Understanding the Underlying Values, Norms and Behaviors Constraining the Implementation of Administrative Sanction in the Ugandan Public Service

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Executive Summary

Why?

The Strengthening Uganda's Anti-Corruption Response (SUGAR) facility has been supporting the implementation of the 2009 Anti-Corruption Act for over five years. One aspect of this is their support to the government in its' implementation of Section 46 of the Act, which provides for the removal of public servants convicted of corruption from the payroll and pension. Yet in 2018, 28 convicted officers were still on payroll, and four were receiving their pension. SUGAR had expended significant effort to support key government institutions in a range of technical capacities such as case support, development of a case referral mechanism, and improved processes with accompanying manuals. This inquiry was in response to the realization that these technical responses, while necessary, would not be sufficient to ensure implementation of Section 46.

What are Social Norms?

Social norms are the mutual expectations about what is typical and appropriate behavior within a group of people. They are held in place by positive reinforcement when one complies with the informal rule, and negative sanctions when one breaks the rule. Social norms dictate behaviors but should not be equated with the behavior itself. They also differ from attitudes and values, which are individually held and derived, not dependent on what others think or do. While they are not the only factor, or even always the most significant factor, social norms can exert a very powerful influence on behavior—so much so that in certain cases individuals will comply with the norm even when it is contrary to their personal value or attitudes on the matter.

What?

In the last quarter of 2019, SUGAR initiated an inquiry into the underlying norms and values that drive the resistance to the removal of public servants convicted of corruption in accordance with Section 46 of the Anti-Corruption Act. Conducted by a three-person team with combined expertise in corruption, social norms, systems mapping, and Ugandan history and politics, the inquiry used participatory processes with JSC, ODPP, IG, and PSC officials to develop a visual representation of the problem using causal loop mapping. This approach is based on systems thinking and is uniquely effective at analyzing complex problems in a way that helps identify potential responses. The resulting map depicts the various factors that influence the implementation (or lack thereof) of Section 46 and the dynamics among them. These intersecting, self-reinforcing cycles are buttressed and often driven by social norms that make behaviors difficult to change. Key social norms have been identified and overlaid onto the map to show their influence on behavior.

What are Values?

Values are individually held standards of behavior regarding the right way to behave in a given situation. They transcend place and time. They differ from social norms in that values are personally held, while social norms exist in relationship with others.

Why is Section 46 Not Consistently Implemented?

The challenges to implementing Section 46 are a complex web of interconnected factors. Some are related specifically to Section 46, while others are more general challenges within the public service as a whole that manifest in behaviors that undermine implementation of Section 46. It is the interaction of the social norms with institutional factors, values, and incentives that lead to the lack of consistent implementation of Section 46. We therefore analyze the problem in a holistic way, as no factor operates alone.

- **Law and Policies:** Implementing Section 46 is about applying the law, yet PSC perceives a discrepancy between the law and policy. This results in each institution having a different interpretation of the correct course of action. For consistent application of Section 46, however, multiple government institutions must act in a coherent manner. PSC's stance is heavily influenced by their value of "treating people right" (i.e., humanely, with courtesy). Differing interpretations cause institutional friction and enable public servants to act in self-interested ways – a behavior that itself is influenced by the social norm common in the public sector: "protect your own". As a result, cases are not concluded and there are few consequences for being corrupt, signaling to other public servants that the law is not a concern and thus no longer a deterrent.

- **Lack of Communication and Coordination**: The institutional friction caused by these differing approaches obscures the fact that the agencies are working toward the same goal. Failure to consider this key point catalyzes much bad behavior (e.g., suspicion and distrust) between agencies, diminishing much needed communication between the institutions. Without interaction, institutional friction worsens even more.

- **Political Interference:** The social norm "protect your own" also drives much political interference in the administrative sanction process, as powerful people act to prevent consequences for convicted public servants within their network. This inaction on administrative sanction is further exacerbated by the expectation within the public service to "not contribute directly to an administrative sanction process" (another social norm). As files do not move forward, convicted individuals continue to work and are able to continue with corrupt behavior. Corruption is normalized, further reducing the notion that law is a deterrent and enabling greater political interference.

- **Retribution:** With convicted people remaining in the system, the likelihood that they will seek retribution against those who participated in either the court or administrative sanction process against them increases. This creates a climate of fear, which generates tension within institutions and further hinders action to remove the convicted people. Fear of retribution is increased when the politically powerful use administrative sanctions as a tool to 'fast track' a person out of their position who is at odds with the powerful person.

- **Patronage-Driven Leadership:** Appointment to senior positions of individuals who know how to work the system and are involved in corruption creates a vicious cycle. These appointees are beholden to the political godparent and extended network such that decisions become dependent upon connections. The social norm "serve your boss (even out of bounds)" that exists within the informal vertical hierarchy exacerbates this dependence. Knowing decisions are based on connections feeds a fear of victimization in the event one accidentally makes an enemy by making a "wrong" decision. The result is compromised decision-making. The influence of the social norms "serve your boss" and "protect your own" reinforces the dependence of choices on what will keep people aligned to their network, rather than what is the rule or what is right. People feel trapped—they have no choice but to comply—and thus are "forced" to engage in even more corrupt behavior, normalizing corruption. For many civil servants, this is an untenable environment, so they leave the public service or take positions without political sensitivities, thus diminishing the pool of potentially high-qualified candidates for appointments to senior positions.

- **Limited Professional Development and Motivation:** It is difficult to maintain motivation when promotions are not dependent upon merit, working conditions are poor, and salary levels are low. Low motivation is exacerbated by a prevalent mindset (mental model) of "don't make life too hard" for yourself. This acts as an implicit filter that helps civil servants make sense of their environment and guides their decisions in the direction that requires the least effort. Without motivation to perform well, there is little emphasis on seeking out professional development – a factor that contributes to brain drain. With limited incentive or initiative to stay current with the law and changing procedures, existing practices become the go-to way for new staff to understand and stay abreast of what is required of them. Existing practices are also reinforced with the PSC, by their social norm of "consultation". As many of these practices do not align with the official rules and procedures, cases get delayed and workload increases. A heavy workload and, as participants remarked, a culture of "laziness", continue to demotivate public officials.

- **Overarching Value:** Cross cutting all these dynamics is a pervasive value among civil servants of "help your own". Being of assistance to people in your network is widely accepted as the right way to behave. This value buttresses the social norm "protect your own", making any related behaviors that much more entrenched.

Image 1:

The System Behind Section 46
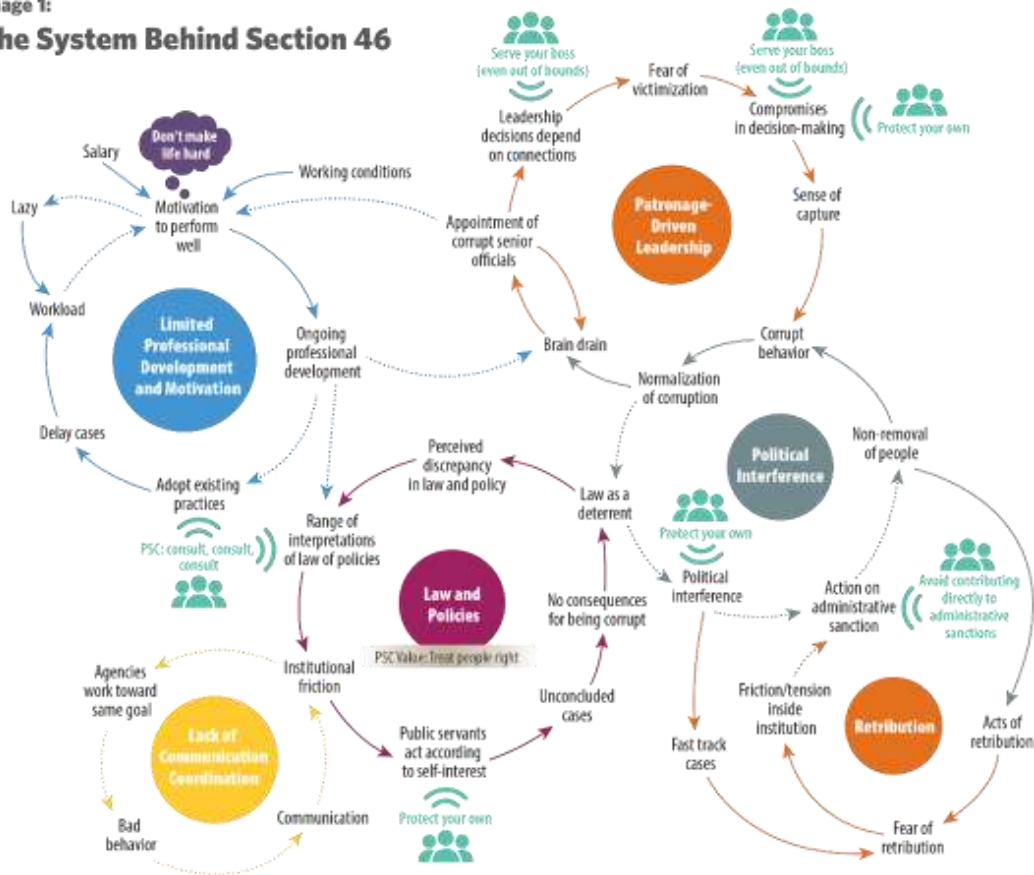
Recommendations: Options to consider moving forward

No one kind of program will induce consistent and authentic compliance with Section 46. The interaction of so many factors makes the system of non-implementation resilient to efforts to change it. This is why more direct technical interventions are unable to generate enduring behavior change, as they don't respond to some of the more important drivers in the system.

A series of possible entry points have been developed for consideration. We believe that effective programming will need to be multi-faceted, linking work on the legal and administrative factors with work on social norms.

1. Address institutional and structural factors that make implementing Section 46 difficult. This responds to differing interpretations of laws and policies, as well as tensions and lack of communication that hinder cooperation.

1.1. *Create an ongoing inter-institutional working group to harmonize and simplify processes and regulations.* Made up of senior and mid-level officials, we recommend that the group be 'led' by a skilled external facilitator with experience in dialogue, group dynamics, and conflict resolution. While the topics on the agenda of this working group will be technical, the primary purpose of this effort is to facilitate the development of robust cooperative relationships between civil servants in the different commissions. Improved relationships and joint problem solving among these officials will help diminish institutional friction, promote mutual understanding, and build communication channels and capacities for addressing problems jointly.

1.2 *Extend the effort to harmonize and clarify processes and regulation beyond cases involving officials convicted under Section 46.* We recommend expanding the effort to include pending or incomplete cases where an officer has been interdicted or under investigation, but not yet convicted or acquitted. While focusing on apparently easier cases of post-conviction sanctions has been a reasonable strategy for generating some quick successes, our analysis found that the issues are linked, and focusing only on completed cases could have unintended negative consequences, such as greater (and corrupt) efforts to prevent conviction.

1.3 *Align laws and regulations (Section 46) more with existing social norms.* Social norms research has suggested that laws can be a positive force in changing social norms by signaling that a practice is bad and encouraging social re-evaluation of it. However, if a law deviates too much from the social norm, research suggests that people will often ignore the law. And public discussion will also be foreclosed, undermining the possibility of norm change. There may be a window of opportunity following the 2021 election to develop ways to bring mechanisms for implementation of Section 46 closer to the values and social norms of those who are charged with implementing it, as well as the community at large. This would enhance the likelihood of consistent enforcement of Section 46 penalties.

1.4 *Invest in ongoing professional development for officers.* Professional development should not only include education on the content of the law, but also address how to make the law work, how to deal with challenges to implementation, and ethical and professional standards of conduct. It should also help reinforce the notion of a public servant's role as serving the public, not just their boss. It is critical that professional development not be undertaken as a stand-alone initiative; without connection to other efforts it is unlikely to succeed.

2. Address Social Norms. Together with institutional initiatives, efforts should be made to address the social norms that both exacerbate the institutional factors hindering Section 46 enforcement and motivate or drive civil servants' behavior. Without addressing the social norms, the institutional approaches are not likely to be sustainable.

2.1 *Weaken vertical pressures: Constrain the power of senior officials to use professional sanctions to enforce social norms.* This would help reduce the fears of retribution and harm of many public servants if they do not, for example, "serve their boss" or fail to follow the norm to "not contribute directly to an administrative sanction process". Reducing the ability of supervisors to impose professional sanctions on subordinates for non-compliance with illegal or unethical (often serving their personal interest) demands or expectations could open possibilities for individuals to deviate from the social norm of "serve your boss" when they are expected to do something that is not in accordance with the law. We recommend developing avenues for more junior level officials to report pressure from their superiors without fear of repercussions, together with a review mechanism for such cases when they arise.

2.2 *Change the norm of "avoid direct contribution to administrative sanction processes" by identifying and connecting "positive deviants".* Create a professional group of people who do not abide by this norm. There are several approaches, based on social norms research, that are relevant here: strengthening positive norms and values that contradict the direct norm to eschew direct, overt support to administrative punishment processes, and reinterpreting "indirect" norms, such as "do not cause trouble for one's colleagues" or "protecting one's own" to exclude illegal behavior.

3. Engage at the broad public service level in a parallel, yet strategically linked process.

Changing public expectations of appropriate behavior by identifying and publicizing positive role models can help to transform people who are positive deviants into "trendsetters" who might create the perception that it is possible to behave differently. While this is not directly addressing Section 46, creating a sense of momentum that not everyone behaves without integrity, and that the norms may be weakening, can help open space for officials involved with Section 46 implementation to behave differently.

3.1 *Consider support for "Integrity Idol"-type programming.* This is media programming that highlights positive role models, especially for youth. This would be a helpful compliment to programming within the concerned government institutions, though not directly targeting Section 46 implementation.

3.2 *Reinterpret meta-norms.* Explore whether key current meta-norms, such as reciprocity and kinship, could be reframed and reinterpreted to support, rather than undermine, integrity. Experience in Rwanda suggests that there are opportunities to initiate dialogue on the nature of fundamental meta-norms of reciprocity and supporting one's "own" to revive a more collective interpretation held traditionally that was grounded in pride in and accountability for the group's behavior and reputation.

4. Share the analysis and recommendations

In order to ensure transparency and confidence in the process, and to promote continued engagement with the effort to implement Section 46, it is important that the report be shared with those who participated in

the interviews and workshops, as well as with those who may be in a position to support implementation of the findings of the analysis (e.g., DFID, EU). In addition, we also recommend directly sharing the report with other stakeholders who may have directed their staff to participate in the analysis or who are managing the implementation of Section 46 (e.g., senior leaders in the public service, such as the Chairpersons of the Commissions and Accounting Officers). This would be most effectively done through a presentation, meeting, or other form of direct communication.

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Acronyms

AO	Accounting Officer
CLM	Causal Loop Mapping
ESC	Education Service Commission
IG	Inspectorate of Government
HSC	Health Service Commission
JSC	Justice Service Commission
ODPP	Office of the Directorate of Public Prosecution
MDA	Ministry, Department or Agency
MOPS	Ministry of Public Service
PSC	Public Service Commission
SG	Solicitor General
SUGAR	Strengthening Uganda's Anti-Corruption Response
TAF	Technical Advisory Facility

Acknowledgments

The authors would like to extend their appreciation to the SUGAR staff for their support and engagement throughout this project. It was a productive collaboration, made all the better by the staff positive attitude and skillful contributions.

A. Introduction

The Strengthening Uganda's Anti-Corruption Response (SUGAR) facility was stood up by the United Kingdom's Department for International Development (UK DFID) in 2014 to support increased central government accountability. One pillar within this mandate has been to ensure that corrupt public servants are administratively sanctioned once criminally convicted.

Since 2016, SUGAR's support has included the development of better processes and manuals for key functions in the disciplinary process, the convening of a case referral mechanism, the development of a closed case referral form, and contributing to the review of the Public Service Standing Orders. SUGAR has also engaged with the recently established State House Anti-Corruption Unit to enlist their support.

Despite significant effort by SUGAR, convicted public officers still remain on the payroll. SUGAR has identified several contributing factors: lack of clarity within the various institutions as to appropriate process; conflicting perspectives on the right approach; rejection of the legality of the closed case referral form; resistance to accepting SUGAR support on cases (i.e. PSC refuses access to cases); and, serious delays in actioning the process, including non-response. While these issues contribute to the problem, SUGAR recognizes that the situation is complex, and the existing technical responses alone are unlikely to succeed.

The Problem
According to SUGAR, at the end of 2018:
• 28 convicted officers were still on payroll
• 16 convicted officers were removed
• 4 convicted officers were still being paid their pension

In an effort to bolster their approach, in the early fall 2019, SUGAR initiated an inquiry into the underlying norms and values that define the resistance to removing corruption convicted officials from public service in accordance with Section 46 of the Anti-Corruption Act, 2009. This Act provides that a person who is convicted of an offence under the Act shall be disqualified from holding a public office for a period of ten years from his or her conviction.

B. The Inquiry

The inquiry was conducted by a three-person team (bios available in Appendix 1) with a combined expertise in corruption, social norms, systems mapping, design thinking, and Uganda history and socio-politics. Conducted over the course of 2.5 months, the inquiry had three objectives:

a) To understand the norms and behaviours in key government offices that manage the administrative sanctions regime in the Government of Uganda. Explore how these norms connect to the wider context and whether these norms and values explain the resistance to the implementation of sanctions against corruption.

b) To study the context and factors driving these norms and behaviours.

c) To develop recommendations for SUGAR on possible actions to influence social norms that stymie appropriate action around disciplinary procedures.

Only Convicted Cases
In alignment with SUGAR's work to date, this inquiry focused solely on those cases with corruption convictions.

1. Methodology

The team adhered to a set of working principles which centred around collaboration (see Appendix 2) and informed the methodology development and implementation. The three-phase process consisted of preparation, participatory engagement, and analysis. The methodology utilized:

- *Causal loop mapping* (CLM): based on systems thinking, CLM is a tool that develops visual representations of complex problems such as the implementation of administrative sanctions within the Ugandan civil service. Causal loop mapping helps us understand how the system functions so that we can think strategically about how we might shift the system.

- *Participatory engagement*: generates information through facilitated discussion and was feasible given the resource constraints.

The team first conducted a participatory engagement to identify key factors in the system that creates inconsistent application of Section 46 with 22 participants from JSC, PSC, ODPP, IG, and MOPS. Having multiple representatives from each agency was an important aspect of the process because it ensured representation of a broad perspective. While one can still not generalize from this basis, the scale of participation does contribute to triangulation of the findings.

The team, with SUGAR's support, took this initial information and generated a tentative analysis in the form of a causal loop map. This was reviewed by 12 participants from JSC, ODPP, and IG at the second full-day meeting, when we also did a deep dive into social norms. Unfortunately, PSC was not available to participate in the second day, instead opting for a one-hour group interview.

The mapping was a critical first step, as behaviours are driven by many different factors, social norms and values amongst them. Understanding how the various factors in the system relate to each other, identifying critical behaviours, and how they are influenced by norms and values is therefore key to developing contextually grounded recommendations.

2. Key Limitations

The map should be understood as **suggestive of the system and not a concrete depiction of the final system** that creates inconsistent application of Section 46. There are several reasons for this caution. First, the PSC participants left the first day meeting in the early afternoon, which removed their perspective from the discussion and meant that one of the key themes identified in the morning – bureaucracy – was not analysed. Furthermore, PSC did not have an opportunity to validate the draft causal loop map, once again removing their perspective from the final product. Finally, more time on the ground with knowledgeable people would have been informative. The map would have been further synthesized to depict a 'core story' that shows what is at the heart of the system, which offers more clarity on potential interventions.

C. The System Behind Administrative Sanctions: A Causal Loop Map

In order to improve the consistent application of administrative sanction embodied in Section 46 of the Anti-Corruption Act, it is important to explore what is driving and enabling the current situation. The team used causal loop mapping to develop an initial representation of how the various factors in the commissions and government offices interact to help or hinder application of sanctions.

Causal loop mapping is a tool that develops visual representations of *complex problems* like the implementation of Section 46 within the Ugandan civil service. It helps us understand how the system functions so that we can think strategically about how to shift the system.

There are many different factors found in a system; social norms are just one type. By starting with a causal loop map, we are able to identify if and where social norms play a role in perpetuating collective behaviours and if that role is significant when compared to other factors in the system.

As shown in Image 1: The System Behind Section 46, the factors that affect application of administrative sanctions reach far beyond the mere technical administration of the laws and policies and include patronage-driven leadership, political interference, as well as public servant development and motivation, and inter-agency communication. Victimization and retribution then act as a vicious cycle that reinforces the entire system. In effect, the map answers the question: *Why do public servants convicted of corruption remain employed when Section 46 of the Anti-Corruption Act provides for dismissal?*

The System is Representative of Convicted Cases

In the course of the inquiry, it became clear that those cases with convictions were not the most challenging for those responsible for application of Section 46. In fact, those cases where there was an acquittal or insufficient evidence for the government to proceed are more difficult as the process is less clear and thus more subject to interference.

We believe that the system as currently represented also applies to these cases but may not be comprehensive to that experience.

Each loop of the map is examined below, starting in the middle with Laws and Policies. Each factor in the loop and its relationship to the next factor is described and examples are provided. Brief mention is made of the role of specific social norms and values in driving behaviours, with detailed explanations offered in Section C.

While the specifics are broken out to make the complexities more accessible, to understand how the system functions, one must keep the complete map in mind. Finally, it is worth reiterating that the map is only an initial representation due to the limitations of the process.

The development of a map is not a truth-seeking process. There is no one perfect representation of the system that is being sought. Instead, the expectation is to develop a reasonable representation of the system that is accepted across a diverse group of people. When done well, CLM offers a number of benefits in comparison to traditional problem analysis forms, such as problem trees.

1. CLM can generate a holistic understanding of a shared problem among a diversity of actors.
2. CLM enables identification of atypical points of intervention, which breaks actors out of the usual modes of programming.
3. CLM allows for testing of the plausibility of theories of change for effectiveness and potential to do harm.
4. CLM sets up strategic program coordination between actors.

Image 1:
The System Behind Section 46
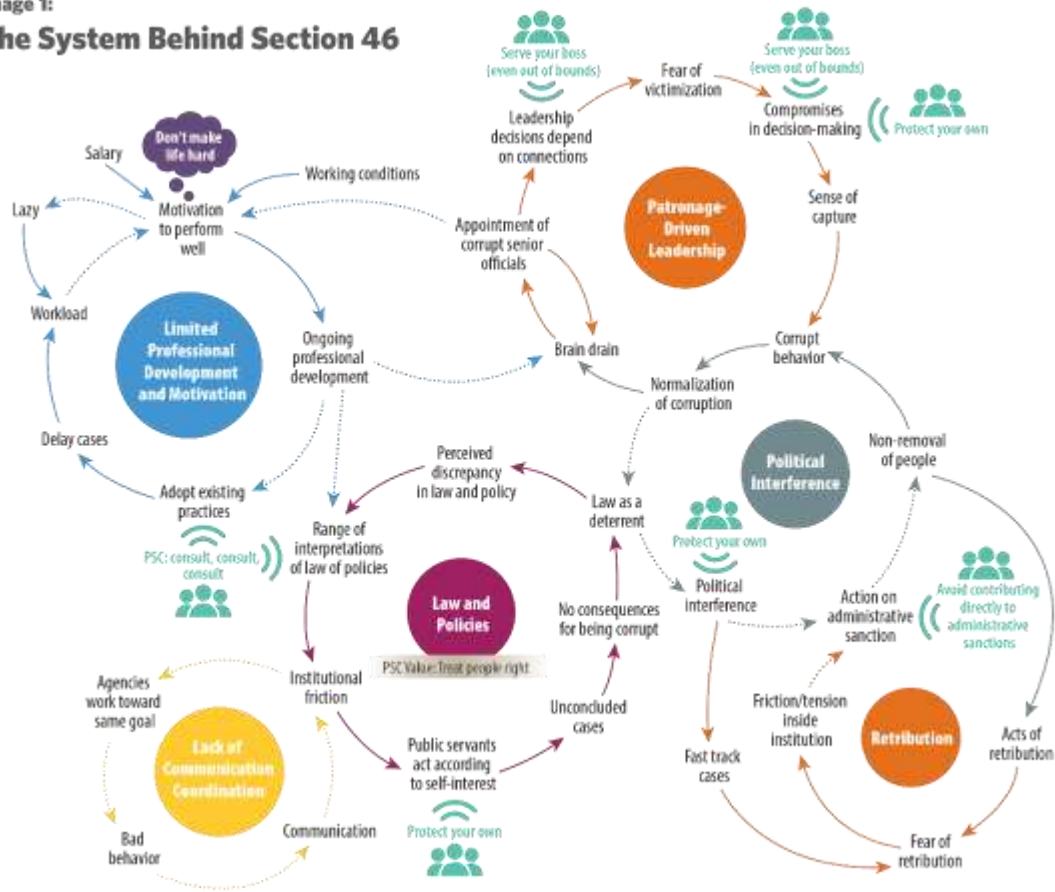
How to Read a Causal Loop Map

Causal loop maps provide a visual representation of the dynamic relationships among elements of a system and make explicit an analysis of the underlying structure that give rise to the patterns of behavior. The map consists of:

- *Variables:* factors which include structures, actions, perceptions, feelings, mental models (ways of framing or thinking about issues) and social norms that may determine behaviors
- *Causal links:* depicted as arrows, these show the relationship and direction of influence between variables. These can be in the same direction (continuous arrow) which means as one goes up (or down), the other factor goes in the same direction. Or, they can be opposing (dotted arrow) meaning that they move in opposite directions which means as one goes up the other goes down.

········· Inverse relationship

─────── Direct relationship

Mental model

Social norm

1. Law and policies

There is a perception within the PSC that the law and policies related to Section 46 are not harmonized. In particular, Article 42 of the Constitution, which accords people appearing before an administrative official or body the right to be treated justly and fairly, and the related Solicitor General opinions are perceived to be inconsistent with Section 46. This **perceived disharmony** is informed by a belief that Section 46 is an "unfair law" because it creates "administrative duplication" through the creation of two processes: the court and the internal PSC process. The PSC firmly believes that "the channel in which [a public servant] came in must be the same channel through which they exit". Thus, PSC officers feel they cannot directly implement Section 46, regardless of the criminal conviction, without going through their own process as well to assure a "fair hearing". This apparent distrust of the court ruling is not entirely unjustified. There is significant research, our own included,[1] that documents the extent of corruption in court proceedings. The additional process conducted by PSC is lengthy, which is burdensome for the individual under scrutiny.

Conversely, participants from ODPP, JSC, and IG strongly asserted that the law is clear: a convicted person "shall leave public office". It was argued that insistence on a second hearing makes the PSC a de facto appellate court, which it does not have the standing to be. Given the strong legal consensus that the law is in fact clear, the disharmony is in fact a PSC perception, yet this perception informs the PSC reality.

What was not possible to ascertain was the basis of the perception that the laws are not aligned. Is it that PSC staff actually believe that the law and polices are not consistent? Or, is this simply being used as a convenient excuse to deflect pressure and proceed as they wish?

As the perception of disharmony in the Section 46 law and policies increases, the *range of interpretations of the appropriate course of action* broadens. The starkest example of this is seen in the far broader set of factors considered in internal PSC investigations, compared to what is considered 'evidence' in a court. Years of service, proximity to retirement, prior commendations or awards for performance, scale of the offense, and extenuating circumstances of the particular case itself are all taken into account in the PSC internal process.

There are many reasons why the PSC takes on a broader perspective, one of which comes from the belief that the law is unfair, as mentioned earlier. In this sense, the law is viewed as unfair because it demands the same consequences for all corruption convictions regardless of the magnitude or severity. A conviction for the diversion of one million shillings, for example, receives the same consequence as one hundred million shillings.

Cases Without Convictions

According to PSC, determining the appropriate way forward in cases in which the person is acquitted, interdicted and still under investigation, or where the government decides not to proceed with the case is more unclear. They assert there is confusion around the appropriate means of handling these cases and different offices are alleged to have different approaches and standards.

According to the PSC, these different approaches result in delay and losses to the institution, as the affected officer can neither be replaced nor continue to work. The government continues to pay the officer a half salary but is not able to replace the position. And in case the interdicted officer succeeds in overturning the interdiction, the government loses a significant amount of money in compensation.

The team was not able to gather information from other Commissions to triangulate these asserts.

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[1] Scharbatke-Church, Cheyanne and Diana Chigas, "Facilitation in the Criminal Justice System," The Fletcher School of Law and Diplomacy, 2016. https://sites.tufts.edu/ihs/files/2018/02/Facilitation-in-the-Criminal-Justice-System.pdf

The PSC offered a clear example of how they view cases in a broader light. They explained the case of a young engineer public servant who was convicted of diversion of resources for drilling a borehole in a different village than originally instructed. In the PSC investigation, they determined that there was no theft of money and that the engineer was simply following instructions that had been approved by the engineer's Accounting Officer after receiving the request from a local Councillor. The PSC Human Resources Officer felt these circumstances were compelling and included them in the recommendation letter for the Board's consideration.

The PSC Human Resources Officers also consider a wider range of consequences in their recommendations to their Board. Unlike JSC, where a convicted public servant receives immediate dismissal upon the receipt of the court ruling, and is not granted a separate process, PSC consider other options. The most common alternative appears to be "early retirement in public interest," where the convicted individual is forced to retire against their wishes but remains able to draw a pension. PSC argues this is the humane thing to do, particularly when they perceive the severity of the offense to be inconsequential such as stealing a million Shillings. While "retirement in public interest" allows the affected individuals to draw their pension and benefits, they cannot serve on any public board or commission. PSC's perspective is that retirement in public interest is disgraceful, with huge social costs and consequences.

Perceived discrepancy in law and policy

Law as a deterrent

PSC: consult, consult, consult

Range of interpretations of law of policies

Protect your own

Law and Policies

Political interference

No consequences for being corrupt

PSC Value: Treat people right

Institutional friction

Unconcluded cases

Public servants act according to self-interest

Protect your own
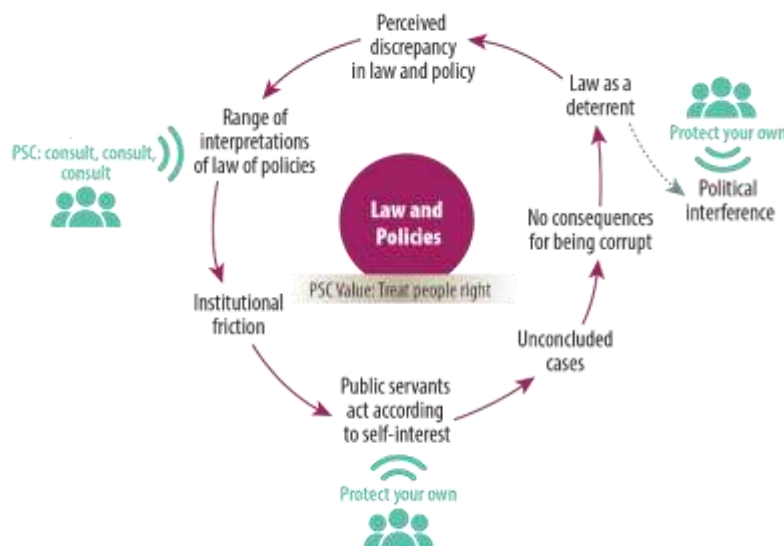
The varying interpretations of the law and policies do not lie solely with the PSC. This is an issue experienced to different degrees across the institutions responsible for implementing Section 46. For instance, the IG insists that the appropriate way to communicate a conviction is through a letter from their office and does not use the jointly created case referral form as they do not believe it has legal status. ODPP, on the other hand, has accepted the case referral form as an appropriate mode of communication.

The varying interpretations result in courses of action that are not what is expected by the other institutions (i.e. IG, JSC, PSC, ODPP) involved in the administrative sanction process. The *institutional friction* that this creates diminishes the ability of the different institutions to work well together – a requirement for the anti-corruption sanction process to be implemented effectively. In a nutshell, disjointed action creates institutional friction, diminishing coordination, which reduces effective sanctioning. This friction does not exist solely between PSC and the more legally oriented institutions. It is found between all of the agencies. For instance, ODPP asserts that when they go to the IG for help on a case, help is not only withheld, but the interaction can be "aggressive and hostile".

With the institutions not cooperating, the collective action necessary to effectively implement sanctions is difficult to accomplish. There is more room for *public servants to act according to self-interest* due to the gaps in the process and fewer eyes on the file. Self-interest is typically exhibited as *protectionism*: actions taken to protect a public servant who has been convicted of corruption and with whom the individual has a personal relationship (e.g., they know each other from school, church, or the same tribe, etc.). Though a less frequent

phenomenon, public servants also can act according to self-interest by *victimizing* someone using the official processes. Victimizing implies the use of the sanction process to unfairly punish or attack another public servant, regardless of the facts of the situation. For instance, PSC mentioned that some Accounting Officers use the disciplinary measure of interdiction to fight personal battles against officers they do not like. In such cases, an AO will use their powers and office to delay the interdiction to the detriment of the affected officer, who is unable to be cleared of the case and get reinstated to his or her job. Further entrenching self-interested behaviour by public servants is the indirect social norm: "protect your own" (see pg. 16 for a detailed description).

The number of concluded cases is directly related to the degree to which individual public servants act according to self-interest. Protectionism – the dominant behaviour - increases the **number of unconcluded cases** (i.e., convicted public servants not being terminated or removed from payroll), as the file is purposefully not moved forward. In cases where self-interest demands victimization, the number of unconcluded cases decreases. These rare cases, which are pushed aggressively through the process. In many instances, these are not 'success' stories for the anti-corruption process. As the term victimization suggests, this is using the anticorruption laws and procedures to unjustly attack someone, not to appropriately implement Section 46.

With convicted criminals in their midst (i.e., those who are awaiting their internal PSC process to proceed) or receiving half pay on interdiction, public servants observe that there are **no consequences for being corrupt**. As this perception strengthens, the belief in the **law as a deterrent** diminishes.

All of the factors described in this loop are influenced, in the case of PSC, by one of their strongly held values: "treat people right". Described in full on pg. 21, this value injects notions of humanity and courtesy into how they approach the law and relevant policies.

2. Limited professional development and motivation

The range of interpretations of law and policy is exacerbated by a vicious cycle of limited professional development and motivation within the public service. Specifically, inadequate **professional development** means that it is difficult for public servants to keep current with legal and procedural changes. Without sufficient training, public servants look to **existing practices** within their institutions as guideposts for correct action. These practices may be based on formally agreed (i.e., written) procedures, but are equally as likely to be processes that informally developed over time regardless of the written instruction. Within the PSC, a norm of consultation has developed, whereby extensive engagement is expected before recommendation letters can be drafted (see pg. 19). This emphasis on the way things are done maintains institutional habits and acts as a barrier to change. Given that existing practices may be out of sync with current laws and policies, cases end up being delayed as steps are taken that are not necessary or in line with the current law or policy.

As the volume of delayed cases increases, so too does the workload for those public servants. A workload that is already difficult to
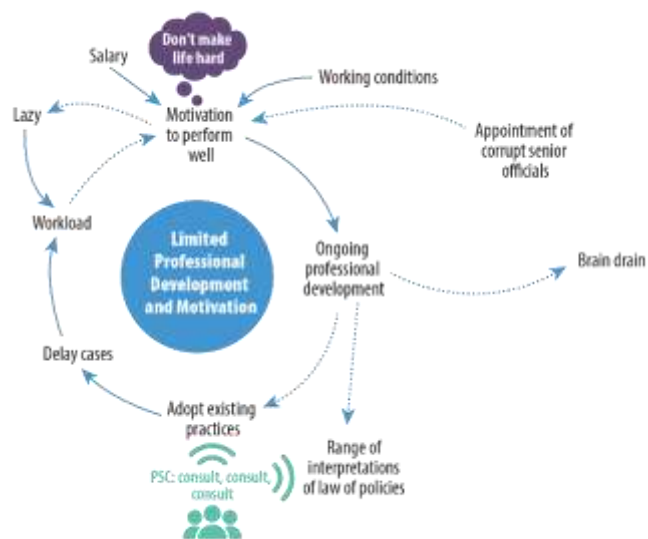
shift, given the general attitude of **"laziness"** that was asserted to exist within the public service. With increased workload comes a decreased **motivation to perform well.** Low salaries and poor working conditions in the public service further contribute to a motivation deficit. Low motivation, in turn, exacerbates the sense of laziness in a mini-vicious cycle. Those who are not motivated to perform well are also unlikely to seek out ongoing professional development and therefore rely on internal recommendations as to the 'right' way to proceed (i.e., existing practices)

This cycle, particularly the motivation, lazy, professional development portion, is heavily influenced by the mental model within the public service: "don't make life hard". A mental model is an implicit filter that individuals use to make sense of their world. Public servants are conditioned to approach situations from the perspective of making it easy and simple (i.e., "no stress"). This mindset is exemplified by the expression, "Who wants to burn their own hands?".

Putting it all together, this cycle collectively results in poor quality public service performance in general. When looking specifically at administrative sanctions, this vicious cycle of low motivation fuels the varying interpretations of law and policies because current, accurate interpretations require effort, education, and bucking existing practices.

Mental Model
Everyone uses mental models. They are implicit mental schema that help us make sense of the world. Information is taken in and understood or filtered through a mental model to create meaning.

3. Lack of communication and coordination

Institutional friction diminishes **agencies' ability to work towards a common goal.** In an environment wrought with tension, public servants adhere to official mandates and procedures in a literal fashion. As these procedures do not explicitly instruct them to communicate or follow up on a case with each other, they do not do so, and justify this as not in their mandate. This literal interpretation ignores the fact that they have a common goal.

There were many references to institutions asserting 'institutional independence,' as people explained how things currently operate. An actor from one institution cannot ask for information or help from another, for instance, without receiving an assertive declaration of the recipient's independence and refusal to assist. The ODPP explained, for instance, that their mandate is to prosecute, not to communicate the conviction of an officer to other institutions. There is also a sense of competition between the IG and ODPP, with the ODPP believing the IG is duplicating their work, while being better facilitated (i.e. resourced).

As agencies disagree and jostle for position, rather than work towards a common goal, the amount of **"bad behaviour"** such as suspicion, "outright hostility," and distrust increases. With negative sentiments dominating the environment, **communication channels break down,** resulting in little to no information flow between institutions. This delays, or even stops, the administrative sanction process from functioning as the case does not proceed to the next step, while offering even more opportunity for gaps in the process to be exploited. Without

Agencies work toward same goal

Institutional friction

Lack of Communication Coordination

Bad behavior

Communication

adequate communication, the institutional friction between the key anti-corruption institutions in the Uganda government is exacerbated.

4. Political interference

Section 46 is regularly undermined by a cycle of ***political interference,*** which is partially driven by the social norm to "protect your own" (further explained on pg. 16). Officials, politicians, and/or 'godparents' intervene to delay or stop appropriate ***administrative action*** from being taken. Sometimes the intervention is done


through informal means, such as a call to a friend who can exert influence to delay a process, but sometimes the interference is couched in the official process. For instance, Board Commissioners are directly appointed by the President and are the ones who make the final decisions on cases. This makes them highly susceptible to political pressure and influence from the highest levels of the government.

Inaction on administrative sanction is also influenced by the direct social norm which dictates that public servants should avoid contributing directly to any form of administrative sanction. As no action is taken, individuals who have been accused and even convicted are ***not removed*** from the public

service. Without their removal, ***corrupt behaviour*** continues and, many asserted, increases, as the accused/convicted official develops a sense of being untouchable. This in turn ***normalizes corrupt practices,*** which ***undermines the law as a deterrent.*** Without the pressure of potential punishment through the law, there is even more room for ***political interference*** (a form of corrupt behaviour in itself).

The consequence of political interference is typically inaction on cases, but not always. In fact, while not as common, political interference can "***fast track" cases*** through the system. If one is seen to be an opposition supporter, politicians will use the anti-corruption mechanisms as a means to target and remove their opponents. These actions typically align to the vertical hierarchy of the institution. The potential for a fast track approach is widely known within these institutions and feeds a ***fear of retribution*** if a public servant takes appropriate (as per the law) action against a well-connected individual.

In cases where political interference leads to ***inaction on administrative sanction,*** convicted individuals remain within the institution, setting
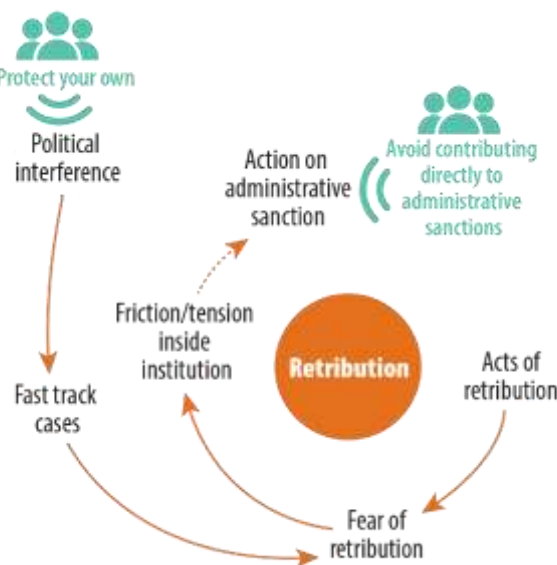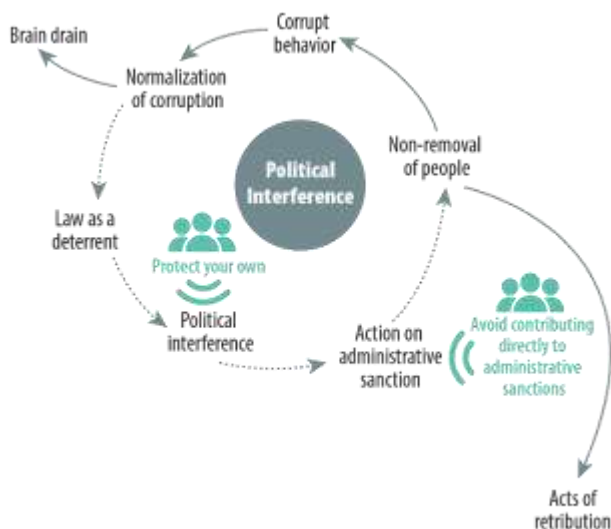
the stage for ***acts of retribution*** against those colleagues who aided in the implementation of the sanction. For instance, if a civil servant has been a witness in the case of an accused colleague who is then not removed from the workplace, they have to continue to serve with each other after the trial. The public servants involved in this analysis asserted that it is just a matter of time before the individual who was not removed (and their network) will "make a move against you. They will wait for you to make one mistake and then take action; frame you and try to fast track you out of the system." Unlike the fast tracking used in political interference, this typically occurs in a horizontal manner between peers.

In both circumstances – inaction leading to non-removal and "fast tracking" cases – the ***fear of retribution*** is a powerful motivator for people to act with caution. As one public servant explained, "Staff don't want to speak out against other staff, because what happens to you in the future? People don't want to be responsible or blamed for other people's problems or getting them in trouble, even if the person has been convicted of doing something wrong. If a public servant did anything that was perceived to have victimised a colleague, when that public servant gets in a bind, no one will stand up for them."

This environment of fear and retribution creates significant ***internal tension and friction*** within an office. Encouraging public servants to keep their head down and not do anything that could shine the light upon them. The tension harms work processes and effectiveness diminishing even further any action on administrative sanction.

5. Patronage-driven leadership

When it comes to leadership, corruption needs to be understood in the broadest sense of the term – it is not simply about illicit funds, but rather the normalization of a patronage system whereby loyalty is the only rule.

When corrupt behaviours become the regular way of operating, they become ***normalized*** throughout the institutions. An example illustrates this nicely: an older man who had recently joined the public service was given money to go to the field. He didn't use all of the funds in the course of his work so returned the excess. His peers and superiors ridiculed him, telling him to not do it again because it would set the precedent that one must return unused fieldwork funds. The next time he was sent to the field, he returned with a zero balance.

The resulting normalization of corruption creates an untenable work environment for some. As corrupt acts

increasingly become the dominant practice, these people feel compelled to leave, thus contributing to ***brain drain.*** This exodus can involve leaving the public sector entirely, but it also sees people making strategic choices to protect themselves from undue pressure. As one individual explained, "You move to sleep comfortably, you have to think of your family." Several examples were given of competent individuals changing departments, despite incurring significant salary cuts, in order to have a role that did not place them in positions where they were susceptible to direct political interference and pressure. For instance, the story was told of a man who left a job of 10 million
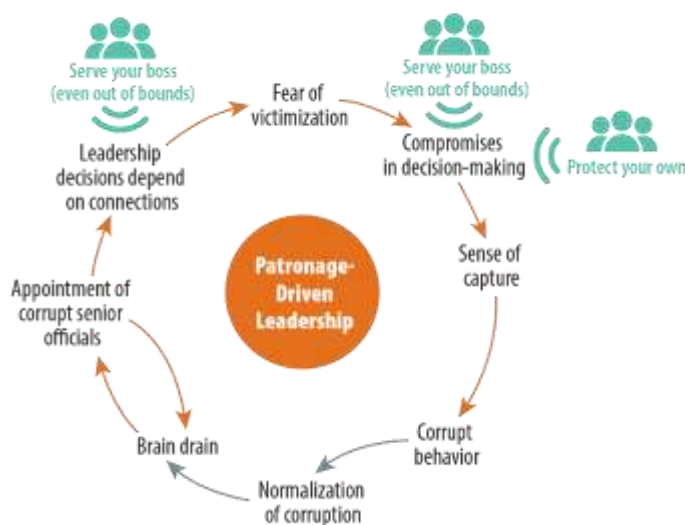
shillings in order to take a job for 2 million in the JSC to get "off the hook." There is a notable caveat to this. Not all of these moves are due to integrity challenges, as some lower paying jobs offer more opportunity for illicit financial gains.

With professionals opting out – out of public service or out of consideration for promotion – the pool of candidates to select from to **appoint to senior positions** becomes dominated by those who participate in the patronage system, and by extension, corrupt behaviours. As one individual noted, the public servant pool is full of "bootlickers" – individuals who are there to serve the regime. Another group explained that the people who go to the top are those who understand how the system works as it is – not as it should be. These patronage appointees encourage the brain drain below them by professionally side-lining those who have not left but refuse to participate in 'off-side' processes. Those who attempt to act with integrity or according to their values find themselves excluded – not invited to meetings, information withheld – from the basic processes needed to fulfil their role, as well as ignored for promotion.

As appointments of corrupt senior officials increase, so do the number of **leadership decisions based on connections** instead of laws, policies, values, or role-based competency. The expectation is that the appointee will 'serve' the person who facilitated the promotion and 'make them happy'. Serve your boss (even out of bounds) is a clear social norm in this environment (see pg. 17). The web of invisible connections that surround leadership contributes to the **fear of victimization** experienced by public servants. Knowing that the connections exist, but not knowing what they are exactly, leads to **compromised decision-making.** Further exacerbated by the norm to "serve your boss (even out of bounds)" along with "protect your own'. These compromises are sometimes demanded – the individual receives a call or instruction – and sometimes inferred, whereby the public servant assesses the landscape and makes calculated choices to avoid consequences.

These compromises are required if a person is to rise in public service, and over time, as a person progresses in their career, lead to a **sense of capture**. Individuals have no choice but to align with their patrons. There is no space for independent decision-making. This partially explains how difficult it is to find reformers who have risen up within the system. As leadership is increasingly captured, the amount of corrupt behaviour increases because there is no option to assert the rules and say, "I need to do my role". Patrons will respond, "And who gave you this power?" As corrupt practices increase, a sense of normalization of corruption within the public sector flourishes.

There is also a connection between the leadership dynamics and public service motivation. Appointment of corrupt senior officials is demoralizing for many, diminishing their **motivation to perform** well. Without motivation, there is limited effort for ongoing **professional development** by the individual public servant and very little incentive to offer professional development by leadership. This adds fuel to the **brain drain,** as there are few opportunities for growth through good performance (defined as professionally applying the law.)

D. Social Norms and Values

This study inquired into social norms and values to explore their influence on behaviors pertinent to the application of Section 46. There are many factors an individual considers, implicitly and explicitly, when making choices about how to act: the law, feelings of self-efficacy, aspirations, economic options, values, as well as what people they care about expect from them. The last in the list are known as social norms and are **the mutual expectations within a group about the right way to behave**. They represent what a group of people accept as appropriate and typical behaviour and are enforced – to varying degrees – by the group itself.

Social norms matter because they are a significant influence on behaviour. In fact, studies show that social norms can be more influential on decisions than individual attitudes or even values. Research in other fields (e.g., public health and gender) suggest that social norms can be the brake on sustainable behaviour change. In other words, even if one could change the technical factors that are undermining application of Section 46, such as the different interpretations of the law, without norm change, sustainable shifts are out of reach.

Enforcement of social norms is carried out through sanctions – both positive and negative. Those who comply with the group's expectations receive subtle, positive reinforcements (e.g., smiles, nods, approval), and those who do not behave in the manner expected are negatively sanctioned, typically through social means (e.g., rumours, cold shoulder). However, sanctions are not always only 'social' in nature. Where members of the group also possess official power (e.g., a supervisor), they may give professional rewards (e.g., training opportunities or promotion) and consequences (e.g., demotion, being side-lined or transferred) as well. In these environments, social norms may be more appropriately labelled "professional" norms – the mutual expectations within a workplace about the right way to behave.

Social norms come in two forms – direct and indirect. The distinction is important, as it impacts how one might support a norm change.

What's the Difference?

Social norms drive **behaviors** but are not the behavior itself. Similarly, it is important to remember that a social norm and an attitude may align, but the constructs themselves are not the same.

Individual attitudes are personally held beliefs or judgements while norms are expectations about the appropriate way to behave.

- *Direct social norms dictate a specific behavior*. For direct norms, the mutual expectations require a specific action. For instance, doctors are expected by other doctors to demand a fee for service.

- *Indirect social norms can manifest in a variety of actions*. For indirect norms, the norm acts more like a principle and there are numerous behaviors deemed appropriate to fulfill the expectations. For instance, the expectation that members of a militia should be loyal to each other could result in a range of behaviors, such as physical protection or refusal to provide information on the person to the authorities.

Finally, not all social norms have the same strength when it comes to influencing behavior. Norms range in strength from very strong, where they are practically obligatory, to quite weak, where they exist but people experience them as optional (i.e., they can and do deviate without fear of sanction). The elements that make up norm strength include:

- the importance to the group of the action,
- detectability of the act,
- likelihood of a sanction and the consequences of that sanction, and
- degree of group cohesion.

Conclusions about norm strength were made when sufficient information was available. This assessment is important information to have when considering how to respond.

The norms and values described below were predominately drawn from a day long discussion with members of the JSC, IG, and ODPP. As norms exist within groups of people, they should be viewed as applicable to only these agencies. It is not appropriate to automatically extend their application to the PSC.

1. What social norms influence public servants' behavior in relation to Section 46?

1.1 Protect your own

In the limited exposure that the team had to PSC officials, there were hints of unique norms and values. We did not have sufficient time with PSC officials to determine with certainty whether and how this is the case; thus, the references to norms for the PSC especially should be understood as hypotheses based on limited information.

In the context of administrative sanctions, ***public servants in the JSC, ODPP, and IG are expected by their "own" to act in a way that protects their own.*** In this case, their "own" refers to their extended network, typically consisting of families, friends, community members, clan, etc. These are horizontal connections, meaning the group transcends the government walls; the relationships are based on personal, not professional connection. As an indirect social norm, it manifests in a number of different behaviors that undermine the application of administrative sanction. Critically, this norm drives the behavior identified in the Law and Policy loop as *individuals act according to self-interest.* It also plays a role in the Leadership loop where the expectation to protect your own will be a factor in *compromised decision-making.*

The norm of protection demands that public servants should do whatever they can when their "own" people are faced with trouble. This could mean using their official position to protect one's own by minimizing the punishment, slowing the process, or trying to get it blocked where possible. Or it could also take the form of punishment or victimizing those responsible for causing trouble to their own in reprisal. It could also include taking advantage of any given opportunity to unfairly treat or dismiss the affected officer for minor errors, unexplained transfers or demotion, or denying opportunities for promotion, travel abroad or work on good paying projects.

Government officials in the ODPP, JSC, and IG shared examples of incidents where officials responsible for administrative sanctions face pressure because of the expectation to protect one's own. In one case, a Minister reportedly called an Accounting Officer to tell him to stop mistreating his brother in-law, who was subject to disciplinary measures due to a corruption incident. In another case, a supervisor was accosted after a church service in his home village by the mother of a woman from the same village who was subject to disciplinary measures due to corruption. The mother told the supervisor in no uncertain terms to leave her daughter alone. Neither case was resolved conclusively, and the implicated officials were reinstated in their positions.

In the vast majority of cases, failure to protect your own will lead to the group imposing a negative sanction. The individual's reputation will be harmed, as they will be regarded as "useless" or "good for nothing," and at the same time, the group will ostracize and alienate the individual. Officials with whom we discussed social norms felt that the cost of not protecting your own is severe. A person suffers socially and emotionally because families and larger social networks play an important role as fall backs, especially in times of difficulty. Being cut out from social networks means people's support systems, used in times of need and in major social events such as marriages or death, are severed. Officials gave two examples: grandmothers who decline to provide care to their grandchildren born to the respective officer who did not protect a relative by using their official position; and, colleagues not condoling with officials who lost a loved one.[2] Officials who object to protecting their own could be left to their own fate, with the assumption that their work, viewed as more important to them, can fill the gap their family, friends, clan, or community members could have covered.

While we have reason to believe that the norm of "protect one's own" is widely followed among the population in Uganda, and is aligned with values of support for one's family and friends, it is important to consider how it

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[2]It should be noted that this example was not related to administrative sanction only.

manifests (i.e., what is the behavior it is creating) and what group is expecting this behavior in the specific situation. For instance, if it is a friend from school who is in need of protection, the people who will expect the public servant to help are the group of friends from school. The group(s) that expect and may enforce the norm cross professional-personal boundaries. It may consist of people who have familial connections with the official (e.g., an uncle), or a tight social connection (e.g., village member, member of church community, classmate from school).

These smaller groups (e.g., university friends, family, village community) will tend to have a higher degree of cohesion, meaning the relationships will be quite tight and there will be a group identity that will very much matter to the individual. This makes the impact of the sanction more powerful – people do not want to be removed from groups that matter a lot to them. It also becomes significant when thinking about strategies for change, which we address in the next section.

Overall "protect your own" appears to be a very strong norm, made stronger as it aligns to the widely held value of helping one's own. In fact, some officials, especially men, were said to make up for their inability to protect their own by providing for other family, clan, or community needs in other ways, such as making huge contributions in church construction projects. These forms of support compensate for the lack of adherence to common expectations and rectify the negative impact on social image and belonging.

1.2 Serve your boss (even out of bounds)

Subordinates, particularly those appointed due to patronage, are expected by their superior(s) to follow instructions, even when they are contrary to the official rules. Noncompliance with this norm will result in strong professional consequences imposed by the superior, their superior's superior, or any of their connections. The group for this norm should be viewed vertically, as almost all superiors have a superior, and it is in their interest that this norm be maintained. Following a superior's instruction is an indirect social norm (also called a professional norm) found in many bureaucracies all over the world. The difference in this instance is that the expectation of obedience exists irrespective of formal rules or law, thus routinely requiring the subordinate to operate "out of bounds".

This norm drives two behaviors in the Leadership loop, as *leadership decisions depend on connections,* instead of official procedures and requirements. It also drives *compromises in decision-making*, as decisions are based on what is in the best interest of one's superior, and not the public good nor the rules. The decision to serve one's boss is also based on the potential negative sanction for noncompliance with the norm – namely, the potential victimization they could suffer for going against their seniors, supervisors, or the appointing authority.

Specific to administrative sanction, we learned that when junior officers handle cases involving a close relative of their seniors, they are expected to recommend a lighter consequence or sentence. The expectation is sometimes conveyed by the superior through the provision of a "non-rational explanation" to the junior officer to influence the decision in their favour – even

What are Social Norms?

Social norms are mutual expectations within a group about the right way to behave. These expectations represent what a group of people accept as appropriate and typical behavior. The expectations are generated based on two beliefs:

1. What we see or believe other people in our group do

2. What we think others in the group expect us to do

These expectations are held in place through sanctions (positive and negative) enacted by the group.

though the decision could be 'out of bounds'. Juniors also face immense pressure in the form of phone calls to act according to their senior's or superior's interest. The expectation to serve one's superior (even out of bounds) creates circumstances that can distort junior officials' choices and encourage corrupt behavior, as well as sow distrust among civil servants.

Junior officials can be punished for not obeying "out of bounds" instructions but will also be rewarded for demonstrating their loyalty and obedience, through mechanisms such as career advancement, travel abroad opportunities, assignments to well-paying projects, among others. A junior official who curries favor with the superior through obedience may then anticipate benefit from wrongly accusing people or reporting people to protect their boss (but also to further their own interests). These people were pejoratively called 'bootlickers' in our meetings.

The motivation to serve one's superiors or appointed authority (i.e., someone with political backing) is the need to maintain one's job, at the expense of official procedures or rules. The cost of going against a superior is high. It can create tension or friction between the junior and the senior and is seen as insubordination, which has heavy consequences, including: non-renewal of contracts, refused or delayed promotions, poor appraisals, forced exit from the institution or department, or not assigned to well-paying projects, among others. Sometimes, junior officers are subjected to hard conditions, popularly known as 'Katebe', a situation when an officer is left without deployment or given no assignment as a form of punishment for not following the expectations of their seniors.

The group who enacts the sanction – positive and negative – is vertically situated within the government. Our sense is that the group boundary follows the hierarchy (i.e., a boss's boss and their boss, etc.) but also includes those who are higher on the hierarchy but indirectly connected to the subordinate. This may even include an indirect report, because of the nature of connections and political appointments.

This norm was clearly present among the legal officers, who explained that the hierarchical structure in public services, and especially in the legal fraternity, further complicates the situation for junior officers. But the leadership style of the senior officer – (authoritative, considerate, or interactive) was said to greatly influence the experiences of juniors and the consequences they faced for taking certain decisions or actions.

Overall, this indirect norm appears to be very strong. The required action is highly detectable, and the sanctions are both likely and significant, while the formal hierarchy reinforces the group cohesion, as it is somewhat enforced.

1.3 Avoid contributing directly to administrative sanctions proceedings

In the application of administrative sanctions, officials, namely Human Resource Officers within PSC or others responsible for administering administrative sanctions in civil service, ***are expected by their peers to find avenues within official procedures to help colleagues avoid punishment***. This is a direct norm dictating the behaviour.

The expectation is to assist colleagues *indirectly* through tweaking procedures in favor of the affected colleague or declining or

The Consequences of Alignment

When social norms align with other group or individual sentiments like values or the prevailing attitudes of a group, they become even more difficult to shift. Conversely if individual attitudes differ from a social norm, it suggests an opportunity for change.

Similarly, direct and indirect norms are often connected; many direct norms are buttressed by indirect norms, making behavior change that much more difficult.

avoiding calls to provide witness in corruption allegations against colleagues. Direct obstruction or active transgression of official procedures is not demanded.

The sanctions for going against a colleague include possible revenge or retribution from the accused once he or she is cleared of the case and reinstated to his or her role. This norm contributes directly to the "Victimization" loop, as it is the course of the *acts of retribution* (which are the sanction for noncompliance with the norm, i.e., direct actions or positive contribution to removal of people), and underlies the *fear of retribution* that is a powerful driver of inaction on administrative sanction within government institutions, making it very hard to remove corrupt officials from public service.

Within the context of Section 46, the norm of avoiding direct contribution to administrative sanctions proceedings is a manifestation of a broader, indirect norm: ***do not cause trouble for colleagues***. This means both avoiding getting colleagues into trouble (e.g., removed from their post), and falling in line and adhering to how things are done (e.g., informal rules and practices) within the institution. These informal practices include using bureaucratic delays and increased red tape in handling cases, which are driven by the *self-interested behaviors* of individualism and protectionism in the Law and Policy loop.

Further, public officials are expected to adhere to how things are done in the office by their peers – *adopting existing practices* in the Professional Development and Motivation loop. Doing otherwise—for example, innovating or challenging practices—results in ridicule, suspicion, or mistrust. People can sometimes face isolation and outright hostility from colleagues and are cut out from work opportunities. The expectation to adhere to how things are always done reinforces the 'old or regular' ways of doing things, undermining innovations or adaptation to new processes among officers to implement the removal of corrupt officials under Section 46. Officials, especially junior officers and new recruits, comply because they want to fit in and do not want to make their life difficult at the workplace.

1.4 Consult, consult, consult

Staff at PSC are expected by their peers/superiors to consult widely before finalizing their recommendation to the Board.[3] This direct norm was clearly described by the PSC officers as an expectation held within the Commission.   Officers explained that they are expected to not only consult more senior colleagues to determine if there are additional facts or perspectives to take into account, but also peers who may have had similar files.   The drive to consult was driven by the fear of making a mistake, which has reputational consequences within the group as well as practical ones – the public servant who is the subject of the case may instigate legal action for perceived unlawful conviction and removal from the job.

This norm is influenced by the other identified norms, namely civil servant's desire to stay out of trouble and protect your own. By consulting widely, they are able to gain a better sense of the invisible connections convicted individual possesses, which provides them insight into how to navigate the case so as to not endanger their own or themselves. These actions also provide others a path to inject opinion and influence – appropriately or not.

The norm "consult, consult, consult" drives behaviors within *varying interpretations of the law* found in the Law and Policy loop as well as, *adopting existing practices* in the Professional Development and Motivation loop.

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[3] Readers are reminded that the inquiry had limited engagement with PSC and so the generalizability of this finding should be viewed with caution.

2. What values influence public officials' behavior?

In this section, we present some of the values that appear to be held by public officials inside the Commissions. ***Values are individually held standards of behavior regarding the right way or not to behave in a given situation***. Values are influenced by a wide range of factors: upbringing, religion, family, friends, culture, education, etc. They are typically influenced by, but are not dependent on, what others do or think a person should do. Dominant values are those that are widely shared amongst a community or culture. They are shared and passed along through the media, institutions, religious bodies, and family.

Some of the identified values appear to directly align with the social norms held within these groups. This means the expectations of the right way to act and the values align (i.e., dictate the same behavior). This is significant for those seeking to change these behaviors, as alignment makes them more entrenched and thus more difficult to change. To make it easier to see the connection those norms are presented with their associated value below.

2.1 Helping one's own

Providing support and showing loyalty to family and friends, or "helping one's own", was expressed as a shared value among officials within public service. This value encompassed protecting one's own when in trouble, as well as offering a hand when needed, or connecting someone with an opportunity when they arise. The value contributes to similar behaviors as the *protect your own* indirect norm, acting according to *self interest* in the Law and Policy loop, and *compromise in decision making* in the Leadership loop.

Helping one's own is also a powerful *indirect social norm*, which leads kin to expect that kind of protection or help, and sanction people who do not offer it. The norm described earlier, "protect one's own", is one manifestation of this indirect norm within a particular group on a certain topic (e.g., public servants with a role in administrative sanction). It is the *expectation* and *pressure* associated with helping one's own that lead officials to use their positions and influence to favor or support their "own". It is also used to punish their transgressors in reprisal. Families, clans, friends, or communities expect their member in a position of power to utilize their influence and position to their advantage, by helping make it easier for them in case of any problem or when they need help (including, as some officials remarked, utilising the loopholes in administrative procedures to try and help their families, friends, or community members while working within official procedures or rules).

Social Norms vs Values?

Values influence people's behavior, as do social norms. But what happens when social norms dictate behaviors that are contrary to an individual's values? Will they act against their values and align to the norm? Or will they withstand the pressure of the group and act according to their values?

In many cases, social norms are strong enough that individuals will follow them even when the norms are contrary to their beliefs and values.

The fact that the norm of helping one's own and providing for family is also a widely shared value strengthens the power of the norm and people's desire to comply with it. It also suggests that work may be needed to reflect on values and attitudes about what "helping one's own" means and its relation to other values as a prelude to addressing the norms themselves (more on that in the Recommendations section).

The value also appears to be strongly aligned with all identified social norms: protect your own, serve your boss, consult, and not to contribute directly to administrative sanctions proceedings. This makes the value

exert stronger influence than the law that requires enforcement of administrative sanctions for corrupt behaviors.

2.2 Treat people right

Treating people right is a value that embodies fairness and "humane and courteous" treatment of people. The value contributes to *compromises in decision making* in the Leadership loop. This is a value that surfaced strongly from our discussions with the PSC. People we talked with believed that in any decisions regarding disciplinary measures (including administrative sanctions), it is important to consider the likely impact of any decision or action on a colleague, their immediate family, and larger social network like the clan or community.

What are Values?

Values are individually held standards of behavior regarding the right way or not to behave in a given situation.

They also believed that fairness demanded that punishments be proportional to the severity of the infraction—and specifically, in the case of Section 46 sanctions, that people who engaged in smaller acts of corruption be punished less severely than those who engaged in grand corruption.

This understanding of "humane and courteous" is based on the assumption that enforcing administrative action has negative outcomes on the person and those close to them. The loss of one's job affects their ability to provide and care for their family if they were the bread winner; their children would be out of school and they would not be able to meet medical and other needs of the household. During discussions with PSC staff, they shared the case of two officers who were interdicted for close to nine years as part of a disciplinary measure. During the interdiction, the two officers had to travel back and forth to the responsible offices, which further wasted the meagre resources they had. The PSC officials said that it was "humiliating, stressful, and distressing for the officers," adding that the two affected persons both died within a year of being reinstated on their job.

Empathy for the dire impact administrative sanctions can have on the emotional and physical wellbeing of those affected shapes the actions of the officials charged with implementing the sanctions: to make sure they are humane and fair enough in their treatment of others. To the extent that the interdictions, especially for smaller (petty) acts of corruption, are the same as those for bigger (grand) acts, those with whom we spoke in PSC also considered the punishment to be unfair—disproportional to the crime committed, particularly given the consequences of removal for that person.

3. How do social norms and values fit together?

The social norms and values identified through this inquiry appear to be interconnected in many ways. This interconnection means they are not entirely distinct or different, but feed into each other to cause some behaviors. When direct and indirect norms and/or values align and reinforce the same behavior, the more difficult that behavior will be to change; thus, it is important to understand those connections if one hopes to change behaviors that affects administrative sanctions. The team was not able to validate their assessment of the various interconnections that exist and acknowledge that this analysis is as much based on logical hypothesis as evidence.

In dispensing administrative sanctions for corrupt practices, the direct social norm *avoid contributing directly to administrative sanctions proceedings* appears to be an overarching social norm that underpins corrupt behaviors and decisions regarding administrative sanctions. The norm expects that officials should find avenues within official procedures to help victimised colleagues avoid punishment and is buttressed by the indirect social norms: *protect your own* and *serve your boss*.

To **protect your own** and **serve your boss**, PSC officials are expected to **consult** widely with their senior colleagues and peers to ensure the final decision reached on administrative sanctions **treat people fairly**, in ways that are considered "humane and courteous". And to attain fairness, officials are expected to do their work in ways that **do not cause trouble for colleagues,** which means, **avoid victimising affected colleagues or getting them into trouble** and **falling in line and adhering to how things are done** (i.e., informal rules and practices)within the institution. Overall, "help one's own" appear to be an overarching value that permeates the entire administrative sanctions process and seems to align with the different parts of the causal loop map, which makes it exert a stronger influence on corrupt behaviors.

E. Recommendations

No one kind of program or effort will induce consistent and authentic compliance with Section 46. As the systems map suggests, non-implementation of Section 46 is influenced by many factors: institutional or personal attitudes and motivations, leadership, political dynamics, and social norms. The interaction of these factors makes the system of non-implementation resilient to efforts to change it. This is also why more direct technical interventions are unable to generate enduring behavior change, as they don't respond to some of the more important drivers in the system.

We see several potential points of entry, outlined below. Recognizing that no single initiative is likely to create a consistent and definitive answer to the application of Section 46, we believe the ideas below can have ripple effects in the system that have the potential to generate positive progress. Effective programming will need to be multi-faceted, linking work both on legal/administrative factors and on social norms—either within the program or in coordination with other efforts working in those areas.

1. Addressing institutional and structural factors that make implementing the law difficult by creating ambiguities or conflict that open opportunities for people to pursue personal interest or follow social norms

1.1 Create an ongoing inter-institutional working group to harmonize and simplify processes and regulations.

A number of dynamics identified in the analysis significantly contribute to continued difficulties implementing standardized processes, including:

- Differing perceptions across institutions of what is required to comply with Section 46, and how Section 46 and PSC processes fit together. Specifically, those working within the PSC believe there is a conflict between their own process and Section 46, and while they respect the decision of the court, they claim dismissal must occur in accordance with their PSC processes. Whether or not a conflict actually exists, the widely divergent beliefs between PSC and other institutions hinder implementation of Section 46.

- Friction in the relationships between institutions, leading to lack of cooperation and inadequate communication. The tension and poor communication between institutions leads to "siloed" roles and responsibilities and fragmentation, opening opportunities for people to pursue their personal interest or rely on social norms as a guide to behavior.

These issues cannot be solved by standardizing forms and processes alone, as there are many ways even the best designed instruments and processes can be undermined due to miscommunication, lack of cooperation, or passive resistance. We therefore recommend establishing an ongoing inter-institutional, mixed working group of both senior- and mid-level officials on harmonization of Section 46 implementation processes. The

working group would not only address technical solutions to facilitate implementation of administrative sanctions (such as requirements, instruments, and processes for implementation of S.46), but also, and primarily, focus on establishing relationships, mutual understanding, and ongoing communication channels that can enable participants to cooperate more effectively and help their institutions avoid or overcome friction and disagreement when implementing S.46. The success of this working group would be measured not only by the results (i.e., greater enforcement of administrative sanctions), but also by the quality of cooperation and communication between the institutions on these issues; strengthening relationships will be a key outcome of this process.

While SUGAR might convene this group, we recommend that SUGAR hire a skilled external facilitator to develop and facilitate the process. Given the tension between the institutions, a neutral facilitator with no specific stake in or perspective on the outcome is more likely to engage participants and gain their trust. The facilitator must also bring "soft skills" to help participants improve communication and understanding, as well as problem-solve in more collaborative ways. Qualifications and skills of a potential facilitator would include:

- Skills and experience in dialogue—especially facilitating communication and dialogue processes, and building mutual understanding between groups that are in conflict or tension, particularly in organizational settings

- Skills and experience in facilitating difficult group dynamics

- Mediation and conflict resolution experience, bridging differences between groups, and promoting collaborative problem-solving between groups

- Team building experience would be useful

While it would be helpful for the facilitator to have some technical knowledge, the facilitator should not be a technical expert on administrative law and sanctions, but rather in communication and dialogue processes.

A number of SUGAR initiatives have focused on streamlining and standardizing forms and processes, including for Standing Orders and case management. These are important initiatives that should continue and be coordinated with, and potentially integrated into, the work of this group.

1.2 Extend the effort to harmonize and clarify processes and regulations beyond cases involving officials convicted under Section 46.

We recommend expanding the effort to include pending or incomplete cases where an officer has been interdicted or is under investigation, but not yet convicted (or acquitted). While focusing on apparently easier cases of post-conviction sanctions is a reasonable strategy to generate some quick successes, our analysis found that the issues are linked, and focusing only on completed cases could have unintended negative consequences. First, the question of how to deal with pending cases is particularly important for the PSC, where officials believe there is lack of clarity about what to do. Second, achieving greater clarity and harmonization of processes post-conviction, without addressing behavior in pending cases, leaves open tremendous opportunity for corrupt behavior. The lack of clarity in pre-conviction cases also feeds opportunities for officials to pursue personal interests or behaviors dictated by social pressures in a similar way. If this area is not addressed, progress toward compliance with Section 46 (i.e., removal from payroll) may lead to greater efforts to prevent conviction or conclusion of cases.

1.3 Align laws and regulations more with social norms.

While the clear zero tolerance message implicit in Section 46 is an important one, as it signals a commitment to sanction corrupt behavior and encourages re-evaluation of the practice, it can also create a barrier to social norm change. Social norms research suggests that laws can be a positive force in changing social norms by signaling that a practice is bad and encouraging social re-evaluation of it. However, if a law deviates too much from the social norm, research suggests that people will often ignore the law.[4] With that, public discussion will also be foreclosed, undermining the possibility for norm change. More moderate laws (that more closely follow the social norms and values) are more likely to be obeyed and/or enforced without great resistance.

The mandate of Section 46 appears to deviate significantly from values of "humanity" brought up mostly by PSC, as well as social norms of supporting and protecting family, colleagues, and community. This analysis highlighted a strong concern about fairness, the need to be "humane," and consider the consequences of dismissal for the accused. This includes the consequences on the individual directly, but also on their family and community, given that these individuals are subject to indirect norms nearly everyone experiences within their kinship networks to protect their family. In this context, there was a sense that dismissal is not always a fair sanction because the punishment is often disproportionate to the crime, especially in more "minor" cases of corruption. People felt that imposing the same penalty for minor and major corruption was unfair, because most cases of corruption involving high level officials are never prosecuted, while the smaller, lower-ranking or less influential offenders are swiftly prosecuted and punished.

There may be a window of opportunity following the 2021 election to develop ways to bring mechanisms for implementation of Section 46 (i.e., kinds of sanctions) closer to the values and social norms of those who are charged with implementing it (as well as the community at large). This would enhance the likelihood of consistent enforcement of Section 46 penalties. There are potentially many options grounded in Ugandan law, which is cognizant of distinctions between grave and minor offenses, such as a the "2 strikes" approach if you have a

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Improving compliance by aligning laws and social norms: Some examples

- In Bogota, Colombia, which suffered from a high death rate from firearms, Mayor (1995-97 and 2001-03) Antanas Mockus did not ban firearms completely, but banned them on weekends (when more shootings occurred in conjunction with drinking); the partial ban was enforceable and prompted local discussion about the purposes and benefits of firearms regulation.

- In Senegal and Gabon, comprehensive bans of polygamy failed; they were regularly defied. The government shifted its approach, passing legislation that required a choice of polygamy or monogamy at the time of the marriage contract. This was more effective in reducing polygamy.

- In conservation, comprehensive bans and punishments for trade in endangered wildlife failed to reduce both demand for such wildlife and trade in Amazonia—in part because enforcement was scarce or uneven (focused on "easy" cases). Rules permitting trade in more harvest-tolerant species while banning trade in the most vulnerable wildlife were more effective.

[4] *See* Acemoglu, D. & Jackson, M. 2017. "Social Norms and the Enforcement of Laws." *Journal of the European Economic Association* 15(2): 245-295; Mackie, G. 2017. "Effective Rule of Law Requires the Construction of a Social Norm of Legal Obedience." In Tognato, C. *Cultural Agents Reloaded: The Legacy of Antanas Mockus.* Cambridge, MA: Harvard University; Parisi, F. & Wangenheim, G. "Legislation and Countervailing Effects from Social Norms." Washington, DC: George Mason University School of Law, Law and Economics Working Paper Series; Carbonara, Emanuela, Francesco Parisi, and Georg von Wangenheim. 2008. "Legal Innovation and the Compliance Paradox." Minnesota Journal of Law, Science, and Technology 9:837-860.

good record or offering a range of forms of dismissal and suspension. What measures will work cannot be determined in advance or without further understanding of the particular opportunities and constraints that will prevail. At the appropriate time, development of specific recommendations could be a focus for the working group outlined in recommendation **1.1** above.

1.4 Invest in ongoing professional development for officers.

The lack of ongoing professional development for staff is connected to a number of dynamics in the map that lead to delays and failure to complete the process of removal of convicted officers – and therefore it is important. While we do not have enough data to draw definitive conclusions about the state of knowledge within the institutions, we encountered Human Resources Officers who did not know that the period of removal for public officials convicted of corruption is 10 years. This lack of knowledge increases the reliance on existing practices or informal rules and their adoption without question. Professional development should not only include education on the content of the law, but also address how to make the law work, how to deal with challenges to implementation, and ethical and professional standards of conduct. In this way, professional development and education might be more effective, also helping reinforce the notion of a public servant's role as serving the public, not serving their boss.

Professional development should not be undertaken as a stand-alone initiative; if it is, and other contributing factors (i.e., the social norms and informal practices themselves) are also not addressed, then this is unlikely to succeed. By itself, professional development will not address the lack of implementation of Section 46, as while it may influence individuals' attitudes and capacities, it does not directly address social pressures. Moreover, substantial research shows that when people see a conflict between what they "should" be doing (are expected to do—as would be the focus of professional development) and what is normal practice, they will follow the practice.

2. Addressing social norms

Addressing the institutional factors helps make it easier to follow the law rather than the social norm. Directly addressing the social norms is necessary to relieve social pressure and align behavior more with the expectations of the law, both in relation to *vertical* social pressures ("follow your boss no matter what"), as well as horizontal (peer) pressures ("avoid contributing directly/overtly to administrative sanctions processes").

2.1 Weaken vertical pressures: Constrain the power of senior officials to use professional sanctions to enforce social norms.

Social pressure to engage in behavior that hinders removal of convicted public servants from payroll come from both peers and people at higher levels of the hierarchy. Vertical pressures (from higher-ups) are particularly strong because of the capacity of more senior officials to enforce the norm with institutional mechanisms (i.e., *professional* sanctions). People who raise concerns about a practice, or who may try to advance the removal of a convicted person when a superior does not want it, are often accused of insubordination and penalized professionally. The fear of victimization and "fast tracking" if people raise questions about a practice or request keeps them silent and obedient; the fear stems in part from the *severity* of the sanction. It also contributes to low self-efficacy and a sense of powerlessness among those who would prefer to follow the law.

If the ability of supervisors to impose professional sanctions on subordinates for non-compliance with illegal or unethical (often serving their personal interest) demands or expectations were reduced, the social norm, "serve your boss", would slightly weaken. With a less severe professional sanction, possibilities for individuals to deviate from the norm in response to expectations that are not in accordance with the law would increase.

We recommend developing avenues for more junior level officials to report pressure from their superiors without fear of repercussions, together with a review mechanism for such cases when they arise. These could include:

- Providing digital tools for reporting—such as [Ethics Point](#), a digital/online reporting tool that allows employees to communicate issues associated with unethical or illegal activities safely and honestly, while maintaining their anonymity and confidentiality.

- Create a committee within each institution and procedures to handle claims reported through confidential mechanisms of unfair dismissals, transfers or working conditions.

- Stand up an external committee, where appointments are not linked to the ruling authority and members are vetted.

- Automatic review processes for professional sanctions of a particular severity (e.g., firing or transfer).

These would need to be designed to fit the particular processes and constraints of the Ugandan civil service and would benefit from the input of junior officers themselves.

2.2 Change the "avoiding direct contribution to administrative sanctions processes" norm by identifying and connecting "positive deviants".

When a social norm motivates behavior, changing behavior requires both weakening the existing social norm and creating a new one. There are several approaches, based on social norms research, that are relevant here. First, strengthening positive norms and values that contradict the direct norm to avoid lending direct, overt support to administrative punishment processes. Second, reinterpreting "indirect" norms, such as, "do not cause trouble for colleagues", that informs it.

2.2.1 Identify and support "positive deviants" and trendsetters.

Positive deviants are people whose behavior deviates from the norm. Trendsetters are people who resist existing norms, spearhead change, and inspire and mobilize others to follow in their footsteps. While we learned that there clearly are people (including among the participants in the workshops/interviews) who try to escape engaging in practices that prevent the enforcement of Section 46 (and the law generally), it was not possible to identify positive deviants or trendsetters with the limited time and limited numbers of public servants who participated in the sessions. We recommend undertaking a more extensive and rigorous analysis to identify these people within the institutions of concern.

2.3 Develop a selective, high-status, inter-institutional professional development program targeting people with records of integrity.

The professional development program would be by application only, and would bring together public servants from PSC, ODPP, JSC, IG, and MOPS for training/education, leadership development, and dialogue over the course of one year. The participants would receive training/knowledge on a variety of relevant topics, including legal education, education about social norms, and policy development, from experts and senior level officials within their institutions who have reputations for integrity. Participants would also engage in facilitated collective dialogue, analysis, and planning about enhancing alignment of behavior with legal requirements. The goal would be not only to support and develop people who are "positive deviants", but also to develop a network of people with a common interest and record of integrity to act as a new "reference group" that could work together and push each other to resist the social pressure not to enforce the law. In addition, the involvement of people from several agencies will also build relationships that can help improve communication and cooperation, and address gaps in workflow that have to date prevented full enforcement of Section 46.

We cannot predict the particular ideas and solutions the group will develop, as these will emerge from a collective analysis and planning process driven by them and their knowledge of what might be feasible. The program would be designed to support them first with knowledge, attitudes, skills, and ideas, based on knowledge about how social norms function and change. A second support would be to diffuse new ideas and practices to weaken the existing norm (by showing there are people who can and do deviate from the norm) and begin to strengthen a norm of integrity within and across their institutions.
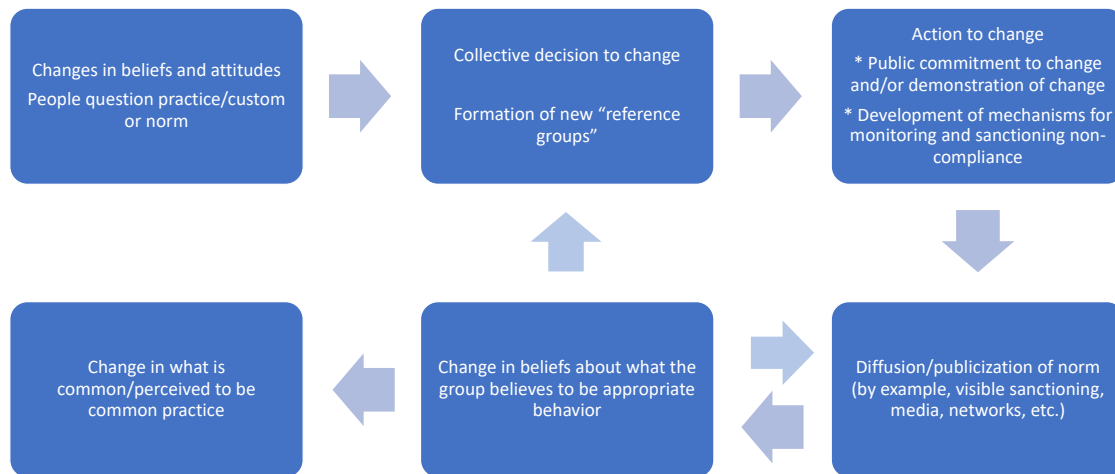
Adapted from Bicchieri, C. *Norms in the Wild* (2017)

Social norms experts have proposed that social norms creation entails the following steps, which are not a linear process, but rather require time and iteration: the group develops consensus around a new rule of behavior, creates new expectations about what is approved/disapproved, and builds on that to change behavior and, eventually, people's beliefs about what is common and typical. The chart below summarizes the stages in the creation of a new norm. The process often involves people who favor change to join together in a new "reference group" that allows for mutual support, but also provides a new reference point for members to determine what is typical and approved.

3. Engage at the broad public service level in a parallel, yet strategically linked processes.

3.1 Consider support for "Integrity Icon"-type programming in Uganda.

Integrity Icon (formerly Integrity Idol) is a creative media campaign run by citizens that "names and fames" accountable public officials to highlight positive role models, especially for youth.[5] This effectively provides a way of turning positive deviants into trendsetters and supporting them. While this program would not directly and immediately address the non-enforcement of Section 46, it would be a good complement to programming within the concerned government institutions, helping to change perceptions of what it means to be a public

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[5] Integrity Idol (now Integrity Icon) is a creative media campaign run by citizens to support honest government officials and inspire a new generation of responsible leaders. Using online and offline tools, it "names and fames" accountable public officials to highlight positive role models, especially for youth. Officials are nominated by citizens nationwide, vetted through a rigorous process to verify their commitment to seeking integrity in their professional and personal lives. The finalists are filmed, and the films widely publicized in the media and public forums, and a single winner is voted by citizens during the time the films are on air. It was started in Nepal, but has been running successfully in Liberia, Mali, Niger, Nigeria, and South Africa, among other countries.

servant, and starting to change perceptions about widespread norms underpinning corruption (e.g., protecting your own, helping those who help you, etc.). In addition, it has been shown that the media outreach, citizen awareness, and support it has generated, can provide support and protection for these "icons" and their colleagues to resist pressures.

3.2 Reinterpret meta-norms.

Finally, we recommend exploring whether key current meta-norms, such as reciprocity and kinship, could be reframed and reinterpreted to support, rather than undermine, integrity. Indirect norms related to reciprocity ("return a favor") and family obligations ("support one's own") inform and reinforce several of the social norms identified in this analysis that affect implementation of Section 46, such as, "do not cause trouble for colleagues", or even "serve your boss." Traditionally, however, reciprocity did not mean one had to do *anything* to pay you back for a favor. Similarly, while kinship obligated one to support one's family, it also placed expectations on groups or communities to be held accountable for the actions of their own members (i.e., bear collective responsibility for a member's actions and be obligated to discipline those who did not behave appropriately). Over time, with modernization of the economy, demographic shifts, and conflict (among many things that have affected communities), these norms have come to be interpreted from a more individualistic perspective (i.e., used for personal advancement).

While we have not gathered enough information in the analysis to recommend a *specific* strategy or program, experience in Rwanda suggest some opportunities. It may be possible to initiate dialogue on the nature of these fundamental meta-norms and promote a reframing that could revive a more collective interpretation, grounded in pride in, and accountability for the group's behavior and reputation. The forums could range from a national dialogue led by the Elders Forum (in conjunction with youth leaders), or integration into an Integrity Icon-like effort, to inclusion in the working group recommended in 1.1, and integration into professional development (like that suggested in 1.4), or even school curricula.

"Imihigo" mechanism, Rwanda

In Rwanda, the government married the tradition notion of *imihigo* ("vow to deliver") to modern, performance-based mechanisms for service delivery and accountability to ensure that local leaders would deliver public services and not use power for personal gain. They drew on and emphasized the social expectations around personal responsibility and accountability to deliver on public commitments associated with *imihigo* in formulating public service contracts that local authorities committed to (publicly). These were contracts, but the association with *imihigo* imbued the obligations with special significance. Authorities who fulfilled their pledges were celebrated as *role* models and honored in ritual ceremonies in their communities, while those who did not were humiliated and perceived as incapable.

*See Jackson, D. & N. Kobis. *Anti-corruption through a social norms lens*, *U4 Issue* 7:2018 (Bergen, Norway: U4/Chr. Michelson Institute, 2018); Scher, D. & C.MacAulay. "How Tradition Remade Rwanda." *Foreign Policy*, January 28, 2014 (https://foreignpolicy.com/2014/01/28/how-tradition-remade-rwanda/).

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4. Share the analysis and recommendations

In order to ensure transparency and confidence in the process, and to promote continued engagement with the effort to implement Section 46, it is important that the report be shared with those who participated in the interviews and workshops, as well as with those who may be in a position to support implementation of the findings of the analysis (e.g., DFID, EU). In addition, we also recommend directly sharing the report with

other stakeholders who may have directed their staff to participate in the analysis or who are managing the implementation of Section 46 (e.g., senior leaders in the public service, such as the Chairpersons of the Commissions and Accounting Officers). This would be most effectively done through a presentation, meeting, or other form of direct communication.

Appendix 1: Team Bios

Cheyanne Scharbatke-Church is a Professor of Practice at the Fletcher School of Law and Diplomacy, an international affairs graduate school at Tufts University (Boston) and a Principal at Besa: Catalyzing Strategic Change (Calgary). As a Professor of Practice, she teaches courses in program design, monitoring and evaluation in fragile and conflict affected contexts and as well as a course on corruption and conflict. She is currently the Co-Director of the Corruption, Justice and Legitimacy program which seeks to improve anti-corruption programming in fragile states. Her previous work on corruption included identifying corruption risk areas in humanitarian practice for Transparency International and the exploration of corruption and conflict. She is the curator and editor of the [Corruption in Fragile States](#) blog.

She has held senior positions with the CDA (Boston), SFCG (Washington) and INCORE (Northern Ireland). In 2009, Cheyanne founded Besa; a social enterprise committed to catalyzing significant change on strategic issues in places experiencing conflict and structural or overt physical violence. Besa has experience working effectively with a wide range of organizations, including ICRC, IDRC, US State Department, UN Peacebuilding Fund and ABA/ROLI. Cheyanne attended Queen's University and the London School of Economics.

Diana Chigas is professor of the practice of international negotiation and conflict resolution at The Fletcher School of Law and Diplomacy and also serves as senior international officer and associate provost at Tufts University. As senior international officer, she is responsible for leading the development and realization of a university-wide global strategy. As part of her role at Fletcher, Diana is the Co-Director of the Corruption, Justice and Legitimacy Program.

Diana has over 25 years of experience as a facilitator and consultant in negotiation and conflict resolution. Her work has included the development of strategies, training and advice on preventive diplomacy in the OSCE, training for the United Nations and several regional organizations, "track two" dialogue in El Salvador, in South Africa, Ecuador and Peru and in the Georgia/South Ossetia peace process, and facilitation of inter-ethnic dialogue in Cyprus. Her current research interests include cumulative impacts of peacebuilding and understanding the dynamics of corruption in conflict-affected and fragile contexts in order to develop more effective anti-corruption programming.

Teddy Atim, PhD is a visiting fellow and a research consultant at the Feinstein International Center, Tufts University where she leads and carried out research on the themes of: remedy and reparation, accountability for alleged war crimes and crimes against humanity, traditional justice mechanisms, gender and youth labour markets participation. She also carried out research on livelihoods, access to service, governance/state legitimacy and corruption in post-conflict periods.

Ms. Atim has nearly 18 years of experience, drawing on her work both as a practitioner and researcher in conflict and post-conflict periods. She has carried out research and worked closely with local, national and international partners in Uganda and beyond, advising on national transitional justice and reparations. She has also worked with donor groups to recommend and manage support for humanitarian aid, recovery, peace building and transitional justice in Uganda. She is also a research collaborator on a multi-country research project working in Uganda, Liberia, Sierra Leone, Rwanda and Democratic Republic of Congo, where she leads the research themes on the project. Atim's research interests are: youth, violence, conflict and post-conflict studies; gender and armed conflict; transitional justice, with emphasis on remedy and reparation, and post-conflict reconstruction and peace building.

Appendix 2: Working Principles

The team is committed to the following working principles:

- Collaborative decision-making with SUGAR

- Respectful engagement with all stakeholders

- Mindfulness of local context and realities and awareness of our position as outsiders to the process

- Commitment to developing a process that generates useful results that enables internal progress

- Proactive responses to problems and new opportunities

- Forthright communication