



*By the Book?*

Ethics, Accountability and

Navigating the Gray

Presented by LeeAnn Pelham

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Ethical dilemmas  
are often described  
as slippery slopes;



unseen until one falls  
and is unable to regain **sure footing**.

<http://www.isaca.org/Journal/Past-Issues/2008/Volume-3/Pages/Auditor-Ethics-for-Continuous-Auditing-and-Continuous-Monitoring1.aspx>

# Accountability in the Gray Zone



*Images:* LeeAnn Pelham

# Ethics

“Standards of behavior that tell us what humans ought to do in their personal and professional lives.”

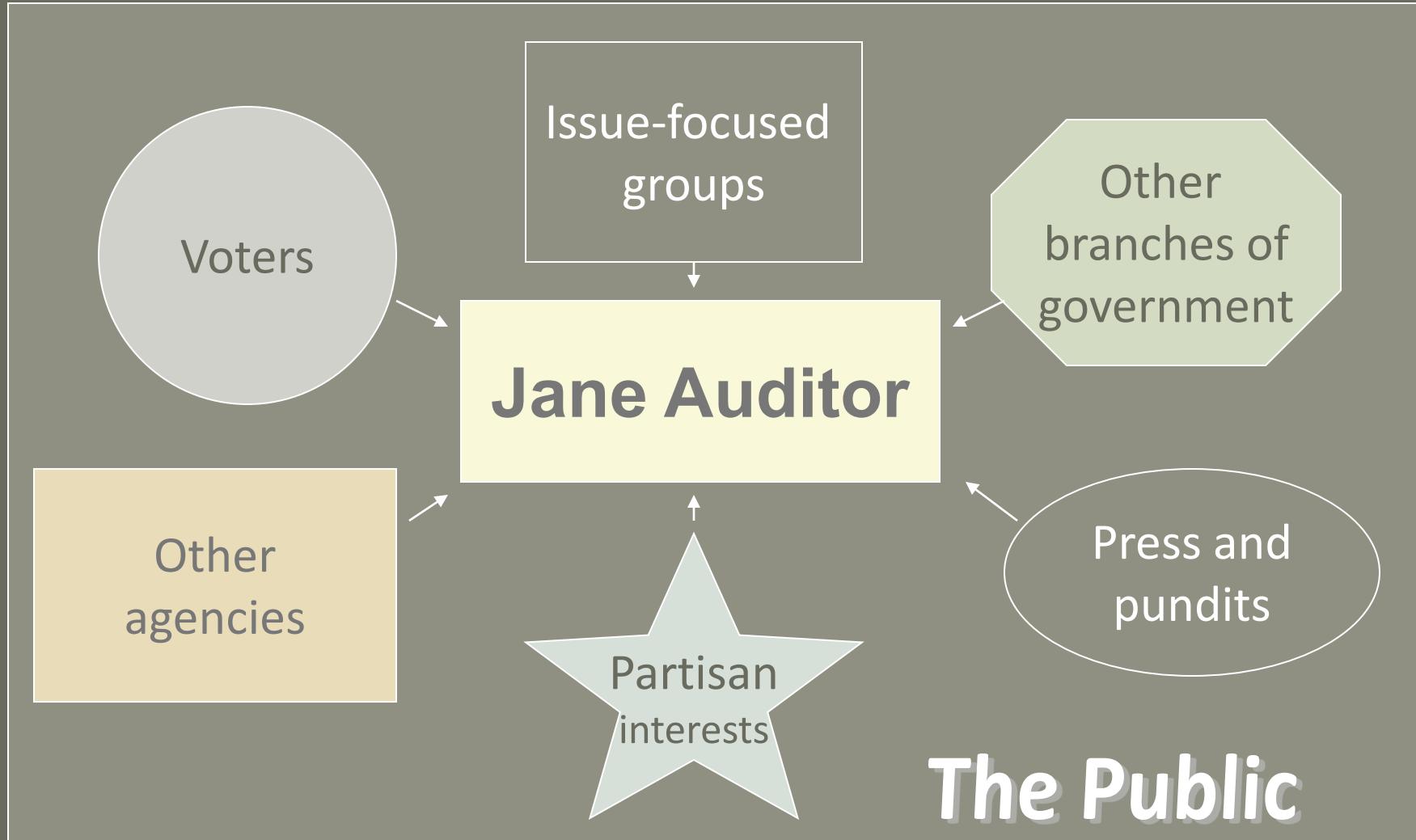
*Markkula Center for Applied Ethics  
Santa Clara University*

# Ethical Conflict

“An ethical conflict exists when the duties toward one group are inconsistent with responsibilities to another.”

*Auditing and Ethical Sensitivity*  
Gordon Cohn, PhD.  
City University of New York

# Accountability Landscape



# Governmental Ethics

“...is not interested in the notion of ‘being good,’ rather it is concerned with decision-making conflicts between public and private obligations.”

*A Call for Ethical Standards: Corruption in Orange County*

Orange County Grand Jury Report on Ethics, April 2013, p. 4

# Ethical Principles 1.14

- a. the public interest
- b. integrity
- c. objectivity
- d. proper use of information,  
resources, and positions
- e. professional behavior



*“The Yellow Book” Ch1  
GAO-12-331G Government Auditing Standards*

# “Responsible Conduct”

An Individual  
Reflective  
Approach

“Professional  
Socialization”

Organizational  
Culture

Structures and  
Systems

*Cooper, 1998*

# Public Interest

“...is dependent upon officials  
that place the public interest  
ahead of their own...

Equally damaging  
Is the appearance of impropriety.”

*A Call for Ethical Standards: Corruption in Orange County*  
Orange County Grand Jury Report on Ethics, April 2013, p. 1

# Integrity

Independence

Budget &  
political  
constraints

Data  
reliability

Effort invested  
vs  
results derived



“Faithful  
Reporting”  
-Cohn

# Objectivity

“Decisions in the public sector ...



Image: LeeAnn Pelham

will never be easy...but  
are moments of truth,  
in which the public good is  
defined and  
served – or not achieved – in  
specific, concrete circumstances.”

Ralph Heintzman, Values and Ethics  
Canadian Public Service Management Agency

# (Im)Proper Use

- bribery
- influence peddling
- information peddling
- financial transactions & conflicts
- gifts / entertainment / travel
- outside employment
- future employment
- post employment
- confidentiality

# Professional Behavior

## Values      Compliance



aspirations

laws

incentives

consequences

“carrot”

“stick”

“ceiling”

“floor”

# Sure-footed Public Service



Avoiding Conflicts

Avoiding Apparent  
Conflicts of Interests

Assuring Impartiality

# Grey Zone Revisited



What ethics hotspots do I see?

What practical steps might address them?

What processes or systems might strengthen/reinforce areas most vulnerable to an integrity risk?

What assistance might help?

What would progress look like?

...inside every solution  
are the seeds  
of new problems.

No leader enjoys that  
reality, but  
every leader knows it.



*John W. Gardner  
Living, Leading and the American Dream*

# Questions?



*Image:* LeeAnn Pelham

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to advance their mission*