



Bu proje Avrupa Birliđi, Avrupa Konseyi ve  
Türkiye Cumhuriyeti tarafından birlikte finanse edilmektedir.



COUNCIL OF EUROPE  
CONSEIL DE L'EUROPE

Avrupa Konseyi tarafından  
yürütölmektedir.

## CONSOLIDATING ETHICS IN THE PUBLIC SECTOR IN TURKEY (TYEC2)

### TECHNICAL PAPER

#### DEVELOPING ACTION PLANS FOR MINISTRIES TO IMPLEMENT RESEARCH FINDINGS FROM TYEC 1 PROJECT - IDENTIFYING THE KEY PROBLEM AREAS AND RECOMMENDATIONS

Prepared by  
Dr Gary Hickey, TYEC 2 Long Term Advisor  
*March 2013*

ECU-TYEC 2-5/2013



## Table of Contents

Introduction.....	3
Presidency of the Revenues Administration .....	4
Customs .....	6
Health .....	8
Ministry of Interior .....	9
Land Registry .....	12
Police.....	15
Public Procurement .....	16
Professional Associations.....	18
Conflict of Interest.....	18
Ministry of Education .....	19

---

For any additional information please contact:  
Economic Crime Cooperation Unit  
Information Society and Action against Crime Directorate  
Directorate General I - Human Rights and Rule of Law  
Council of Europe  
F-67075 Strasbourg Cedex FRANCE  
Tel +33 388 41 29 76/Fax +33 390 21 56 50  
Email: [lado.lalovic@coe.int](mailto:lado.lalovic@coe.int)  
Web: [www.coe.int/economiccrime](http://www.coe.int/economiccrime)

This document has been produced with the financial assistance of the European Union. The views expressed herein can in no way be taken to reflect the official opinion of the European Union or the Council of Europe.

## **Introduction**

TYEC 1 involved the completion of 10 research studies to develop an understanding of public ethics in Turkey, including drivers and inhibitors of reform within various institutions. TYEC 2 involves the development of action plans for ministries to implement the research findings from this research.

An action plan involves a sequence of steps or activities that must be undertaken to achieve a strategy. It requires the identification of what needs to be done, by when, by whom, and the resources required. This paper is a first step in the development of such action plan. The conclusions and recommendations of each research have been analysed and presented in the form of various tables. The tables for the research sometimes differ due to each research report providing differing levels of detail and presenting recommendations and conclusions in different ways. So, for example, sometimes it is possible to identify specific problem areas along with recommendations, while other times it is not possible to align recommendations directly to a specific problem area.

It is also worth noting that some research reports categorise recommendations in terms of the group of people at whom they are targeted and also that some recommendations are intended for other organisations, for example the Council of Ethics. Others group the recommendations in terms of short, medium and long term. Finally, there are a few language issues which can be overcome by having a Turkish speaking individual who can interpret the original research reports.

## Presidency of the Revenues Administration

### Recommendations to Presidency of the Revenues Administration (PRA)

Problem area	Recommendations
Need to improve PRA staff' views on their occupation	<ul style="list-style-type: none"> <li>- Improve salaries and wages</li> <li>- Improve the fairness of salaries and wages</li> <li>- Greater fairness in promotions and assignments.</li> <li>- Analyse work procedures with a view to reducing workload</li> <li>- Activities to strengthen attachment of PRA personnel to the organisation:               <ul style="list-style-type: none"> <li>- rewards for a job well done</li> <li>- thanking staff for a job well done</li> </ul> </li> <li>- Improve working environment</li> </ul>
Need to improve the image of the PRA	<ul style="list-style-type: none"> <li>- Utilise media</li> </ul>
Too much bureaucracy/red tape	<ul style="list-style-type: none"> <li>- Eliminate regulations forcing PRA staff to act picky on trivial matters</li> <li>- Reduce request from managers that are arbitrary and outside the work's requirements</li> </ul>
Greater publicity for the principles of ethics	<ul style="list-style-type: none"> <li>- Provide information on the principles of ethics</li> <li>- Use the PRA's documents and internet should provide information on the existence of the Ethics Commission n</li> </ul>
A need not to tolerate any misconduct	<ul style="list-style-type: none"> <li>- the organisation should distance itself from any PRA staff engaging in such activities</li> <li>- every instance of misconduct should be investigated</li> <li>- - do not rank the principles of ethical behaviour in terms of seriousness</li> </ul>
Need to utilise technology to combat unethical behaviour	<ul style="list-style-type: none"> <li>- Use technology to:</li> <li>- decrease taxpayers' contacts with PRA personnel</li> <li>- monitor activities of PRA staff</li> </ul>

### Recommendations related to taxpayers

Problem area	Recommendations
Need to change society's views re tax ethics and tax evasion. Some accountants demand discriminatory behaviours from PRA personnel in tax offices.	<ul style="list-style-type: none"> <li>- Educate financial advisers and accountants on the principles of ethical behaviour</li> <li>- Use financial advisers and accountants to educate and direct payers about the ethical principles and their importance</li> </ul>
Need to enhance consciousness of taxpayers re ethics	<ul style="list-style-type: none"> <li>- PRA to launch a campaign(s) reminding taxpayers to comply with the principles of ethical behaviour</li> <li>- Inform taxpayers that requests for discriminatory implementation diminishes service quality and are damaging in the long run</li> </ul>
Need to improve perceptions of tax payers on the ethical behaviour of PRA	<ul style="list-style-type: none"> <li>- PRA to address reasons for these perceptions</li> </ul>
Need for taxpayers to feel welcomed in the local offices of the PRA	<ul style="list-style-type: none"> <li>- Reduce delays in processing documents</li> <li>- Reduce number of steps involved in each task</li> </ul>

### Recommendations for the Council of Ethics

Problem area	Recommendations
The PRA is an organisation that is concerned with effective and compliant financial relationships between citizens and state.	<ul style="list-style-type: none"> <li>- Council of Ethics should encourage PRA to prepare their own principles of ethical behaviour</li> </ul>
PRA personnel need to be educated on the importance of the principles of ethical behaviour	<ul style="list-style-type: none"> <li>- Seminars should be given by the professionals</li> <li>- Different groups of employees face different risks re ethics and so employees should be put into risk groups and receive training tailored to their needs</li> <li>- Training should include the contribution that the ethics principles can make to happiness in life as well as job satisfaction</li> </ul>

## Customs

Problem area	Recommendations
Negative opinion of employees to their professions	<ul style="list-style-type: none"> <li>- Establish a just and adequate pay system</li> <li>- More training for current staff</li> <li>- Recruit more qualified staff</li> <li>- Improve social rights of employees</li> <li>- Improve organisational climate</li> <li>- Improve quality of food, improve travel services</li> <li>- Prizes for personnel exhibiting exemplary ethical behaviours</li> </ul>
Preventing unethical behaviours	<ul style="list-style-type: none"> <li>- Provide training on administrative ethics, vocational ethics and ethical values to all staff</li> </ul>
Erosion of societal values of honesty contributes to corruption	<ul style="list-style-type: none"> <li>- Ethical awareness campaign for the public</li> </ul>
Need to revise institutional structure	<ul style="list-style-type: none"> <li>- Devolution of authority to the lower levels (particularly regional offices)</li> </ul>
Need to improve quality of customs directors	<ul style="list-style-type: none"> <li>- Improvements in selection</li> <li>- Improvements in training</li> <li>- Measures to ensure they have ethical values</li> </ul>
Need to improve public image and develop better relationships with the public and other public organisations	<ul style="list-style-type: none"> <li>- Better communication of the organisational culture and efforts regarding ethical issues</li> <li>- Use service users in these efforts</li> </ul>
Need to improve relationship and image with the public	<ul style="list-style-type: none"> <li>- Regularly inform service users of:</li> <li>- -basic information about custom procedures</li> <li>- how citizens should behave when they face unethical behaviours in custom directorates</li> <li>- the consequences of behaving unethically</li> <li>- how they can do their works without using real custom advisors and other mediators</li> <li>- -comfortable sitting and waiting areas for citizens</li> <li>- Posters about ethical principles on the walls</li> <li>- Address citizens demands and complaints more efficiently</li> <li>- Increase prevalence of security cameras</li> </ul>

<p>The unethical behaviours of some customer advisers negatively impact upon the image of the profession</p>	<ul style="list-style-type: none"> <li>- Standardise the work of customs advisers</li> </ul>
<p>Some unethical behaviours fall outside of Penal Law and disciplinary rules</p>	<ul style="list-style-type: none"> <li>- Ethics Commissions should be more active</li> <li>- Ethics Commissions should have some access to sanctions</li> <li>- Ethics Commissions should have stronger links with the Council of Ethics</li> <li>- Decisions of the Ethics Commissions should be accessible to all staff via the website, published journals and leaflets</li> </ul>
<p>Lengthy custom service procedures lead to service users seeking to accelerate them leading to unethical behaviour</p>	<ul style="list-style-type: none"> <li>- Simplify work procedures, reduce bureaucratic procedures and utilise information technology (eg BILGE and GIMOP)</li> </ul>
<p>Use of new technology can create new kinds of corruption</p>	<ul style="list-style-type: none"> <li>- Address data security issues</li> </ul>
<p>Existing legal framework hinders improvements in efficiency, effectiveness and quality of services and prevention of unethical behaviours</p>	<ul style="list-style-type: none"> <li>- Revise legal framework of custom services in accordance with new developments:</li> <li>- Increase level of punishment for corruption and other unethical behaviour</li> <li>- Revise the 'Circular of Behavioural Codes and Principles of Honesty' in the light of national and international framework and ethical principles</li> </ul>
<p>Need to raise institutional awareness of ethics</p>	<ul style="list-style-type: none"> <li>- More proactive Ethics Commissions</li> </ul>
<p>Under utilisation of internal audit system</p>	<ul style="list-style-type: none"> <li>- Greater role for internal auditors in:</li> <li>- establishing ethical base of custom services</li> <li>- monitoring ethical procedures</li> <li>- seeking ways to improve ethical practices</li> </ul>

## Health

Problem area	Actions
Need for healthcare professionals to support reform initiatives and eliminate unethical mechanisms of income generation	<ul style="list-style-type: none"> <li>- Revise principles for performance-based circulating capital premium payments</li> <li>- Re-evaluate the premium share of non-physician healthcare personnel</li> <li>- Eliminate all sorts of monetary contact and relationship between the physician and patient</li> <li>- Physicians working full-time for public healthcare institutions must receive retirement payments</li> <li>- Senior management of hospitals must be held accountable through regulation</li> </ul>
Need to control the influence the pharmaceutical industry has over healthcare services and professions	<ul style="list-style-type: none"> <li>- Ministry of Health to work with Turkish Medical Association and the Turkish Union of Pharmaceutical Employers etc to develop solutions</li> </ul>
Lack of control over media organisations' attitude toward issues of public health and use of healthcare services	<ul style="list-style-type: none"> <li>- Create a Supreme Board of Medical Journalism, with status and in cooperation with the Ministry of Health and the Radio and Television Supreme Council</li> </ul>
Patients buy that part of the medicine or medical materials which is reimbursed by public payers	<ul style="list-style-type: none"> <li>- The physician, manager of the healthcare institution and manager of the company selling medical materials to the patient must be held accountable</li> <li>- Medicine and medical materials transactions to be monitored by the Social Security Institution and Ministry of Health</li> </ul>
Some physicians encourage excessive use of analyses, tests, and medical procedures	<ul style="list-style-type: none"> <li>- Responsibility for supervision of such physicians should be with medical practice and Ethics Committees at employing institutions</li> <li>- Specialty societies to prepare clinical guidelines in their respective fields</li> <li>- Ministry of Health and Social Security Institution must create a set up so that services are provided within the framework of evidence-based practice and good clinical practices</li> </ul>

Incidents of malpractice	<ul style="list-style-type: none"> <li>- Ministry of Health, Turkish Medical Association and medical specialty societies to make joint efforts to evaluate and prepare standards</li> </ul>
Heavy workload for nurses and this is not reflected in their salary	<ul style="list-style-type: none"> <li>- Studies to understand impact of physicians' overtime working on quality of services</li> <li>- A workload and ergonomics assessment for physicians</li> </ul>

## Ministry of Interior

### General recommendations

Recommendations
Provide customer tailored training for bureaucrats and technocrats.
Downsize units of state to simplify bureaucratic processes and create a more competitive service environment.
Consider improving financial conditions of government employees.
Embed the concepts of public interest and auditing in public administration and education.
Increase the level of transparency and accountability.
Establish an independent and well-organised control mechanism to examine and evaluate whether plans serve the public interest.
Establish a clear definition of 'public interest' and the principles of urbanism and planning.
Council of Ethics should undertake work to establish the causes of unethical behaviour. The findings should inform ethics training
Greater efforts must be made to develop ethics measuring instruments
Analyse British planning practices to identify lessons regarding the establishment of 'watch groups' for effective inspection and/or appeals. See Chris Booth (2006).

### More specific recommendations

Problem areas	Recommendations
Planning system <ul style="list-style-type: none"> <li>- Insufficient and inflexible planning system</li> <li>- Duplication of planning authorities and major conflicts among them. Land-owners and constructors tendency toward short-cuts, bribing and illegal ways for building permits and planning changes</li> <li>- Inadequacy of urban areas for changing conditions and needs, especially inside the living areas.</li> </ul>	<ul style="list-style-type: none"> <li>- Apply a more flexible planning system, open to bargaining with people and companies that ask for planned land</li> <li>- Review the professional system of planners with a view to removing or lessening the ladders of planners</li> <li>- Update all plans and complete cadastral plans and so reduce conflicts between plans and cadastral plans</li> <li>- Review planning processes to make them clear and</li> </ul>

<p>Lack of empty spots inside the city among buildings for unforeseen needs for planned land</p> <ul style="list-style-type: none"> <li>- rapid urbanisation due to migration from rural areas to big cities</li> </ul> <p>Planning profession</p> <ul style="list-style-type: none"> <li>- Monopolist structure related to professional card/ladder system in planning profession</li> <li>- Effectiveness of constructors in planning decisions related to the existing development structure</li> <li>- Changing role and structure of planning profession (planners) from main public interest and public service to a profession working in a competitive environment and liberal democracy</li> <li>- Undervaluing the technical issues against liberal market conditions</li> <li>- Decrease in planning alteration demands due to lack of planning revisions in some settlements</li> <li>- Misperception that planners are only technical staff in planning process</li> </ul> <p>Conflicting interests and pressures</p> <ul style="list-style-type: none"> <li>- Inadequacy of tools for managing conflicts among various interests and actors in planning decision-making and plan applications at the local level</li> <li>- Perception of planning as one of the main tools to legalise illegal and/or problematic buildings, lands and developments</li> <li>- Law exemptions for illegal developments just before local elections. Condoning illegal constructions for gaining votes in elections</li> <li>- Contractors' and land-owners' pressures on planning decisions which are against the interests of society</li> <li>- Entrepreneurs' and capital owners' pressure on land development</li> <li>- Land mafias seeking advantage from illegal developments and</li> </ul>	<p>understandable</p> <ul style="list-style-type: none"> <li>- Disadvantaged and poor people should be informed and educated about their rights on planning</li> <li>- Civil organisations involved with planning at the local level should be strengthened and encouraged to participate in planning processes</li> <li>- Reduce planners' irresponsibility against principles of the planning process</li> <li>- Reduce pressure caused by high rent by producing more planned land with infrastructure</li> <li>- Raise awareness of planners, advisers and politicians of the moral duality of society and individual moral weaknesses which impact on planning issues</li> <li>- The government's approach for changing the planning decisions of previous administrations and the lack of legal arrangements for these changes</li> <li>- Undertake a study, with the participation of academia, planners and policy makers, with a view to reduce the duplication in planning among governmental units (especially between local and central government)</li> <li>- Reduce the number of authorised units in planning and simplify procedures</li> <li>- Make ethical education and training part of formal education for primary schools and universities. Integrate ethics topics into various classes and courses in education</li> <li>- Develop ways to ensure a fairer distribution of development rent in society</li> </ul>
--	--

<p>increases in planning rights through plan alterations</p> <ul style="list-style-type: none"> <li>- Conflicts due to planning being carried out which is influenced by political interests</li> <li>- Administrators acting as a representative/member of their political party in the planning decision-making process</li> </ul> <p>Administrative issues</p> <ul style="list-style-type: none"> <li>- Administrators do not act in a neutral manner</li> <li>- Lack of awareness of of cultural heritage and environmental andconservation values</li> <li>- Authority weakness in conservation land values against rent</li> <li>- Pressure on planners to make decisions which are contradictory to planning principles</li> <li>- Tendency toward corruption and illegality</li> <li>- Raising the degeneration in public administration and planning</li> <li>- Rent, competitiveness in sharing the big piece of the cake in urban rents</li> </ul> <p>Inadequacy of measures and tools</p> <ul style="list-style-type: none"> <li>- Lack of taxation in rent gained by planning decisions</li> <li>- Lack of legal arrangements for the distribution of rent gained by planning decisions</li> </ul> <p>Corruption and decay in moral values</p> <ul style="list-style-type: none"> <li>- Conflicting interests of citizens and/or companies</li> <li>- Decay in local government</li> <li>- Condoning illegal construction on public lands</li> <li>- Insufficient institutionalisation of planning profession</li> <li>- Systematic problems of planning</li> <li>- Planners' and planning decision makers' own economic, political and personal concerns</li> <li>- Lack of personal morals</li> <li>- Legal gaps, existence of uncertain</li> </ul>	
--	--

<p>articles in planning acts, contradictions in planning acts</p> <p>Public participation</p> <ul style="list-style-type: none"> <li>- Insufficient public participation in planning process</li> <li>- Obscurity of the 'public interest' concept, hardness of definition and determination of public interest in many cases</li> <li>- Undervaluing the public interest in planning process</li> <li>- Lack of detailed decisions in planning law for providing public interest</li> </ul>	
--	--

## Land Registry

### Human Resource Development and Reorganisation

Problem area	Recommendations
Pay system unjust and inadequate	<ul style="list-style-type: none"> <li>- Adequate pay structure (including a link between pay and performance)</li> </ul>
Need for restructuring of TKGM	<ul style="list-style-type: none"> <li>- Make TKGM an autonomous organisation or devolve more authority to lower levels</li> </ul>
Inadequate balance between service units in terms of personnel and workload	<ul style="list-style-type: none"> <li>- A human resource planning and reorganisation project to determine duties, standardisation of work titles, optimise the hierarchical structure, and address imbalances in staffing levels between service units</li> </ul>
Need to increase skills and qualities of staff	<ul style="list-style-type: none"> <li>- Train current staff</li> <li>- Recruit more qualified staff</li> <li>- Revise title and cadastral affairs schools – 4 years, increase capacities and appoint their graduates to newly established title experts positions</li> </ul>
Increase morale and motivation	<ul style="list-style-type: none"> <li>- Improve social rights of employees</li> <li>- Improve organisational climate</li> <li>- Improve quality of food</li> <li>- Improve quality of travel services</li> <li>- Introduce a competition for personnel of the month</li> </ul>

	<ul style="list-style-type: none"> <li>- Staff time off for weddings/birthdays</li> <li>- Prizes for good ethical behaviour</li> </ul>
Preventing unethical behaviours	<ul style="list-style-type: none"> <li>- Training on administrative ethics, vocational ethics and ethical values</li> </ul>

### **Developing relationships with the public and other organisations**

Problem area	Recommendations
Need to change positively the image of the organisation to the media, citizens and other organisations	<ul style="list-style-type: none"> <li>- Use citizens to promote and communicate organisational culture to the media (particularly ethics)</li> <li>- Establish comfortable sitting and waiting areas for citizens</li> <li>- Publicise ethics principles on the walls of the service units</li> <li>- Establish an institutional identity for Land Registry</li> <li>- Deal efficiently and thoroughly with citizen demands and complaints</li> <li>-</li> <li>- Increase prevalence of security cameras</li> <li>- Regularly inform service users of: <ul style="list-style-type: none"> <li>-basic information about procedures</li> <li>- how citizens should behave when they face unethical behaviours in title service units</li> <li>- the consequences of behaving unethically</li> <li>- how they can do title works without using real estate agents and other mediators</li> </ul> </li> <li>- Engage in public relations activities</li> </ul>
Need to remove feelings of TKGM personnel that they have a lack of protection and that they are not valued by Government	<ul style="list-style-type: none"> <li>- Develop inter-organisational and intra-organisational relations and ties with : <ul style="list-style-type: none"> <li>- Prime Minister</li> <li>- Council of Ministers</li> <li>- Individual ministers</li> <li>- The undersecretary</li> <li>- Vice-undersecretaries</li> </ul> </li> </ul>

### **Restructuring the real estate sector**

Problem area	Recommendations
The profession of real estate agencies is not sufficiently standardised or disciplined	<ul style="list-style-type: none"> <li>- Enact draft law</li> </ul>
Need to decrease workload in title service units and divide responsibility in	<ul style="list-style-type: none"> <li>- Make mediators in title services official</li> </ul>

title services among shareholders	<ul style="list-style-type: none"> <li>- Make real estate agents directly responsible for their actions by making TAKBIS system accessible for real estate agents</li> </ul>
-----------------------------------	--

### Revising the legal framework

Problem area	Recommendations
Slow process with title service managers and employees having to check every document in detail	<ul style="list-style-type: none"> <li>- Introduce a vocational insurance system</li> </ul>
Need to discourage unethical and corrupt behaviour	<ul style="list-style-type: none"> <li>- Increase level of punishments for corruption and other unethical behaviours</li> </ul>

### Utilising information technology

Problem area	Recommendations
Need to accelerate title services and decrease chances of non-ethical behaviours	<ul style="list-style-type: none"> <li>- Increase use of TAKBIS</li> <li>- Make data security a priority</li> <li>- Develop a data share system between public organisations to facilitate information sharing</li> <li>- Have a cashier's office in each title service unit or a mechanisms for on-line money payment</li> <li>- Develop agreement with banks so that a buyer can deposit money and the manger of the title service can open the system and authorise money transfer once contract signed</li> </ul>

### Improving work processes

Problem area	Recommendations
Lengthy and complicated work processes provide opportunities for unethical behaviour	<ul style="list-style-type: none"> <li>- Reduce bureaucratic procedure</li> <li>- Utilise information technology</li> </ul>

### Increasing role and functions of the internal audit unit

Problem area	Recommendations
Opportunity for internal auditors to play a greater role in ensuring high ethical standards	<ul style="list-style-type: none"> <li>- Internal auditors monitor ethical procedures</li> <li>- Internal auditors seek ways to improve ethical practices</li> </ul>

### Increasing functions of Ethics Commissions

Problem area	Recommendations
--------------	-----------------

Ethics Commissions have no role in investigating unethical behaviour or applying sanctions	<ul style="list-style-type: none"> <li>- Empower Ethics Commissions to inspect allegations of violations of ethical principles and apply sanctions</li> <li>- Publish decisions of investigations and sanctions on website</li> </ul>
--	---

## Police

Problem area	Recommendations
Traffic police officer faces daily temptations regarding gifts and bribes	<ul style="list-style-type: none"> <li>- Improve supervision of traffic police officers</li> </ul>
Ethical training in service and pre-service is inadequate and not adapted to the needs of police officers serving in traffic divisions	<ul style="list-style-type: none"> <li>- Improve ethics training (including use of films taken from real life stories)</li> <li>- Civilian, professor and uniformed instructors who teach 'police ethics' should receive regular and updated training</li> <li>- Update current ethics curriculum and include scenarios from real life</li> <li>- Following general ethics training there is a need for in-service follow up and refresher training for police tailored to specific requirements of departments and units</li> </ul>
Maintain integrity and promote ethical awareness amongst police officers	<ul style="list-style-type: none"> <li>- Short movies</li> <li>- Posters, brochures and leaflets promoting ethical awareness can be displayed in police stations and public places</li> </ul>
Seasoned officers can have a corruptive effect on newly appointed officers	<ul style="list-style-type: none"> <li>- Supervising officers should closely monitor these relationships</li> </ul>
Inadequate departmental control on police corruption	<ul style="list-style-type: none"> <li>- Develop systematic departmental control mechanisms</li> <li>- Introduce an 'integrity testing system' that will test the integrity of police officers</li> </ul>
Sub governors (the primary civilian authority over the police department) are not effective	<ul style="list-style-type: none"> <li>- Increase capacity (of sub governors via, for example, more staff and/or training)</li> </ul>
High level managers need to be role models and show leadership regarding ethics	NO SPECIFIC RECOMMENDATION
Public not sufficiently educated about ethics	<p>Raise public awareness via:</p> <ul style="list-style-type: none"> <li>- short movies</li> <li>- posters, brochures and leaflets promoting ethical awareness can</li> </ul>

	be displayed in police stations and public places
Habitual soliciting of private business owners for maintenance of police vehicles, buildings, papers, printer inks etc	<ul style="list-style-type: none"> <li>- Central government and local agencies should meet all maintenance costs of police divisions and units</li> <li>- Ban the receiving of material or cash for the police organisation</li> </ul>

## Public Procurement

The Public Procurement Authority (PPA) should play the main role in terms of preparing legislative proposals, guidelines and training models.

## General recommendations

Recommendations
The Government should, as much as possible, remove the economic possessions of public bodies via privatisation. The State should place a regulatory and supervisory role when a sector is being privatised so that unethical practices are not simply shifted from the public to private sectors.
The Government should ensure that honest directors are employed and promoted and corrupt ones are punished. Public administration reforms should aim to foster professionalism and impartiality and include capacity and career development, job security and remuneration policy. The reforms should also establish clear and effective administrative procedures, harmonious standards across public administrations, and tools to control and review actions of individual public servants to ensure their accountability.

## Pre-bidding phase

Recommendations
Training in statutes, regulations, directives and various regulating laws.
PPA to make the legal arrangements which would require obtaining the necessary analysis from and the approval regarding the priority of the need of an independent authority
Increase effectiveness of the PPA and the Audit Court (Turkish Court of Accounts) with regard to the legal inspection of the decisions taken by the public administrations in relation to public biddings
Develop projects which would enable the objective determination of costs
Change legal position to enable the publicising of the names of those behaving unethically
Increase transparency in, for example, the preparation and publicity of the specifications
Digitalise the process of bidding and the documents involved in the bidding process
Ensure the competence criterion in bidding documents is not open to interpretation. Consider not making the criteria so strict so as to make bidding difficult.
Standardise contracting documents as much as possible.
Revise the Public Procurement Law No. 4734

Adhere to spirit of Public Procurement Law No. 4734. The procedure of open bidding and the procedure of bidding by certain contractors should be the default contracting procedures. Other contracting procedures should only be used in special circumstances as specified in law.

Possessions owned by public bodies should be registered conventionally and electronically.

Inventory should be supervised regularly by external supervisors.

## Bidding phase

Recommendations
Use electronic devices more often.
Establish a database whereby documents and the conclusion of the job can be seen via an allocated number.
Make each stage of biddings as transparent as possible.
More punitive sanctions should be applied to civil servants who behave illegally.
Increase effectiveness of judicial mechanisms for dealing with contractors who collude prior to bidding.
Simplify the contracting process. Eg removal of unnecessary certification, permitting and licensing regulations, anti-corruption screening of new legislation aimed at limiting discretionary powers, increasing officials' accountability.
Provide supervision during processes prior to and after the constitution of the contract.
Digital registering of all contracting works to increase conformity to the principles of transparency and accountability.
Measures which encourage more contractors to bid. <ul style="list-style-type: none"> <li>- More accurately determine the approximate costs</li> <li>- Include upper and lower limits in the approximate costs</li> </ul>
When there are no well-equipped employees to evaluate bids, assistance should be obtained by independent bodies

## Post-bidding phase

Recommendations
Introduce internal inspection and effective supervision.
More punitive sanctions for, and more frequent application of those sanctions on, those persons who accept work which does not conform to the administrative and technical specifications.
For contracting projects carried out by ETKB, independent inspection firms, with increased obligations and responsibilities, should take part
Job definitions and time limits in the phases of the preparation and conduct of payment, acceptance and inspection should be reorganised.
Professional chambers would have a role in the process of acceptance.
Employ a sufficient number of experienced inspectors when work is being carried out.
Involve the public in the process of inspection

## Professional Associations

Problem areas
Concern about impartiality and sincerity of Council of Ethics People who are elected determine which issues are important and there is too much reliance on these people. Whistle blowing on malpractices is difficult to attain Whistleblowers are not adequately protected Laws alone will not lead to people becoming more ethical Implicit institutionalisation re ethics is more important than explicit institutionalisation Lack of clarity about the extent to which the Council of Ethics covers Professional Associations Lack of clarity about the structure and aims of the Council of Ethics

Recommendations
No distinction made between elected and appointed persons in professional organisations
Ethical consciousness to be developed in the family and at the beginning of primary school
Ethics to be institutionalised implicitly and become part of that person
Definitions and duties of members of the Council of Ethics to be clearly drawn
Organisational initiatives to eliminate favouritism and discrimination in promotions and appointments

## Conflict of Interest

Problem areas
Organisational culture has deteriorated Personnel regime including merit system and pay is unfair and ineffective New public management reforms including public procurement system cause ethical dilemmas in transparency and accountability Confidence in public service is low due to lack of sufficient transparency and accountability Relevant legislation is too dispersed Preventative measures are insufficient Public awareness and control is limited Need for an autonomous body to monitor, investigate and report to the public

## Short term recommendations

Recommendations
<ul style="list-style-type: none"><li>- An ethics training programme linked to revised chapters 2 and 3 of the Regulation, stressing the following objectives:</li><li>- public servants are required to abide by all legislation, including the</li></ul>

<p>Constitution</p> <ul style="list-style-type: none"> <li>- serve the public and put the public interest first</li> <li>- execute the policies of the government of the day, regardless of individual political affiliations</li> <li>- promote sound, efficient, effective, transparent and accountable administration</li> </ul>
<ul style="list-style-type: none"> <li>- Case studies, to assist interpretation of the principles of ethical behaviour, should be regularly published and distributed to civil servants</li> </ul>
<ul style="list-style-type: none"> <li>- Appoint an ethics champion in each ministry or province</li> <li>- Establish a contact person in each provincial ethics commission to address civil servants' questions</li> <li>- Establish a toll free hotline</li> </ul>
<ul style="list-style-type: none"> <li>- Update Law No. 5176</li> <li>- Harmonise other relevant laws and regulations</li> </ul>
<ul style="list-style-type: none"> <li>- Enact a general conflict of interest regulation. Other sectors should be encouraged to develop their own conflict of interest mechanisms.</li> </ul>
<ul style="list-style-type: none"> <li>- Enact a political/finance law</li> </ul>
<ul style="list-style-type: none"> <li>- Regulate, either as a code or law, Parliamentary Ethics and Judicial Ethics</li> </ul>
<ul style="list-style-type: none"> <li>- Make the public procurement process more competitive and transparent</li> <li>-</li> </ul>
<ul style="list-style-type: none"> <li>- The top executives need to make a clear statement that they support ethical behaviour</li> </ul>

### Medium term recommendations

<ul style="list-style-type: none"> <li>- Parliament should enact a whistle blowing mechanism to enable civil servants to report unethical behaviours and illegal activities</li> </ul>
<ul style="list-style-type: none"> <li>- Reduce the discretion of public authorities in those areas which may lead to a conflict of interest</li> </ul>
<ul style="list-style-type: none"> <li>- Reorganise the Council of Ethics for Public Employees so that it can adequately fulfil its functions</li> <li>- Readopt the Ombudsman law to enable the examination of conflict of interest situations</li> </ul>

### Long term recommendations

<ul style="list-style-type: none"> <li>- Develop a strategic plan with the input from all relevant stakeholders including public, business, non-governmental organisations and the media</li> </ul>
---

### Ministry of Education

Problem area	Recommendations
The institutional structure of the state	- Public services and public benefit

needs to be reorganised	<p>should be redefined</p> <ul style="list-style-type: none"> <li>- The state should not have the position of employer</li> <li>- Accountability and transparency mechanisms should be established</li> <li>- Service processes should be redefined and state employees should stop regarding themselves as superior to citizens</li> <li>- public relation education should be given to change the negative attitude of civil servants to citizens</li> </ul>
Regulations are applied top down and so practitioners and citizens are not fully aware of the processes	<ul style="list-style-type: none"> <li>- Education programmes, for practitioners and citizens, on the regulations</li> <li>- - case studies should be used from countries with a low corruption rate in Transparency International's Corruption Perception Index</li> <li>- It should be made clear to citizens which state employees are responsible for a service so that that citizens can hold them to account</li> <li>- The code for state employees should include new articles on ethical principles and sanctions for breaching the principles should be increased</li> <li>- It should be possible to make an allegation of misconduct on the internet of institutions</li> <li>- Ethics Commissions and public organisations should be able to publicise condemnations of inappropriate behaviours</li> </ul>
Lack of society trust in organisations	<ul style="list-style-type: none"> <li>- Allegations of breaches of the Code of Conduct should be made public via the media and internet sites</li> <li>- The results of allegations should, where necessary, be followed up via legal mechanisms and the outcomes announced through the media and internet sites.</li> </ul>
Education policies that emphasise	<ul style="list-style-type: none"> <li>- The relationship between the</li> </ul>

<p>meaningful learning and information should be encouraged and supported</p>	<p>school and family should be strengthened by training parents on ethical principles</p> <ul style="list-style-type: none"> <li>- Ethical principles should be included in some courses in the school curriculum</li> <li>- When teaching ethical principles there should be some case studies as well as theory</li> <li>- Public officials should be invited to teach on courses to provide students with information on the responsibilities of public organisations</li> <li>- There should be periodic evaluation of these suggested activities</li> <li>- In terms of priorities, particular attention should be given to those cities and age groups where adherence to the ethical principles is low</li> </ul>
<p>Need to ensure the media and civil society organisations play a positive role in promoting ethics</p>	<ul style="list-style-type: none"> <li>- Ethical principles should be included in the regulation of these organisations</li> <li>- There should be legal regulations encouraging competition and preventing the monopolisation of the media</li> <li>- There should be measures that encourage civil society organisations to be effective and enable them to act as pressure groups</li> <li>- Introduce severe sanctions against political rant and gaining advantage in relations with media, NGOs and pressure groups</li> <li>- In order to increase the role of the media and civil society in promoting ethics, the Council of Ethics should make arrangements to ensure that these institutions are informed about ethics issues</li> </ul>

### Conclusion

The next stage will be for the short term experts, along with the various ministries, to:

- determine what template or templates they wish to use for developing their action plans;
- identify which recommendations have already been addressed, can't be addressed or are now obsolete;
- break down many of the recommendations into more specific tasks;

- identify those measures which would enable a conclusion to be made about the extent to which a recommendation has been addressed;
- identify the individuals within the various ministries with whom it would be most appropriate to engage when developing a full action plan.