure their safety and avoid conflicts of interest.

¹³ **Executive Order No. 02**, also known as the **Freedom of Information (FOI) Program**, on 23 July 2016 in Davao City. The Executive Order established the first Freedom of Information (FOI) Program in the Philippines covering all government offices under the Executive Branch. It requires all executive departments, agencies, bureaus, and offices to disclose public records, contracts, transactions, and any information requested by a member of the public, except for matters affecting national security and other information that falls under the inventory of exceptions.

Chapter 4

Discussions and Analysis

This Chapter is divided into 2 parts. The first part includes all information about the previous anti-corruption program implemented in DSWD, detail description of IMP components and how IMP was mainstreamed in DSWD's National Office and Field Offices OBSUs and Programs. This part also answers the first 2 sub-questions, it defines IMP, describes the context of how it is designed and its difference from the previously implemented anti-corruption program. The second part is an analysis of the outcomes of IMP using the design-reality gap framework using the seven dimensions. This part seeks to answer the 3rd question regarding the outcomes of the implementation of IMP in DSWD, its implications and the challenges that the IMP user experience in the implementation.

4.1. Background on the Anti-corruption Predecessors and IMP

Prior to the approval of the institutionalization of IMP, the anti-corruption in place are the Integrity Development Action Plan (IDAP) and Integrity Development Review (IDR), implemented by the Presidential Anti- Graft Council (PAGC)¹⁴ and Office of the Ombudsman (OMB) respectively (Management Systems International, 2012). Table 4.1 describes the different components of these AC and how they differ in terms of these components.

Table 4.1
Anti-corruption Components (AC) of the previously implemented Anti-corruption Program (ACP) in DSWD

AC Components	Findings		
	IDAP	IDR	IMP
Policymaker	Cabinet Secretaries	Office of the Ombudsman	Resulted from an assessment conducted by an international consultant Guidelines (handbook) developed the Program Management Committee (PMC)
Oversight agencies/policy implementers	Presidential Anti-Graft Commission (PAGC)	Office of the Ombudsman	OP-DESLA and OMB
Objective	Boost executive departments ¹⁵ in addressing corruption	"Determine the cause of inefficiency, red tape, mismanagement, fraud, and	Prevent corruption and build the culture of integrity in the public sector

¹⁴ The agency in-charge of investigating graft cases during the presidency of Fidel V. Ramos, which was later on dissolve and its functions were transferred to the Office of the President-Office of the Deputy Executive Secretary for Legal Affairs (OP-DESLA)

¹⁵ The largest part of Philippines bureaucracy, heads are members of the Cabinet of the Philippines. Includes Department of Trade, Department of Interior and Local Government, Department of Budget and Management, Department of Environment and Natural Resources, Department of Labor and Employment, Department of Agriculture, Department of National Defense, Department of Education, Department of Transportation, Department of Health, DSWD, Department of Public Works and Highways, Department of Foreign Affairs, Department of Justice, Department of Agrarian Reform, Department of Finance, Department of Energy, Department of Science and Technology, Department of Tourism, National Intelligence Coordinating Agency, Office of the President, Housing and Urban Development Coordinating Council,

		corruption in the Government and make recommendations for their elimination and the observance of high standards of ethics and efficiency”	
Framework	National Anti-Corruption Framework of the Executive Branch with 22 anti-corruption measures or “doable”	The legal framework in pursuance to constitutional and statutory mandates [Sec.13 (7), Article XI of the Constitution] and statutory [Sec.15 (7), Republic Act 6770]	UNCAC Framework but mainstreamed to the public sector but tools used are subject to changes based on the needs of the agency
Elements	Prevention, Education, investigation and enforcement, and strategic partnership	Corruption Resistance Review (CRR) Covers 10 Dimensions ¹⁶ and Corruption Vulnerabilities Assessment (CVA)	integrity measures elements (Service Delivery, Institutional Leadership, Financial, Procurement and Asset Management, Human Resource Management and Development, Corruption Risk Management, and Internal Reporting and Investigation)
Implementation Strategies and tools	“Doable” should be accomplished by the agencies with action indicators or sub-measures. Agencies are then assessed based on the accomplished doable on 5 point scale including agency self-assessment. Implementation is guided by PAGC including the crafting of indicators.	Walkthrough and agencies are assessed of their corruption resistance and vulnerabilities Used Corruption Resistance Review (CRR) and Corruption Vulnerabilities Assessment (CVA) as tools 5 point scale and self-assessment	Accomplishing of IMP 7 templates, done once for a period of 5 years Assessment and Certification will be done after 3-5 years of implementation
Number of Users	As of 2010, 217 agencies, regional, government-owned and controlled corporations and government financial institutions including DSWD	Piloted in OMB, Civil Service and Department of Education and 22 public institutions including DSWD	19 including DSWD

Source: Evaluation Report of Management System International (2012) and IMP Handbook (2014)

Both IDAP and IDR are examples of NACS that were implemented in pursuit of promoting good governance “through useful and readily implementable measures (IMP Program Management Committee 2014: 5). IDR was pilot-tested and designed to be a systematic tool to determine an institution’s resistance and vulnerability to corruption. IDAP on the other hand, which was formulated in 2004, was the national anti-corruption framework of the executive branch composed of 22 anti-corruption measures or “doable” (Management Systems International 2012). These programs were handed by the anti-corruption committee of the Office of the President and the Office of the Ombudsman to the different agencies in the Philippines (Management Systems International 2012). At the institutional level support by the top management and the leaders were important for its smooth implementation and compliance and the users of these programs were mandated to comply while demerit markings were imposed for non-compliance” (C2).

National Anti-Poverty Commission, Fertilizer and Pesticide Authority, Philippine Executive Commission, National Water Resources Board.

¹⁶ Leadership, Code of Conduct, Gifts and Benefits Policy, Human Resource Management, Procurement Management, Financial Management, Performance Management, Corruption Risk Management, Whistleblowing, Internal Reporting and Investigation, and Interface with External Stakeholders.

After 5 years of implementation, both IDAP and IDR were assessed by the Management System International (MSI) in 2012 whereby, its weaknesses were established. These weaknesses comprise of; *poor oversight functions, capacity building desired results were not achieved, weak line of communication between the oversight agencies and the users, and lack of appropriate monitoring and evaluation system.* Thus, to bring harmony between IDAP and IDR, IMP was created which addressed their shortcomings to facilitate change while retaining good elements of the previous AC programs.

4.2. Mainstreaming IMP in DSWD

An executive briefing was conducted and the DSWD Integrity Management Committee (IMC) was created in December 2014 to provide focus and to simplify the promotion of integrity and corruption-prevention campaigns in the Department (IM Plan Version 1 2015). The department participated in the pilot implementation of the IMP together with four other government agencies which include the Department of Health (DOH), Department of Justice (DOJ), Department of Public Works and Highways (DPWH) and Bureau of Internal Revenue (BIR). The implementation was facilitated by the OP-ODESLA and OMB with the support from the previous DSWD Secretary, the Departments' Executive and Management Committee.

During the pilot implementation in DSWD, 2 offices and 3 programs¹⁷ were included which later paved the way for the adoption of the IMPlan version 1 as reviewed and endorsed by the DSWD Integrity Management Committee (IMC) and submitted to the PMC in June 2015.¹⁸ Furthermore, with the funding assistance of WB amounting \$20,000 in 2015 the IMC Secretariat conducted IMP roll-out to 6 pilot Field Offices (FOs)¹⁹ which later on resulted in the crafting IMPlan version 2.²⁰ Later-on other FOs and OBS in the CO were also oriented about IMP. As a result, IMP was mainstreamed in the process and systems of the different OBS of DSWD.

The narrative below is my observations coupled with my experience on the implementation of IMP in DSWD OBS:

Through the IMP orientation, the participants were asked to identify the critical systems for assessment which were ranked in the IMP template 1. The operating systems were ranked through the following criteria; a) high impact, b) high Developmental and c) pro-poor. Once the critical operations were identified, only the top 3 of these will then be assessed by the process owner with the directives from the directors through a participatory system review with their respective division/offices using the IMP template 2. This process involves identifying vulnerability in each step. After completing template 2, the process owner will then complete the corruption risk register (template 3) based on the examples risks identified

¹⁷ Social Pension, Standard Bureau, Pantawid Pamilyang Pilipino Program (CCT), Disaster Response Assistance and Management Bureau, Sustainable Livelihood Program.

¹⁸ Reported in the unpublished Integrity Management Plan Version 1, submitted by the DSWD Integrity Management Secretariat to the OP-ODESLA and the OMB in June 2015.

¹⁹ DSWD operates in the different local level through the Field Offices (16), the pilot FO's includes DSWD Field Offices II, III, V, IX, CARAGA.

²⁰ Included in the unpublished report of the Internal Audit Service entitled Internal Audit Service and Integrity Management Program Accomplishment Report 2010-2016.

in the IMP handbook such as bribery, conflict of interest, and collusion. The identified corruption risks are then rated based on probability and likelihood, 1 being the lowest and 5 being the highest. The identified corruption risks with 3 to 5 ratings, the process owner then drafts the integrity measures or the mitigating controls incorporating the elements of the IMP (as enumerated in table 5 of the IMP components under elements) this is laid down in IMP template 3A. Template 3A will be used as a basis in completing template 5 using the IMP logical framework, which is a tool in developing a strategic response to the result of the integrity assessment (IMP Handbook 2014).

When the first 4 steps are accomplished, the process owner at this stage drafts a 5-year Integrity Management Plan (IMP template 6), that will comprise the activity, the budgetary requirements, and the timeline. A draft of the monitoring and evaluation plan will also be carried out using the IMP template 7 that shows *the targets, the means of verifications and the indicators* of the integrity measures identified, as well as the activities to be implemented (IMP Handbook 2014). This is a continuous process and the process owner cannot proceed to the succeeding steps unless the previous steps are carried out successfully.

At the end of the orientation, the templates are expected to be finalized after a thorough consultation with the other employees in the OBS and approval from the Director. Once templates are approved, they are submitted to the IMC Secretariat for review and consolidation. The consolidated assessment report (IMP template 4) is accomplished by the IMC secretariat, deliberated and approved by IMC Chairperson (DSWD Secretary). Finally, this assessment report is submitted to the program management committee as proof that the DSWD has completed the conduct of the Integrity Assessment and Integrity Management Plan (refer to Annex E for copies of IMP Templates).

4.3. Analyzing outcomes of IMP using the Design- Reality Gap Framework

Following the narrative background on how IMP was mainstreamed in DSWD in the earlier chapter, this part seeks to discuss and establish the reality of the outcomes of the implementation of IMP in DSWD using the dimensions of the DRG framework. The discussions are arranged and presented in the following order: Dimension- Design Expectation (DE)-Reality (R)-Design Reality Gap (DRG). The findings from primary data included design expectation and the real part while the results of the interview including my personal experiences are included in the design-reality gap part which is the analysis of this paper.

Note that I have replaced technology to funding since the program which I've analyzed does not touch this dimension and other resources to the milieu, taking into consideration the anti-corruption context. Thus, from ITPOSMO to OIFPSMM.

4.3.1. Objectives and Values

Design Expectations

The main objective of IMP is corruption prevention and building a culture of integrity in the public sector. It also reinforces three important elements of integrity (*see below*) to promote change in the management process of the public sector. As stated in the Integrity Management Handbook (2014) the following are the elements:

- “*Individual and institutional values* as stipulated in Republic Act 6713 which includes a commitment to the public interest, professionalism, justness, and sincerity, political

neutrality, responsiveness to the public, nationalism and patriotism, commitment to democracy and simple living.” (IMP Program Management Committee 2014:10-11)

- “*Principles of conduct* represents accepted and professed rule of conduct of a person or institution of moral principles adopting the UNCAC 2003 good governance principles.” (IMP Program Management Committee 2014:11-12)
- “*Adherence to standards* which requires that all measures and rules adhere to local and international standards both legal and regulatory in all public institutions in the delivery of public service.” (IMP Program Management Committee 2014: 12-13)

Reality

The objectives and the core values of IMP are shared among the employees of DSWD particularly those who are part of the IMP, the process owners who prepare the reports and those who are able to participate in various IMP campaigns in DSWD, as well as those at the central and field offices including Attached Agencies with DSWD. In the same way, the integrity measures are identified to mitigate corruption risks of systems and processes which adhere to the values and the elements prescribed in the IMP handbook. Sadly, despite the set of values, standards, and rules in place including the presence of IMP as its anti-corruption program, the issue of corruption is still rampant within the confines of DSWD.

In 2018, the Commission of Audit or COA reported that there were some lapses in the implementation of some programs and violations of laws, rules, and standards which affected the fair distribution of funds and delivery of social services (COA 2018). Also, it was reported that some DSWD officials and employees were indicted and dismissed due to gross negligence of duty and prejudicial conduct (Caliwan (2018).

“There are inconsistencies between the written rules and guidelines and how they are interpreted and applied in the performance of duties. The reason why there are still corruption issues surrounding some programs of DSWD could be ignorance of the law or they have knowledge of the law, but because someone with authority tells them to do something, even though it is against their values and against the law, they need to do it because not doing it means you are going against someone with authority. Another possible reason is that corrupt acts are not punished, we have some officials who were accused of doing corrupt acts but only a few of them are charged and punished. In the same way, culturally, our corruption tolerance is so high that we end up tolerating corruption even it is in the highest form” (S1).

Design- Reality Gap

The reason why these gaps exist because there is a mismatch between the internal written values and organizational culture of DSWD to that of the individual espoused values. The organizational culture of DSWD as seen in the response of one of the interviewees includes organization high corruption tolerance is also one of the reasons why corruption in DSWD happens this was also emphasized by Bhargava & Bolongaita (2004) in their research on the root cause of corruption in the Philippines. The interviewee emphasizes that there are public officials and employees who were caught doing corrupt acts but only a few were punished. Also, since public sectors in the Philippines are bureaucratic in nature employees in DSWD lack professional autonomy, whereby their decisions are influenced by higher officials, which

result to doing corrupt act even against their will and the law. Individually, employees act not just in accordance with the organizations' values, but also in accordance with his/her individual deeply rooted values. So much so, that in the "bad apple theory" the root cause of corruption is found in the defective human character (De Graaf, 2007). As such, even DSWD has good systems in place, because of the presence of employees with faulty moral character, corruption continues.

4.3.2. Information

Design Expectations

Information flows from the Program Management Committee (PMC) to the Integrity Management Committee (IMC) at the agency level Integrity and vice versa. The PMC that functions as the coach monitor provides orientation and technical assistance to disseminate information regarding IMP. The success of the program lies in the effectiveness of the information processes and the tools that are provided by the PMC to DSWD employees particularly those who are directly involved in its implementation.

Reality

Information flow

The flow of information between PMC and DSWD- IMC is well established. As a state during the interview *"it is easy to communicate to the DSWD IMC Secretariat, thus the request for technical assistance and queries are easily acted upon, compared to other agencies"* (C2). At the institutional level, the flow of information from the IMC Secretariat to CO offices including the employees and field offices are relatively easy. The availability of different communication tools to facilitate technical assistance and quick response to queries from the IMC Secretariat provide comfort to MAA, therefore, making their experience pleasant.

Information Dissemination

PMC has to disseminate two important information that PMC at the Department of Social Work & Development or DSWD. Firstly, it involves the filling-up of forms involved in the major process as stated in table 3. These templates are necessary for the implementation of IMP. Secondly, it comprises the mainstreaming of values and elements of IMP on the system and processes so that employees may embrace the values as they carry out their duties as public servants.

Based on my experience and my encounter with the respondents involved in this paper, it was evident that the DSWD IMC Secretariats is greatly involved in the dissemination of the program's values and objectives through its various campaigns and promotions across the Philippine peninsula. On the other hand, when it comes to the process or the technical aspect of the implementation of IMP (such as the filling-up of forms), it can be said that the opportunity to attend the IMP orientation is narrow for the vast majority. Hence, the technical assistance provided by the IMC Secretariat also becomes difficult to acquire due to the increasing priorities and time constraints. Below are some of the comments mentioned by the majority of the MAAs:

"Dissemination of information is limited to the unit heads and selected technical staff who are selected to attend the orientation."

“Those who attended the orientation also mentioned that there is still part of the process that is unclear due to insufficient time and too much information”.

“The various IMP campaigns and promotions are great, but dissemination is rather limited to just the DSWD Central Office”.

Design- Reality Gap

With the established information flow, there is a minimal gap in this dimension to include the limitations in terms of coverage in the implementation of the IMP campaign. Aside from this, knowledge about the process is limited which can be attributed to the lack of clarity of the IMP process and the capacity of the individual involved in the IMP orientation. However, to address these gaps, the IMC Secretariat made sure that technical assistance is provided to capacitate people in-charge of IMP implementation in OBS, as well as the sharing of the communication plan, were OBS can replicate.

4.3.3. Funding

Design Expectations

Section of 8 of EO 176, series of 2014 states that:

“Departments/Agencies are mandated to allocate sufficient funds/resources for the implementation of the IMP and the establishment of the IMS, as well as the implementation of their Department/Agency’s Integrity Management Plans, which shall be charged against the current appropriations from their maintenance, operations, and overhead expenditures (MOOE) budget. Thereafter, funding for the succeeding years shall be incorporated in their regular appropriations.” (IMP Program Management Committee 2014)

Reality

Government funding is usually limited, and allocation is primarily based on priority. Whilst the implementation of IMP in DSWD has the full support of the management, funding is rather limited to some extent thereby restricting IMP related activities. According to one of the IMC Secretariat staff:

“Budget for the implementation of IMP related activities is just a “ride- on to the budget of internal audit service budget.”

The same goes to the majority of the field offices where 70% of the MAA said that:

“Budget is limited and that they need to find ways to secure the budget for IMP related activities. Although sometimes we find ways to raise funding, oftentimes luck is not on our side. The inadequacy of funding results in the cancellation of activities which in turn affects FO’s performance in the implementation of IMP”.

Design- Reality Gap

The lack of concrete funding percentage by the EO has made the IMP related activities least of the priority in terms of budget allocation, resulting in limited integrity measure implementation. To address this gap, a representative of the IMC-Secretariat participated in

the budget planning and deliberation to ensure that all OBS IMP related activities are allocated in the budget proposal. However, the decision on the allocation of the budget intended for the IMP activities does not stop after planning and deliberation, in reality, the budget allocation can be highly politicized (Heeks & Mathisen 2012) during the approval of which are influenced by what the official sees as a priority.

4.3.4. Process

Design Expectations

Table 4.3.4
5 major stages in the implementation IMP and the Timeline

Inscription	Details	Timeline
Setting-up an Integrity Management Committee	Identifying Officials who will be part of the agencies IMC including the approval of administrative order	4 weeks
Conducting Integrity Assessment	Identifying critical systems and operation, vulnerabilities, and corruption risks	4 weeks
Developing an Integrity Management Plan	Identify integrity measures and activities to mitigate corruption risks, crafting of IMP	4 weeks
Implementing the Integrity Management Plan	Conduct of activities as stated in the IM Plan to mitigate corruption risks	4 weeks
Monitoring and Evaluation of the Integrity Management Plan	Monitor implementation of the IM plan	Continuous after the above activities

Source: Integrity Management Handbook

The PMC, which is characterized as mainstreamed anti-corruption, must orient the public sector on the objectives, values, and process of IMP. A public sector who wishes to implement IMP needs to request technical assistance from the PMC. It is at the discretion of the agency to execute the undertaking of the process. PMC will only assist if needed and when submissions are done for review and deliberation.

Reality

Process

The module of the orientation for IMP was developed by DSWD which provides a guide to complete the IMP template, the duration of the orientation was four days. DSWD disseminates its wide orientation to the national, regional and attached agencies with the support of the PMC, DSWD management, and the animated IMC Secretariat.

Based on the interviews conducted, the time allotted for the orientation was insufficient, taking into consideration that there were seven templates to accomplish, most interviewees said that they experienced “information overload” (Assessment Report 2019). As the former team leader of the IMC Secretariat, the mainstreaming of IMP has resulted in overwhelming tasks in reviewing several templates and in monitoring more than a hundred activities for DSWD-wide IM Plan. This was also experienced by the MAA since most of them operate as a one-man team in the monitoring of the implementation of IMP. Though the PMC is happy on how DSWD is performing in the implementation of IMP, a member of the PMC said that:

“DSWD was fast in the implementation, we want to do it step- by- step, one process at a time to be more accurate in terms of identifying gaps, corruption risks, and integrity measures.”

Organization Outcomes

The implementation of IMP resulted in some DSWD employees being oriented toward the values and the process of the program. With the knowledge gained they were able to accomplish various templates, systems/ processes of DSWD OBS were assessed and various corruption vulnerabilities and risks were identified. 71% of the identified corruption risks are program risks (such as CCT and Social Pension) and 29 % are administrative risks (such human resource). Common and highest occurrence corruption risk across DSWD for programs are fraud, collusion, favoritism, and misuse of funds while for administrative is favoritism and collusion. Risks identified are categorized under bureaucratic corruption which involves staff that directly deals with the beneficiaries. With the identified risks IM's were identified and formulated to improve service delivery, procurement, and financial management, human resource, internal reporting and investigation and audit, risk management, and institutional leadership.

Outcomes

What was unique in the module was the inclusion of values that oriented participants on the values of accountability, transparency, and integrity. To also raise awareness, a communication plan was developed, and various activities were implemented at the national level internally, IEC materials were developed and produce, and the IMP campaign was launch (Please refer to Annex A). These activities increase awareness and some MAAs who have been working in DSWD for a long time emphasized that:

“It reminded us of the value of integrity and the choice that we have to take when confronted with the situation to do or not to do corrupt act.”

Design- Reality Gap

For this dimension, no significant gap was identified since the IMC Secretariat was able to implement various activities as part of ensuring that IMP is DSWD-wide implemented. However, as noted by one of the IMP coach and also based on my experience, I find the first part of the orientation of the IMP in the 6 pilots FO's done in a rush, orientation of the IMP templates were done in just 4 days which as mentioned resulted to information overload and templates not properly accomplished. This shortcoming was addressed since each FO's were given a certain timeline to properly fill-up the templates and the IMC Secretariat were also available to conduct technical assistance upon request and if needed. It is also an accomplishment since the orientation module developed by DSWD were used by various public sector institution for IMP orientation.

4.3.5. Management Systems and Structures

Design Expectations

Management System

The implementation of IMP is guided by the six (6) elements of integrity measures as enumerated in Chapter table 3. Once the public sector was able to identify the corruption risks, integrity measures should be aligned with these six (6) dimensions, this is to ensure that the integrity measures vis-à-vis the activities identified will address the corruption risk. These applied along with the IMP values.

Management Structure

As stated in the IMP Handbook (2014), the program is managed by the Program Management Committee composed of employees of OP-ODESLA and OMB with PMC members called technical secretariat or “coaches” most of them are from the OP-ODESLA and OMB who provides technical assistance to public sector and monitor its implementation and evaluate its implementation, alongside provision of capacity building towards effective roll-out of IMP. They work hand-in-hand with the agencies IMC which composed of department executive and management committee members, a representative from the rank and file employees and a CSO representative in the implementation and sustainability of IMP.

IMC oversees and ensure effective implementation of all IMP initiative, facilitates planning, develop a communication plan, implement the program in the central office and all field offices, monitor and review accomplishments and regularly meet to discuss hindering factors in the implementation.

The implementation of IMP per agency should be assessed and evaluated within 3-5 years after its implementation and certification is given to the public sector who complied with the IMPs certification requirements (please see Annex B for certification level).

Reality

Management System

Though the orientation provided DSWD employees the information on how to incorporate the six elements in crafting the integrity measures, such exposure, however, was insufficient to fully comprehend the implementation of IMP. This was made known after the 4 years of the IMP implementation. One of the reasons cited was due to obsolete integrity measures resulting from the changes in the programs and guidelines. Hence, a revision was suggested to address the corruption risks.

To ensure compliance of DSWD OBS in the implementation of IMP, the IMC Secretariat push to make IMP related deliverables in the Office Performance Contract and Individual Performance Contract (IPC). Below is the common response of MAAs:

“Except for the points that we have for the performance evaluation for complying in the implementation of IMP, we are not in any way rewarded or additional incentives are not given”. But we find the tasks related to IMP rewarding, it reminds us of what we have to do as public servants.”

Management Structure

The DSWD Secretary chairs the IMC and the executive and management committee acts as members. Reports, assessments, and other documents about the implementation of IMP are reviewed and approved by these officials. However, given the long list of responsibilities of the Executive and Management Committee, the need to prioritize can be a setback in terms of fulfilling their role expectations.

In my observation as MEO for IMC Secretariat, when IMC members are scheduled to convene for discussion (usually at least every after two months) a representative attends the meeting instead of the IMC members. This representative can be a technical or administrative staff, who do not have the authority to make a decision, usually hampers the entire decision-making process. The interest and goals of the members can also affect the support they give in the program, thus if IMP is not relevant to their interest and goals, support in the implementation will be minimal or none at all.

To provide the necessary support needed in the implementation of IMP, DSWD IMC Secretariat was created to; a) oversee the implementation, monitoring, and evaluation of IMP, b) provide technical assistance to OBS upon request and if necessary, c) and implement various IMP campaigns. The IMC Secretariat is headed by the Internal Audit Service Director, IMC Secretariat head. At the regional offices level, the Regional IMC (RIMC) is headed by the Field Office Director and its members are composed of the head of different OBS and programs.

Design- Reality Gap

Aside from the gap in the limited participation of some top management officials, there is a relatively small design-reality gap due to the DSWD Secretary's supports and the active participation of IMC Vice-Chairperson (Assistant Secretary) in the different IMP related activities. The IMC Secretariats' active role in the implementation of IMP is also very significant as they provide the needed support to expedite the process and ensure that IMP related activities are properly implemented.

4.3.6. Staffing and Skills

Design Expectations

As presented in part 4.3.5 of this chapter, the institutional level of the DSWD CO- IMC is filled-up as prescribed in the IMP handbook.

Reality

At the national level DSWD IMC is created and the counterpart of this at the FO level is called Regional IMC (RIMC) membership to the committee is supported by a Special Order or S.O (see sample SO in Annex C). As stated above DSWD CO created the IMC Secretariat and the counterpart of this at the FO level is the Regional IMC Secretariat CO IMC Secretariat. It is composed of 4 staff, which is usually a one-man team composed of the MAA. Skills of IMC Secretariat staff and some of the MAA are sufficient and yearly IMP related pieces of training are provided to them.

As per the IMP report, positions created for IMC Secretariat are Cost of Service (COS) or Memorandum of Agreement (MOA) employment status, thus, they do not receive benefits that the regular employees receive such as health care benefits, insurance, and bonuses. At the regional level, the high turn-over rate of MAA is a problem since salaries are low, with a high level of responsibilities. The IMP related tasks are an add-on to the Audit functions of the MAA. Also, knowledge transfer on IMP is limited because of the high turn-over rate of staff. At present 19% of the MAAs are new and 7 out of the 14 that were interviewed didn't undergo formal IMP orientation.

Design- Reality Gap

Gaps in this dimension are significant. This comprises the following; 1) overwhelming workloads, 2) under-staff, 3) no additional and personal incentives, and 4) contractual employment status of the IMC Secretariat. These gaps if not addressed may result in resistance to comply with IMP requirements since IMP related tasks are considered an add-on to the regular tasks that the staff performs. Personal incentives and the lack of security on the job lessens both extrinsic and intrinsic motivation which in effect makes the staff disinterested in the implementation of IMP. These findings are similar to the result of the survey conducted by Boehm (2014: 3) that staff lack of internal capacities and incentives 'causes the failure of anti-corruption to achieve desired results'.

4.3.7. Milieu

Design Expectations

Legally IMP is supported by EO 176, Series 2014 signed by the previous president and also included in the present administration Philippines Development Plan of 2016-2020.

Reality

There is no DSWD administrative order institutionalizing IMP except for the EO, which is a special order for the creation of IMC and RIMC. Funding support, however, is limited. The inclusion of IMP OPC and IPC deliverables compels the implementation of IMP at the regional level. This is because it affects performance rating and the number of performance benefits that they will receive.

Design- Reality Gap

Political and legal aspect gaps are significant since it is supported by an EO. The IMPs' effectivity, leadership, and funding support are at risk. The reason why most anticorruption policies fail as they say is the lack of political will, this is because political leadership and commitment are pre-requisite for initiating and sustaining reforms (Kukutschka 2014). Power holders should be able to politically champion and push reforms to support anti-corruption programs along with laws that will effectively enforce these programs. Unless these gaps are addressed, IMP will suffer the same fate as the other anti-corruption programs.

Chapter 5

Conclusion and Recommendation

Most research on anti-corruption in the Philippines context is substantially on NACS. This paper is taking a big step to assess the impact of MACS in terms of change in the organizational and behavioral aspects of the public sector, in particular, the social welfare in the Philippines context.

In relation to the first sub-question, we find significant differences between the previously implemented anti-corruption and IMP in terms of AC components which include elements, framework, and implementation process and tools.

First, characterized as a mainstream anti-corruption, compare to readily implementable measures of the previous AC program, IMP allows the public sector to assess their systems, identify vulnerabilities and corruption risks, craft integrity measures, and implement activities to mitigate the corruption risks. This process is carried out using the templates in the IMP handbook where the public sector can customize depending on their needs. Context wise, the emphasis is given on the reality within which the sector operates and pinpoint corruption risks at the process and system-specific of units, offices, and services, thus root causes are addressed, and integrity measures become more specific. This leads to the integration of the values and elements of IMP into all activities and levels of DSWD to narrowly define each unit, offices and services objectives such as procurement, human resource, and financial management services.

Second, the previous anti-corruption programs emphasize the legal, constitutional, statutory framework to which the program operates. The IMP, on the other hand, focuses on individual, institutional and principles of conduct of government officials and employees emphasizing the building of the culture of integrity in the public sector.

Lastly, compared to a 5-point scale rating given to the public sector, the PMC is required to conduct a thorough evaluation of the implementation of the IMP and shall be assessed based on their level of achievement. A certificate is awarded to recognize the exemplary performance of the agency which can be level 1- for bronze, level 2- silver, and level 3 gold (IMP Program Management Committee 2014).

Concerning the second sub-question, the IMP was mainstreamed through the various inscriptions or major stages prescribed in the IMP handbook. In DSWD, various activities were implemented such as executive briefing, IMP orientation that includes accomplishing templates and values orientation workshops. Alongside these, several IMP campaigns and activities were also implemented to emphasize the values of accountability, transparency, and integrity. Mainstreaming the anti-corruption program resulted in the identification of system vulnerabilities, identifying corruption risks, identifying integrity measures and activities to mitigate corruption risks. It also increases DSWD employees' awareness of the conduct required of a public servant, in particular, the values of accountability, transparency, and integrity. Though, introduced by the PMC or the oversight agencies, top management support in the implementation of anti-corruption makes DSWD a long-time consistent and the number one anti-corruption champion among the public sector. Indeed, it gives importance to one of its values, that is, "*serbisyon walang pumang sa katinalian*" (service with no room for corruption).

Lastly, we deal with the last sub-question and look into gaps that exist between the design context and the reality of the implementation.

First, the objectives and values of the anti-corruption are shared within the organization such that the IMP values match that of DSWD organizational values. But was it wrong? In the context of DSWD, its organizational culture the analysis resembles that of a “rotten coconut”, on the outside the organization appeared to adhere to rational management norms but beyond the immediate appearance, the inner reality is driven by quite different informal institutional values” (Heeks, 2012). These informal institutional values are habitually practiced by a few or group of people or the so-called “bad apples”, but because they represent DSWD, once caught doing corrupt act the whole DSWD image is affected. This is a very good example of the dyadic relationship between individuals and organizations, that is: “individual beliefs and values can shape organizational culture and organizational norms and values shape individual beliefs and values” (Hechanova et. al. 2014). Also, the high culture of corruption tolerance leaves most corruption acts unpunished thus corrupt acts are normalized through rationalization, where self-serving ideologies develop to justify corruption” (Ashforth & Vikas, 2003, p. 1).

Objectives and values go hand in hand with the Management Systems and Structure dimension. System wise no significant gaps between IMP Design and implementation in DSWD. There is, however, a need to look into the management structure and the role of the other IMC members. The support of the leaders is necessary and for them to comply with the norms both that of IMP and the DSWD is to develop their sense of moral obligation, ensuring that compliance is in accordance with their self-interest and social control (Egeberg 2003). Relatively, the importance of professional autonomy should also be emphasized to address the problems in manipulating or influencing the decision-making process (Egeberg, 2003: 124).

Second, gaps in funding are not new as the gap that exists among anti-corruption implementation, thus the same is applied to IMP as the mainstreamed anti-corruption program. The result of the implementation of the program identified integrity measures and activities that needed to be implemented. The overwhelming number of activities will require DSWD a huge amount of money in which DSWD has fallen short of. This gap spillover affects the staffing and skills dimension. As coverage of IMP increases, the present number of staff is faced with a bigger task of monitoring and evaluating the implementation of IMP, in particular, the field offices. Due to funding limitations, tasks that require 4-5 personnel are left in the hands of 1 to 2 employees, thereby, affecting the compliance rate and quality of reportorial requirements. This will result in the increase of the turn-over rate whereby, DSWD employees who are trained to perform IMP related tasks, will no longer be properly rewarded and motivated since the program itself only provides institutional or organizational recognition with no provision on the rewards for individuals.

Third, the IMP process is too technocratic or too much focus is involved in assessing and enhancing processes but lacks strategic implementation of programs that will contribute to culture and behavioral change. However, on the part of DSWD, it is advancing towards attaining IMP objective of building the culture of integrity by raising awareness and the implementation of various IMP campaigns but needs to improve in terms of the extent of coverage to include all DSWD stakeholders.

Lastly, the identified gaps in milieu significantly contribute to the gaps identified in the other dimensions. IMP is not institutionalized in the Philippines bureaucracy. It is politically and legally weak, thus affecting prioritization in terms of implementation and funding.

Based on the 3 identified outcomes enumerated in page 8, the outcome of the DRG analysis in this paper is likened to the 3rd outcome, large initial gaps are identified but the Program Management Committee and the DSWD during the implementation were able to identify ways as to how to close these gaps. To say that IMP as an anti-corruption program is a failure is underrated since the implementation of IMP contributed to some organizational and behavioral changes. To say that IMP is a success is also overrated since there is still a need to close the gaps that addressed both the cultural or behavioral dimensions of the program. Therefore, to answer this paper's main question I conclude that, at present, organizational and behavioral change in the implementation of IMP in DSWD is limited only to the identification of vulnerabilities, corruption risks, and integrity measures as well as awareness of the values of accountability, transparency, and integrity. There is still a long way to go for IMP to have a concrete output that contributes towards curbing corruption and in building the culture of integrity in the public sector but what is important is that with little steps, both the PMC and DSWD are working towards this ultimate goal.

As to policy recommendations, DSWD should at least, at this point, have learned a lot from the previous anti-corruption programs that AC's are beyond identifying vulnerabilities, corruption risks, and identifying mitigating controls. It is about making sure that integrity as a value is clearly defined and articulated in the organization's objectives along with strict enforcement of standards using the existing guidelines, rules, and policies. It is important to emphasize what is acceptable and not acceptable and that these are understood across all DSWD employees. There is a need to break the expectation that corruption will continue by making sure that offenders are identified and punished.

Also, to address the gap on personal values, aside from clarifying the role of employees in integrity building, there is a need to incentivize or reward reformers and as well as negative incentives to offenders. Instead of just making leaders a good example in the practice of integrity systems that provides better incentive is better than moral reforms (Klitgaard (2015: 40) and since integrity is personal and building it is a long process, strategizing incentives and sanctions that influence both individual values and norms are necessary.

The implementation of the anti-corruption program also entails the planning and implementation of practical and feasible strategies with the use of the organization's available resources. To do this, DSWD should prioritize corruption risks that need immediate fixing, those that are mostly known to the public such as risks in the CCT, Social Pension, disaster response, and other ace programs. This strategy, as discussed by Klitgaard (2015: 40) can shift public expectations that things change and therefore building support both for deeper and long-term reforms.

On the part of the policy implementer, PMC should be politically motivated to institutionalize the implementation of IMP. Most of the anti-corruption fails because it is not supported politically and legally, to ensure that this will not happen to IMP, a consistent and committed policy implementers should not only be technically adept but also must be persistent to develop regulations and standard operating procedures that will make the program a high priority in terms of support. Program implementers should be able to gather, mobilize and coordinate resources, not just financial but also human and technology needed in the implementation of IMP.

This research contributes to the literature on anti-corruption policies in the Philippines that presents how mainstreaming anti-corruption strategies affected change in a specific public sector. This paper will add to the existing literature on how the design- reality gap can be used to conduct qualitative research and analysis of the outcome of anti-corruption

strategies. In addition, the research adds to the empirical evidence that culture and individual behavior and values are one of the reasons why corruption persists.

Finally, areas for future research can include a comparative analysis of how IMP affected change among various public sectors or is it a success or a failure? Also, since there are various reasons (such as high corruption tolerance, organization culture, and individual values) as to why corruption persists, it will be very relevant to conduct further research on which among these reasons are common in various public sectors to improve the implementation of the anti-corruption programs and initiatives and to highly contextualized inscription in the Philippines context.

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Annexes

Annex A

Sample of DSWD IMP Campaign Implemented



As a follow-up to the DSWD Service Theme 'Kaya Ko Ang Pagbabago', this year's communication plan has the theme **'Ituloy Natin ang Pagbabago tungo sa DSWD na IMPanalo'**. We are emphasizing that what we are doing now is just a continuation of our previous efforts to attain positive change in the Department.

Our aspiration towards having a culture of integrity in the bureaucracy is one of our ways to aspire for reforms in the systems and processes of the government that will benefit its stakeholders most especially the public which it caters to.

The theme also is a testimony that if you believe in something and do something about it for it happen, it will happen. The same concept applies in achieving a culture of integrity within an organization. However, a strong belief is not enough to make things happen. As the saying goes 'Faith without action is dead'. In achieving a culture of integrity in the department, teamwork is an essential tool. You can never achieve integrity with just one person making efforts to practically demonstrate behaviors attributed to it.

It is now the task of all the stakeholders of DSWD to unite, work and continue for achieving a culture of integrity in the department thus encouraging them to carry the battle cry **'Ituloy Natin ang Pagbabago tungo sa DSWD na IMPanalo'**

Annex B
IMP Certification Level

Gold: A Culture of Organizational Stewardship	Performance Rating of 14-15 + central and regional/field office-wide implementation of IMP + trust rating of at least 75% or at least an increment of 25%
Silver: A Culture of Accountability	Performance Rating of 11-13 + central office-wide implementation of IMP with selected regional offices full implementation + trust rating of at least 65% or at least an increment of 15%
Bronze: A Culture of Commitment	Performance Rating of 9-10 + central office-wide implementation of IMP + trust rating of at least 55% or at least an increment of 10%

Annex C
Sample of Special Order of Integrity Management Committee



SPECIAL ORDER

NO. _____

Series of 2017

Subject: Designation of DSWD Central Office Integrity Management Committee (IMC) Members

To ensure the continuity and strengthening of the Integrity Management Program implementation in DSWD and in conformity with *Executive Order 176, Series of 2015, and Section 6. Composition of the IMC*, the below structure will be followed in assigning members of Central Office IMC:

Designation	Description
Chairperson	<i>Head of the Agency, Secretary</i>
Vice-Chairperson	<i>Assistant Secretary</i>
Members	<i>ExeCom and ManCom Members</i>
Alternate Members	<i>Division Chief or Technical Staff with at least Salary Grade 20</i>
Head of IMC Secretariat	<i>Head of Internal Audit</i>
CSO Representative/s	<i>A representative of relevant CSO/s chosen by the department/agency, in accordance with the Guidelines on CSO Participation in the IMP.</i>

Let copies of this order be distributed to all Field Offices and OBSUS at Central Office for their information and guidance.

Issued this ____ day of November 2017 in Quezon City.

Secretary

Annex D

List of Unpublished Documents

DSWD IMP Related Documents

1. Integrity Management Plan Version 1 (2015)
2. Internal Audit Service and Integrity Management Plan Accomplishment Report 2010- 2016
3. Integrity Management Plan Version 2 (2017)
4. IMP Kamustahan, Review and Assessment Report FO CARAGA (2019)
5. IMP Kamustahan, Review and Assessment Report FO III (2018)
6. IMP Kamustahan, Review and Assessment Report FO II (2018)

PMC IMP Related Documents

1. Assessment of the Effectiveness of the Integrity Development Action Plan (IDAP) and Integrity Development Review (IDR) Implementation at the Agency level (2012)

Annex E

IMP Templates

Template 1 Critical System

Operational Systems	Minimum Criteria				Ranking
	High Impact	Highly Developmental	Pro-Poor	Other Criteria	
				e.g. AAR Findings	

Template 2 Process Matrix

Step	Description of the Steps	Accountable Office/Staff	Inputs Needed (Incoming documents)	Output (Outgoing documents)	Duration	Remarks (gaps, issues, etc.)
						e.g. delays of the process, no existing policy, wide discretion, no criteria, deviations from policy, lack of monitoring, lack of accountability

Template 3 Corruption Risk Register

Name of OBSU:									
Risk Identification			Risk Analysis		Risk Evaluation				Risk Treatment
Critical Process	Risk Name	Risk Description	PROBABILITY	IMPACT	Risk Rating	Current	Residual Risk	Risk	Integrity
			5- Almost Certain	5- Severe/Catastrophic		Mitigating Controls		Acceptance	Measures
			4- Likely/Often	4- Major	(P+I)		Rev. P + Rev. I		Output:
			3- Possible/Sometimes	3- Moderate	2		2	Unacceptable = 4-5	a)Policy
			2- Unlikely/Occasionally	2- Minor				Tolerable = 3 Acceptable = 1-2	b)System
			1- Very Unexpected/Rare	1- Insignificant					c)Program
From T-2									

Template 3A Integrity Measures

Risk Name and Risk Description	Residual Risk Rating	Values	Principles	Standards	Measures	Output
Derived from the Risk register form T-3	Derived from risk register from T-3					

Template 5 IM Plan Logical Framework

Integrity Management Plan Logical Framework				
	(a) Program Logic/ Narrative	(b) Indicators	(c) Means of Verification	(d) Assumptions/ Risks
(e) Goal				
(f) Purpose				
(g) Outputs (Integrity Measures) :				
(h) Activities				

Template 6 Integrity Management Implementation Plan

Integrity Management Implementation Plan							
Integrity Measures	Activities (Sorted by Initiatives)	Person/Unit Responsible	Budget/Resource Needs (PHP)				
			Y1	Y2	Y3	Y4	Y5
Copy from T-3	Copy from T-5	copy from T-2					
Grand Total							

Template 7 IMP Monitoring and Evaluation Plan

Monitoring and Evaluation Plan						
Program Logic/ Narrative Copy from T-5	Indicators Copy from T-5	Baseline	Targets	Source of Data	Frequency of Data Collection	Person/Unit Responsible
Goal						
Purpose						
Outputs (Integrity Measures)						
A) Policy						
B) System						
C) Program						
Activities						

Templates Source: DSWD Integrity Management Plan Version 2