Ingredients for an Effective Public Ethics Training Program:

Most of us will agree that ethics training is vital to ensuring a government whose employees act with integrity. But many employees find training on their ethical obligations to be some other things as well: difficult to understand, overly preachy, or just plain boring. We all know that people retain information better when it is presented in an interesting and memorable way. The challenge with ethics training is to take this important, but not always accessible, subject matter and make it stick in the minds of government employees so that they do the right thing when facing an ethical dilemma.

In 2011, Austin, Texas, the nation’s 11th largest city, tackled this challenge with a new campaign to improve ethics training for our more than 12,000 employees. We recognized, of course, that holding our employees to the highest ethical standards was critical to ensuring the public’s trust. We also realized that ethics issues are complicated, and the right answer is not always readily apparent. Accordingly, in addition to substantive ethics training on the various rules and regulations, we decided to focus our efforts on helping employees identify possible ethical issues and on encouraging consultation with supervisors about such issues.

We also wanted to come up with a memorable catch-phrase or slogan for the program, so that employees would remember it. We ultimately settled on “Grow Good Government” for the overarching campaign, and as a subset of that, FARM, an acronym for the four questions employees should ask themselves about any ethical issue.

The Grow Good Government Campaign:

We first devised a memorable new theme for our ethics program as a whole: Grow Good Government, using a tree as an illustration. We decided on the tree image because trees are strong, natural, and adaptable, and, of course, they grow, like we hoped our employees’ knowledge of and comfort dealing with ethical issues would grow. We also wanted to utilize the symbolism of the roots to show that integrity in government should be deeply rooted, and the branches to demonstrate the different paths that different decisions can lead to.

The next challenge was to find a way to help employees identify ethical issues in the first place, and then to encourage them to raise such issues with their supervisors. We were looking for an acronym that employees could remember that would trigger their consideration of the important questions, so it had to be simple, and fit within the larger theme of Grow Good Government. We came up with FARM.
FARM:

FARM is a set of quick and easy questions public servants can ask themselves to see whether a situation raises an ethical issue that ought to be discussed with a supervisor. The acronym stands for:

**Feeling:** Will this make me or my supervisor uncomfortable?

**Advantage:** Will anyone get, or appear to get, an unfair advantage?

**Risk:** Will this put the City at legal or economic risk?

**Media:** Will this make an unfavorable headline in the paper?

Visual Aids:

For the campaign to be successful, its core instructions needed to be easy to access and impossible to forget. To that end, we developed a series of eye-catching visuals to reinforce our message.

**City Ethics Postcard:** Given to all city employees, the postcard lists clarifying questions employees can ask themselves when facing a potential ethical issue and instructions on how to **anonymously** report wrongdoing. By serving as a handy resource guide, it encourages city employees to consider public integrity in their daily work.

**Wanted Posters:**
Humorous images are non-confrontational, but subtly remind employees of criminal implications of misconduct. They are also good at relaying information about how to report wrongdoing.
Campaign Posters:
We created campaign posters to use on our website and to post around government offices to reinforce the messages we were expounding. The first poster links Grow Good Government with the FARM process in a lighthearted way; the second is intended to inspire employees to do the right thing by appealing to their inherent sense of integrity and trustworthiness.

Note that another way to utilize visual aids in helping employees identify ethical issues is to use a flow chart instead of an acronym. Simple flowcharts can also be effective when placed on easy-reference postcards and distributed to employees. The Los Angeles City Ethics Commission uses the below chart to help city officials and employees determine what, if any, gifts they can accept.

Regular Training:
The Austin ethics program includes a robust training component, which has evolved and improved over time. We provide mandatory training for all employees every year, conducted in-house in the city agencies by managers within their workgroups. This method allows managers themselves to participate in the trainings and emphasize their support for the ethics programs. Managers are also given the chance to reiterate to employees the importance of contacting supervisors and/or the ethics and compliance office as well as the usefulness of FARM when faced with any ethics issue.

Part of the training includes videos featuring actual Austin employees role-playing various ethics scenarios, which have proven to be highly popular with our audience. Training also includes an online ethics module.

Austin also provides specific ethics training for supervisors as part of their broader supervisor training, including separate sessions for new supervisors and continuing supervisors. Such training is integral to the success of the program, as supervisors help to set the tone for compliance and ethics office-wide and are responsible for creating an ethical culture within their workgroups. Finally, we provide specialized training for executives, city council aides, and city boards and commissions.

We support these training sessions with our various campaigns, including the poster campaigns described above, our “In the Loop Series,” a monthly message in the city online newsletter with links and FAQs, a summer discussion series on moral leadership with city executives, and the Ethics Bowl, a competition pitting department teams against one another to show their ethics knowledge based on various ethics case studies.
Employee Feedback Survey:

Austin also utilizes an annual “Listening to the Workforce” survey that covers a wide variety of topics, including ethics. We suggest using such a survey to determine how knowledgeable employees are about how to report ethical violations, and how comfortable they are doing so. Some possible prompts would be:

- Employees in my work group behave ethically in the workplace.
- Management in my department sets a good example by following the laws and policies that apply to their jobs.
- If I become aware of unethical behavior, I know how I can report it.
- I am confident that quick and decisive action will be taken by my department if wrongdoing is discovered in my workgroup.
- If I have a complaint in my department, it will be handled fairly.
- Employees in my workgroup can report any unethical behavior they see without fear of retaliation.
- I am familiar with where to look for city ethics guidance (such as the CityEthics website, City Code, Personnel Policies, and Administrative Bulletins).
- I am familiar with the Administrative Bulletin on “Fraud, Waste, and Abuse Prevention.”

Gauging Success:

The response to our ethics program and campaigns has been very positive. We noticed an increase in questions to the ethics and compliance office and have received high marks from employees. Of course, we continue to look for fresh, new ways to get the ethics message out to our employees – particularly the message that anything questionable should be raised with a supervisor.

Takeaway Tips

To develop a similar, proactive program, city officials should:

- Choose an overall theme for the campaign
- Create a related catchphrase for what city employees need to remember (i.e., FARM)
- Emphasize thinking through the problem and involving supervisors
- Create a postcard that an employee can keep at his/her desk
- Hang posters to reinforce the theme and message
- Train employees in large groups to increase efficiency and offer frequent trainings
- Make training videos using actual employees
- Provide specific training for supervisors and new employees
- Issue employee surveys that include questions about ethical issues to tailor future training and to gauge effectiveness of the campaign

This publication is part of an ongoing series of contributions from practitioners, policymakers, and civil society leaders in the public integrity community. If you have expertise you would like to share, please contact us at CAPI@law.columbia.edu.

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