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Article

Public integrity as a comprehensive multi-level policy framework and the study of the Brazilian case

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This study proposes an understanding of public integrity as a comprehensive and multi-level framework for public policy, develops analytical schemes to examine and compare international standards and integrity systems, and explores the Brazilian case to illustrate its application. Grounded in policy diffusion and convergence theories, the study adopts an exploratory and qualitative research design, employing content analysis and documentary techniques. Documentary data were collected between June 2023 and December 2024 through web-scraping strategies and Freedom of Information (FOI) requests, resulting in a corpus of 69 documents produced between 2011 and 2023. This corpus provides evidence regarding the sources, foundations, and justifications for the rules, structures, and measures of the Brazilian integrity system. The findings suggest a fragmentation of public integrity in the country, ambiguities in national norms and guidelines concerning high-risk sectors, processes, and state-owned enterprises, unclear definitions of integrity violations, and a predominance of the compliance-based approach. In addition to presenting a new conceptualization of public integrity and analytical schemes, the study offers insights and discussions from the Brazilian case that may support comparative and in-depth research, strengthening the scientific debate and the formulation and implementation of public integrity systems.

Keywords: public integrity, anti-corruption, policy framework, OECD, Brazil.

A integridade pública como um *framework* abrangente e multinível de políticas públicas e o estudo do caso brasileiro

Este estudo propõe uma compreensão da integridade pública como um *framework* abrangente e multinível para políticas públicas, desenvolve esquemas analíticos para examinar e comparar normas internacionais e sistemas de integridade e explora o caso brasileiro para ilustrar sua aplicação. O estudo fundamenta-se nas teorias de difusão

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e convergência de políticas públicas e adota um desenho de pesquisa exploratório e qualitativo, com análise de conteúdo e técnicas documentais. Os dados documentais foram recolhidos entre junho de 2023 e dezembro de 2024 por meio de estratégias de varreduras na *web* e pedidos de acesso à informação, resultando em um *corpus* composto por 69 documentos produzidos entre 2011 e 2023, contendo evidências sobre as fontes, os fundamentos e as justificativas das regras, estruturas e medidas do sistema integridade no Brasil. Os achados sugerem a fragmentação da integridade pública no país, ambiguidades nas normas e orientações nacionais relativas a setores e processos de alto risco e a empresas estatais, definições pouco claras de violações de integridade e a predominância da abordagem baseada em conformidade. Além de apresentar uma nova compreensão da integridade pública, esquemas analíticos, bem como achados e discussões resultantes da análise do caso brasileiro, as contribuições deste estudo podem oferecer subsídios para estudos comparativos e aprofundados que fortaleçam o debate científico e a formulação e implementação de sistemas de integridade pública.
Palavras-chave: integridade pública, anticorrupção, *framework* de políticas públicas, OCDE, Brasil.

La integridad pública como un *framework* amplio y multinivel de políticas públicas y el estudio del caso brasileño

Este estudio propone una comprensión de la integridad pública como un marco (*framework*) integral y multinivel para las políticas públicas, desarrolla esquemas analíticos para examinar y comparar normas internacionales y sistemas de integridad, y explora el caso brasileño para ilustrar su aplicación. El estudio se fundamenta en las teorías de difusión y convergencia de políticas públicas y adopta un diseño de investigación exploratorio y cualitativo, con análisis de contenido y técnicas documentales. Los datos documentales fueron recopilados entre junio de 2023 y diciembre de 2024 mediante estrategias de rastreo sistemático en la web y solicitudes de acceso a la información, resultando en un corpus de 69 documentos producidos entre 2011 y 2023 que contienen evidencias sobre las fuentes, fundamentos y justificaciones de las reglas, estructuras y medidas del sistema de integridad en Brasil. Los hallazgos sugieren la fragmentación de la integridad pública en el país, ambigüedades en las normas y orientaciones nacionales relativas a sectores y procesos de alto riesgo y a empresas estatales, definiciones poco claras de las violaciones de integridad y el predominio del enfoque basado en el cumplimiento. Además de presentar una nueva comprensión de la integridad pública y esquemas analíticos, las contribuciones de este estudio ofrecen insumos para investigaciones comparativas y profundas que fortalezcan el debate científico y la formulación e implementación de sistemas de integridad pública.
Palabras clave: integridad pública, anticorrupción, *framework* de políticas públicas, OCDE, Brasil.

1. INTRODUCTION

Public integrity has emerged as a relevant topic since the rise of good governance and has been promoted as an indispensable anti-corruption agenda by homogenous and cross-referenced prescriptions, among whose main providers are the Organization for Economic Co-operation and Development (OECD), Transparency International (TI), and the United Nations Office on Drugs and Crime (UNODC), (D'Alterio, 2017; Heywood & Kirby, 2020; Huberts, 2018; Oliveira et al., 2024; Scapin, 2016).

The literature commonly identifies public integrity as a set of standards for two types of policies, indicating that the balance in the implementation between them is a central issue. One focuses on compliance-based components to create external incentives for the rule of law, founded on control and rule-enforcement approaches. The other is related to ethical culture-based components to manage the institutional culture and the system of beliefs, oriented by behavioral and values-based approaches (D'Alterio, 2017; Heywood, 2012; Perlman et al., 2023; Roberts, 2023).

Despite the above-mentioned homogeneity of prescriptions, different studies have suggested that national integrity systems in diverse countries have shown mismatches with such prescriptions on which they were based, as well as overlaps, gaps, and soft spots (Demmke et al., 2023; Heywood, 2012; Heywood & Kirby, 2020; Menzel, 2015; Oliveira et al., 2024; Scapin, 2016). In addition, there are indications that the understanding of public integrity that emerges from these prescriptions and resulting systems has been marked by strong appeal, imprecision, and broadness, which represent

characteristics of a "magical concept" that Pollitt and Hupe (2011) proposed in their study on the conceptualization of (good) governance (Heywood & Kirby, 2020; Oliveira et al., 2024).

Based on the analysis of international standards, this study assumes that public integrity constitutes a comprehensive framework composed of the following descriptive parts: the scope of application, the establishment of intervention units, the definition of integrity violations, and integrity-related components. This last part includes the compliance-based and ethical culture-based components mentioned, as well as a third type of systematization-based components for harmonizing and coordinating the implementation of these first two, as proposed here. Additionally, this study also assumes the framework is multi-level, as it is addressed to upper and lower levels of government (OECD, 2017, 2020; TI, 2011; UNODC, 2011, 2019).

This study's objective is to propose an understanding of public integrity as a comprehensive multi-level policy framework, develops analytical schemes for examining and comparing international standards and integrity systems, and to explore the Brazilian case to illustrate their application. This case was chosen for two reasons. First, because integrity and other anti-corruption-related policies in Brazil have emerged from convergence with international standards (Da Ros & Taylor, 2022; Oliveira, 2019; Vieira, 2023; Viol, 2021). Second, there is evidence of a strong scandal culture and power feedback that benefit anti-corruption actors in this country that have led to corruption-fighting policies with overlaps, gaps, and soft spots, representing mismatches to the standards on which they were based (Da Ros & Taylor, 2022; Oliveira & Caeiro, 2025; Oliveira & Monteiro, 2024).

This study draws on a theoretical approach to institutional analysis that treats policy diffusion and convergence as products of isomorphic forces based on the legitimacy of dominant ideas, structures, and practices that impose a certain logic of appropriateness (DiMaggio & Powell, 1991; Marsh & Sharman, 2009). Assuming that convergence processes are shaped by agency-structure tensions between international norms and domestic institutions, mediated by key actors' preferences and beliefs, even policy systems resulting from isomorphism will present ambiguities and mismatches to their sources (Mahoney & Thelen, 2010; Marsh & Sharman, 2009).

Here, an exploratory and qualitative case study research design based on a content analysis with documentary techniques is adopted (Bardin, 2013; Cellard, 1997; Gerring & Cojocaru, 2016). Documentary data on the Brazilian government's convergence to public integrity were gathered from web-based strategies and requests for information conducted between June 2023 and December 2024. Preliminary results indicated that OECD standards served as the primary source of public integrity policies in Brazil and that, in this country, political branches at different levels of government established independent integrity systems, with no evidence of institutional arrangements to coordinate them. Furthermore, among these systems, the one related to the Federal Executive Branch was the only one with sufficient information about its formulation and implementation, which is the reason why this study adopted it as a case study.

The final corpus comprises 69 documents produced between June 2010 and December 2023, containing evidence on the sources, fundamentals, and justifications of the rules, structures, and measures within the Brazilian integrity system. It compiles international standards and assessments (7), domestic norms (16), guidance manuals (11), documentation on the formulation of these regulations (22), and publications (13) in the press and on government websites related to the case study[1].

[1] The list of these documents is available at https://zenodo.org/records/19582555

The case study's findings indicated diverse mismatches with OECD public integrity standards. The findings on the first descriptive part point to a limited scope that, combined with evidence from other public integrity systems and the absence of even minimal coordination or inter-branch pact-making, as exists in other policy systems in this country, suggests fragmentation. Regarding the other parts, the findings pointed to ambiguities in domestic norms and guidance for high-risk sectors and processes, as well as for state-owned enterprises (SOEs), which also constitute units of intervention for public integrity under OECD standards. In addition, there are indications of blurred definitions of integrity violations that can increase the risk of lenient or overly punitive uses of integrity, which Huberts (2018, p. 27) defines as integritism, and an imbalance in implementation with the predominance of compliance-based components over ethical culture-based components, defined here as compliancism.

This study's contributions are primarily directed at efforts to design and improve integrity systems, future studies of other cases of governments' convergence towards public integrity, and the literature on governance, anti-corruption, and integrity in the public sector. The first contribution is a new understanding of public integrity as a comprehensive multi-level framework that comprises three types of prescriptions for integrity-related components at upper and lower levels. The second is the development of new analytical schemes to examine and compare public integrity frameworks and integrity systems in different countries. The third contribution related to the Brazilian case is that its findings and lessons may inform policymaking, inspire further in-depth and comparative research, and promote a more qualified debate on the possibilities and challenges of the public integrity agenda.

This paper is organized into six sections. The first one proposes a new approach to public integrity as a comprehensive multi-level policy framework, enabling analytical schemes for examinations and comparisons. The following outlines the theoretical foundations for exploring the convergence of governments toward international integrity standards. The third presents the research design for applying these schemes to the case study, including the methods, steps, and results of document gathering and selection. The last three present the findings of such an application, discussions, and contributions to the scientific agenda, as well as to policymaking and implementation of integrity systems.

2. PUBLIC INTEGRITY AS A POLICY FRAMEWORK

Public Integrity became a prominent topic with the rise of the good governance standards promoted by international actors, such as the World Bank and the International Monetary Fund in the late 1990s. Promoted as a response to corruption scandals that eroded trust in governments, increasing concerns about public institutions' functioning, public officials' conduct, and interactions at the boundary between the state and private business, public integrity came to be regarded as an indispensable anti-corruption agenda (Bowler & Karp, 2004; Heywood, 2012; Ian & Ting, 2015; Scapin, 2016).

Assuming that public integrity represents a new paradigm for fighting corruption in the public sector, its influence has materialized in a global diffusion of national systems worldwide based on a policy framework comprising cross-referenced prescriptions with considerable homogeneity, provided by inter-governmental and non-governmental organizations, among which the OECD, TI, and UNODC are the most prominent (D'Alterio, 2017; Heywood & Kirby, 2020; Huberts, 2014a).

Such a framework comprises a series of standards for designing, implementing, and monitoring diverse integrity-related components to be adopted by diverse units of intervention in the public

sector, which include public bodies, SOEs, and high-risk government sectors (such as health and infrastructure) and processes (such as public procurement and lobbying). This scope of application should reach all political branches and levels of government (OECD, 2017, 2019, 2020; TI, 2011; UNODC, 2011, 2019).

Although public integrity is primarily justified by the need to respond to corruption systematically, its prescriptions include other integrity violations. Therefore, integrity frameworks aim to prevent, detect, and punish a broad range of unethical conduct and forms of maladministration, such as fraud, conflict of interest, misuse of insider information, theft and waste of resources, abuse and misuse of power and insider information, manipulation and misinformation, intimidation, discrimination, and misconduct in one's private life (Heywood & Kirby, 2020; Huberts, 2018).

The literature typically distinguishes two types of integrity-related components to tackle integrity violations. One focuses on compliance-based structures and measures to create and impose external incentives for the rule of law, grounded in control and rule-enforcement approaches. The other is related to ethical culture-based components to manage the institutional culture and the system of beliefs, oriented by behavioral and values-based approaches (D'Alterio, 2017; Heywood, 2012; Perlman et al., 2023; Roberts, 2023).

However, international standards and national integrity systems reveal a third type that the literature has barely explored, representing the first general issue for this study. It corresponds to prescriptions for components that allow the harmonization and coordination of others, which allow the public integrity framework to function as a set of prescriptions for systematizing anti-corruption measures.

At the upper level, systematization-based prescriptions (even those founded on international prescriptions) concern domestic rules and guidance that harmonize the formulation, implementation, and monitoring of lower-level components across organizations, sectors, and processes, making broad coordination possible. At the low-lever, prescriptions for systematization-based components focus on coordinating the formulation, implementation, and monitoring of compliance- and ethical culture-based components in each organization or high-risk sectors and processes, always oriented by upper-level regulations, standards, and guidance (OECD, 2017, 2020; TI, 2011; UNODC, 2011, 2019).

This study's first proposal is that the public integrity framework can be portrayed as a set of prescriptions for structures, mechanisms, and initiatives related to systematization-, compliance-, and ethical culture-based components at upper and lower levels, as the Analytical Scheme of Integrity-Related Components in Table 1.

TABLE 1 ANALYTICAL SCHEME OF INTEGRITY-RELATED COMPONENTS IN PUBLIC INTEGRITY FRAMEWORKS

	Systematization-based components	Compliance-based components	Ethical culture-based components
Upper Level	Arrangements and initiatives to harmonize, coordinate, and assess public organizations' integrity-related components, such as national authorities, implementation networks, risk measurement guidance, assessment patterns, indicators, and monitoring procedures.	Legislation, codes, institutional structures, and guidance for right-to-information, judiciary independence, lobbying transparency, risk management standards, auditing, scrutiny in legislative, money laundering, conflicts of interest, investigations, sanctions, etc.	National regulations, comprehensive programs, and general guidance for promoting leadership, merit-based policies, and capacity building in civil service for integrity, as well as for fostering business ethics and whole-of-society engagement.
Low Level	Mechanisms for designing, implementing, and monitoring compliance- and ethical culture-based policies within each public organization, following upper-level structures and measures.	Public organizations' policies related to codes of conduct, transparency, ombudsman's activities and whistleblowing protection, conflict of interest prevention, audit proceedings, risk management, disciplinary investigations and sanctioning, and others.	Public organizations' policies promote a culture of integrity based on leadership, merit, and engagement through communication, advising, training, and social participation strategies and initiatives.

Source: Elaborated by the authors from the analysis of (OECD, 2017, 2020; TI, 2011; UNODC, 2011, 2019).

From a new observation on the scheme proposed in Table 1, a second general issue for this study that remains under-explored by the literature derives from the first one. Public integrity frameworks presume a comprehensive scope, reinforcing such a multi-level perspective. International standards propose that national systems should not be limited to executive branches, central governments, or federal spheres. Assuming corruption practices are perpetrated through deficits or deficiencies in controls and institutions between different political branches and levels of government, prescriptions recommend regulations and structures for integrity-related components of the wide range of executive, legislative, and judiciary processes and bodies in national and subnational governments (OECD, 2017, 2020; TI, 2011; UNODC, 2011, 2019).

Despite the above-mentioned homogeneity of international prescriptions, in-depth and comparative studies have suggested that integrity systems adopted in different countries show mismatches with the very prescriptions on which they were based, as well as overlaps, deficits, and soft spots (Demmke et al., 2023; Heywood, 2012; Heywood & Kirby, 2020; Menzel, 2015; Oliveira et al., 2024; Scapin, 2016). Although public integrity has become a virtually unquestioned agenda, its diffusion and prescriptions have been marked by strong appeal, imprecision, and broadness (Heywood & Kirby, 2020; Oliveira et al., 2024), which represent the same "magical characteristics" of (good)

governance proposed by (Pollitt & Hupe, 2011). These characteristics may be leading the convergence processes of national governments toward the public integrity agenda in some countries, including in Brazil, to reproduce the reductionism of the assimilation of good governance, as its *mater* concept, which can increase risks of lenient or overly punitive uses of integrity-related components, known as 'integritism', (Caldeira et al., 2022; Grin, 2023; Huberts, 2018; Oliveira et al., 2024).

In order to examine and compare public integrity international standards and the national systems resulting from them, this study's second proposal outlines another analytical scheme that considers more than the integrity-related components in Table 1, but all the descriptive parts mentioned above: the scope of application, the intervention units, the range of integrity violations, and systematization-, compliance-, and ethical culture-based components at upper and lower levels. In the fourth section, Table 2 presents this proposal as an Analytical Scheme for Public Integrity Frameworks and Systems applied to analyze the OECD framework. In the following one, Table 3 shows a second application of such a scheme for examining the Brazilian system, comparing it with this framework, underscoring possible mismatches.

3. THEORETICAL PROPOSAL FOR THE CASE STUDY

This study argues that the Brazilian government's convergence towards public integrity represents a fruitful experience that can contribute to policymaking on integrity processes, developing other in-depth and comparative studies, and a more qualified debate on the possibilities and challenges of the public integrity agenda. Some theoretical and empirical points support this argument.

In Brazil, current anti-corruption policies, mostly based on international standards, emerged from gradual changes initiated by the democratization in the mid-1980s (Alencar et al., 2025; Da Ros & Taylor, 2022; Oliveira, 2019; Vieira, 2023; Viol, 2021). Nevertheless, studies on corruption and anti-corruption in this country link this situation to a culture of scandal that generates positive feedback effects that empower anti-corruption key actors and significant ambiguities in the anti-corruption institutional domain, resulting in incentives for strategies oriented towards power and reputation that amplify overlaps, gaps, and soft spots in this domain (Grin, 2023; Da Ros & Taylor, 2022; Oliveira & Caeiro, 2025; Oliveira & Monteiro, 2024).

This study draws on a theoretical proposal for institutional analysis based on policy diffusion and convergence processes as results of isomorphic forces based on the legitimacy of dominant ideas, structures, and practices that impose a certain logic of appropriateness (DiMaggio & Powell, 1991; Marsh & Sharman, 2009). As this study explores the adoption of public integrity standards by the Brazilian government, it assumes that this process represented a convergence that took place legitimized by the appeal of defining integrity as the absence of corruption, a framing that reinforced the sense of urgency for adopting these standards to guarantee the rule of law as an unquestionable ideal of good governance (D'Alterio, 2017; Heywood & Kirby, 2020; Huberts, 2014b).

However, multiple factors permeate convergence processes linked to the natural tensions between international norms and domestic institutions mediated by key actors' preferences and beliefs, as influenced by internal political and institutional contexts (Mahoney & Thelen, 2010; Marsh & Sharman, 2009). In this manner, even policy systems resulting from policy convergence based on emulation by isomorphism will reproduce the agency-structure dichotomy combined with these tensions, generating mismatches between sources and resulting policies.

Therefore, despite the logic of appropriateness of policy diffusion and convergence and the above-mentioned homogeneity among public integrity standards of the most notable international providers, it is also remarkable that the arrangements and instruments of diverse countries' national public integrity systems present different shapes and levels of implementation (Heywood, 2012; Kerkhoff & Overeem, 2020; Prateeppornnarong, 2021; Viol, 2021).

4. RESEARCH DESIGN FOR THE BRAZILIAN CASE

This study adopts an exploratory and qualitative case study research design based on content analysis with documentary techniques (Bardin, 2013; Cellard, 1997; Gerring & Cojocaru, 2016). Documents and information on the paths and results of the Brazilian government's convergence to the public integrity agenda were gathered from web-based strategies and requests for information through the Brazilian official access-to-information system, available at CGU (Controladoria Geral da União [CGU], 2025a).

Considering this study's objective and theoretical proposal, it was defined that the *corpus* should be constituted by documents likely to contain information on international prescriptions or assessments that influenced the design of the Brazilian system and domestic norms and guidance that resulted from them, as well as the documentation on formulation processes of these regulations and publications in the press or on government websites about these processes. These documents should provide evidence of sources, fundamentals, and justifications of the rules, structures, and measures within the Brazilian integrity system. Documentary data were gathered from web-based strategies and requests for information conducted between June 2023 and December 2024. The first three web-based searches were performed to define the time period and the sources of the documents likely to contain this evidence.

The first search used a sentence associating terms related to Brazil and public integrity. Documents and information obtained indicated that governmental, intergovernmental, and non-governmental organizations' websites and free press publications refer to only one public integrity system in Brazil, restricted to the Federal Executive Branch. The second search targeted terms related to public integrity in the judiciary and legislative branches, excluding the executive. It indicated that the *Conselho Nacional de Justiça* (CNJ) had recently created a specific integrity system for the judiciary. Still, no information on its respective implementation was found. On the legislative side, the search yielded no indication of an integrity system.

Finally, the last search looked for terms related to public integrity combined with the diverse types of formal regulations in Brazil. Its results indicated that the Brazilian Federal Executive has never sent any bill, and the National Congress never approved any complementary or ordinary legislation specifically on a public integrity system. There were references in legislation only mentioning some integrity-related components and prerogatives, as in the case of the Anti-Corruption Act (Lei nº 12.846, 2013), State-Owned Enterprises Act (Lei nº 13.303, 2016), Public Procurement Act (Lei nº 14.133, 2021), and Federal Executive Branch Organization Act (Lei nº 14.600, 2023). The only rules related to integrity systems for the public sector were in presidential decrees and ministerial ordinances, which are limited to the Federal Executive Branch, as well as a few regulations enacted by CNJ and some subnational governments.

From these three searches, it was possible to establish that documents that should constitute this study's corpus were those produced between June 2010 and December 2023. In this first year, the Brazilian government made the first efforts to materialize an integrity assessment of its anti-corruption mechanisms, conducted by the OECD. The last year of this scope is when the current regulation on the integrity system of the Federal Executive Branch was published, as well as when the Federal government formalized a maturity assessment model with guidelines for implementing integrity programs by public bodies.

Therefore, the continuity of data gathering and subsequent analysis was restricted to the public integrity system of the Federal Executive Branch, considering all its descriptive components, including integrity-related components at the upper and lower levels. Before examining the selected case in depth, it was essential to identify the key actors of the federal executive integrity system. The results of the searches mentioned above underscore the remarkable role of the Office of the Comptroller General at the CGU in promoting the public integrity agenda within executive bodies. Studies on corruption-fighting and public integrity in Brazil confirm this role, as the CGU serves as the anti-corruption agency of the Federal Executive Branch and the central body of its public integrity system, known by the acronym SITAI (Da Ros & Taylor, 2022; Oliveira et al., 2024; Spinelli & Teixeira, 2024; Vieira, 2023; Viol, 2021).

Following this, it was necessary to perform a new search using the CGU website's internal engine, which found news articles and other pieces of content associated with public integrity. These results indicated two relevant areas on this website. The first one is related to official news, which provides information on decisions, measures, regulations, and results on public integrity, available at CGU (2025b). The second is a public-integrity page containing regulations, guidance, a risk-management guide, a maturity assessment model, assessment mechanisms, monitoring dashboards, and a list of institutionalized programs of all executive bodies, available at CGU (2025c). By examining public integrity-related content on the CGU website, it was possible to indicate eight principal regulations in the path of the federal executive integrity system, presented in the next section.

Since information on sources, fundamentals, and justifications of regulations is not available through active transparency in Brazil, 13 requests for information on their formulation processes were sent to the ministries identified as their proponents. A preliminary reading of responses and public-integrity content on the CGU website identified a lack of information on some measures, efforts, and structures mentioned by the official news. Additionally, there was insufficient information on the formulation processes of three regulations. As such, nine new requests were sent to CGU. A second floating reading of the new responses confirmed that the data-collection process had already yielded sufficient information for this study's purpose.

The study's corpus comprises 69 documents, gathered and selected from the first three web-based searches, search and navigation on the CGU's website, and requests for information. They include international standards and assessments (7), domestic norms (16), guidance manuals (11), documentation on the formulation of these regulations (22), and publications in the press and on government websites (13) related to the integrity system of the Federal Executive Branch[2].

[2] The list of these documents, most of which are written in Brazilian Portuguese, is available at https://zenodo.org/records/19582555

5. PATHS AND RESULTS OF THE BRAZILIAN SYSTEM

As indicated in previous sections, although Brazil represents a relevant case study whose analysis can be fruitful for debating and understanding the convergence of other governments towards public integrity, it does not have an integrity system that reaches all political branches and levels of government. As such, this analysis focused on the integrity system of the Federal Executive Branch because, among others, it was the system best suited to this study's purpose. This, more than a limitation, indicates that public integrity in Brazil is fragmented across political branches and subnational governments. That fragmentation is itself a central finding, as it represents a significant mismatch with international standards.

As previously mentioned, the path of public integrity in the Brazilian Federal Executive Branch has eight regulations as its legal milestones: (1) CGU Ordinance No. 784, of April 28, 2016; (2) Joint Normative Instruction MP/CGU No. 01, of May 10, 2016; (3) CGU Ordinance No. 1,827, of August 23, 2017; (4) Decree No. 9,203, of November 22, 2017; (5) CGU Ordinance No. 1,089, of April 25, 2018; (6) CGU Ordinance No. 57, of January 4, 2019; (7) Decree No. 10,756, of July 27, 2021; (8) Decree No. 11,529, of May 16, 2023 (Decreto nº 9.203, 2017; Decreto nº 10.756, 2021; Decreto nº 11.529, 2023; Instrução Normativa Conjunta MP/CGU nº 01, 2016; Portaria CGU nº 784, 2016; Portaria CGU nº 1,827, 2017; Portaria CGU nº 1,089, 2018; Portaria CGU nº 57, 2019).

The content analysis of documents about the formulation processes of these regulations and publications on the CGU website and the press indicated the predominant presence of OECD prescriptions as the primary source of the federal executive integrity system. This conclusion rests on four points. First, the frequency of references to OECD recommendations and guidance as justification bases in formulation processes. Second, because of the similarity of SITAI with the OECD framework. Third, because of evidence of the participation of CGU representatives in OECD public integrity forums, especially in 'Senior Public Integrity Officials' (SPIO) meetings. Fourth, CGU hired OECD consultants to evaluate the federal executive system, and their results were used to justify these regulations.

Because of these findings, not only were OECD prescriptions on public integrity included as primary data, but also technical documentation and methodologies of assessment tools. Thus, from the data gathered, selected, and examined, it was possible to present the analysis of the OECD public integrity framework based on the Analytical Scheme for Public Integrity Frameworks and Systems proposed in the first section, as shown in Table 2.

TABLE 2 ANALYTICAL SCHEME OF THE OECD PUBLIC INTEGRITY FRAMEWORK

Descriptive Parts	OECD Prescriptions
Scope of application	Integrity systems should reach all legislative, judiciary, and executive bodies, including SOEs, high-risk sectors, such as health and infrastructure, and processes, such as public-private partnerships, public procurement, lobbying, and political financing at national and subnational levels of government. They must also promote engagement in the public integrity agenda of the 'whole of society,' which comprises the private sector and civil society organizations in their contact with public administration (OECD, 2017, pp. 3 and 6; OECD, 2020, pp. 49 and 56).
Intervention units	The primary intervention units in an integrity system are public organizations. However, specific strategies or adapted integrity risk management should be adopted for SOEs and high-risk sectors and processes (OECD, 2020, pp. 151-170; OECD, 2022, 2024).
Integrity violations	Integrity violations represent "more than the act of bribery, [including] influence trading, embezzlement of public property, use of confidential information and the abuse of power [and other practices] harmful to society." (OECD, 2017, p. 3). OECD publications indicate that integrity violations include behaviors and practices such as nepotism, patronage, favoritism, clientelism, and absenteeism; deviations related to revolving door and post-public employment, gifts, benefits, hospitality, conflicts of interest, and abuse of insider information; influence trading; misuse or abuse of power; omissions and obstructions of justice; discrimination and retaliation against whistleblowers; active or passive bribery; money laundering and concealment of property from corruption; fraud in general, especially in public procurement; financial mismanagement; embezzlement, misappropriation, or another diversion of public property (OECD, 2020, pp. 22, 45, 49, 65, 66, 105, and 143; OECD, 2024).
Systematization-based integrity-related components at the upper level	Integrity systems should comprise institutional arrangements defining central responsibilities and measures for developing, implementing, supporting, and monitoring public organizations' policies with horizontal and vertical cooperation mechanisms, allowing the development of benchmarks and indicators and gathering of credible and relevant data. They must adopt an evidence-based strategic approach with an integrity risk analysis that prioritizes and balances other components to keep the coherence and comprehensiveness of the whole system.
Compliance-based integrity-related components at the upper level	Integrity systems should be supported by legislation and standards that consider integrity violations as criminal and disciplinary practices and guarantee the independence and efficiency of the judiciary and scrutiny of lobbying. Such systems must comprise standards, procedures, frameworks, and guidance for risk management, auditing, investigating, sanctioning, and preventing conflicts of interest, gifts, and hospitality and promote watchdogging, transparency, participation, and openness.
Ethical culture-based integrity-related components at the upper level	Integrity systems should be supported by legislation and frameworks that reinforce exemplary personal behavior of the highest political and management levels, demonstrating a high standard of propriety in the discharge of top official duties (tone-of-the-top). These systems should establish minimum requirements for adhering to ethical values, establishing merit-based and capacity-building and leadership civil service systems, and creating an open culture that promotes and rewards learning and good governance at the organizational level. They should also count on strategies and mechanisms to guarantee the communication and guidance on integrity values and standards in each public organization and externally to the private sector, civil society, and individuals in their interactions with public officials.

(Continue)

Descriptive Parts	OECD Prescriptions
Systematization-based integrity-related components at lower levels	Public organizations must adopt structures that count on responsibilities and instruments for designing, leading, implementing, and monitoring their respective integrity functions. Organizations should also adopt risk management based on the upper-level framework for identifying, analyzing, and treating their respective integrity risks.
Compliance-based integrity-related components at lower levels	Public organizations must adopt: • An internal control and risk management framework based on an environment of control with clear objectives and a strategic approach to risk management and control mechanisms. • Enforcement mechanisms for detecting, investigating, and sanctioning, combining disciplinary, administrative, civil, and/or criminal processes, with cooperation and exchange of information and transparency within public sector organizations. • External oversight and control, facilitating and learning, providing responses to sanctions, rulings, and formal advice. • Mechanisms to ensure that oversight bodies reinforce public integrity and are responsible for information on suspected wrongdoings or misconduct. • Instruments to promote transparency, open government, access to information, and open data, granting all stakeholders access to design and implementing public policies. • Initiatives to avert interest group capture through managing conflicts of interest and instilling transparency in lobbying and financing political parties and election campaigns. • Measures to facilitate the participation of society, including "watchdog" organizations, citizen groups, labor unions, and independent media.
Ethical culture-based integrity-related components at lower levels	Public organizations must adopt: • Instruments for engaging stakeholders in the development, updating, and implementation of public integrity policies and for carrying out campaigns for the private sector and civil society. • Initiatives to promote integrity leadership in recruitment and selection, as well as appointment, promotion, and performance assessment. • Mechanisms for supporting and training managers to act as ethical leaders and to develop frameworks for identifying and mitigating public integrity risks. • Efforts to adopt merit-based and professional HR management founded on fair and open recruitment, selection, and promotion based on objective criteria and formal procedures. • Instruments to provide sufficient and up-to-date information, training, guidance, and timely advice to public officials. • Initiatives to support an open organizational culture with open discussion on ethical dilemmas, integrity concerns, and errors.

Notes: In the area of the OECD website dedicated to 'anti-corruption and integrity,' available at OECD (2025), there are other publications on specific subjects of public integrity, such as lobbying, public procurement, and SOEs. However, as the primary OECD standards on public integrity in the corpus already include the basic prescriptions of these publications, they were not used in this analysis.

Source: Elaborated by the authors, adapted from OECD (2017, 2020, 2022, 2024).

The analysis of the OECD framework made it possible to identify its prescriptions in the different descriptive parts. Note that the primary content used as documentary data on OECD standards, presented in Table 2, included, firstly, the OECD Recommendations on Public Integrity and the OECD

Public Integrity Handbook (OECD, 2017, 2020), since these were the most frequent references in documents on the formulation of processes of federal executive integrity regulations.

Table 2 also used information on criteria and parameters of the OECD Public Integrity Indicators project to assess national public integrity systems (OECD, 2022, 2024), considering news on the CGU website and responses to requests for information that pointed out the participation of CGU representatives in this project. This analysis also considered other technical content available on the specific area of the CGU website dedicated to public integrity-related themes. Finally, note that OECD prescriptions and mechanisms on public integrity represent an ongoing project. In this manner, tangential and emerging topics, such as fighting disinformation, were not considered in this study because of the silence about them in the formulation processes of integrity regulations.

The analysis of OECD prescriptions presented in Table 2 made it possible to compare them with the federal executive integrity system, underlining differences in each descriptive part. Table 3 presents this second analysis based on the SITAI regulation by Decree No. 11,529 (Decreto nº 11.529, 2023) and CGU ordinances and guidance, showing the resulting mismatches with the OECD framework.

TABLE 3 ANALYSIS SCHEME OF SITAI AND RESULTING MISMATCHES WITH THE OECD FRAMEWORK

Descriptive Parts	SITAI Regulation in Decree No. 11,529 (2023) and CGU Ordinances and Guidance	Mismatches to OECD Prescriptions in Table 2
Scope of application	Bodies and public entities of the Federal Executive Branch (Decreto nº 11.529, 2023, art. 2º). Comment #1: As indicated in the previous section, there is evidence of integrity systems related to the judiciary and some subnational governments, but no information was found that such systems share or are harmonized through common upper-level systematization-based structures and measures. Comment #2: There is evidence of a program called *Time Brasil*, within the scope of the CGU's actions related to the Open Government partnership, that foresees state and municipal governments receiving assistance from the CGU in policies related to transparency and integrity. This program depends on the voluntary participation of these subnational governments. It implies some level of coordination from the CGU, but only for support and guidance purposes (CGU Normative Ordinance No. 6, of March 24, 2022).	SITAI has a reduced scope, which does not reach other political branches and levels of government.

(Continue)

Descriptive Parts	SITAI Regulation in Decree No. 11,529 (2023) and CGU Ordinances and Guidance	Mismatches to OECD Prescriptions in Table 2
Intervention units	The primary intervention units are the public executive bodies and entities (Decreto nº 11.529, 2023, art. 2º). These public organizations must create a 'sectorial unit' to formulate, coordinate, and monitor their respective integrity programs, which organizes their integrity-related components (Decreto nº 11.529, 2023, art. 3º). Comment #1: In Brazil, the State-Owned Enterprises Act establishes that SOEs must adopt some integrity-related components. Although the CGU also has responsibilities for promoting corporate integrity, these organizations have remained ambiguous regarding the scope of the federal executive integrity system. In addition, the only formal CGU integrity guidance for SOE found for this study was published before the State-Owned Enterprises Act. Comment #2: In Brazil, the Public Procurement Act and the Decree on Public Agenda of Authorities establish several duties related to integrity in procurement and meetings that can involve lobbying activities. However, in general, there is insufficient information on CGU standards for high-risk sectors or processes that integrate them into the public integrity system, allowing better coordination and monitoring.	SOEs have ambiguous positioning within the integrity system, followed by an insufficient and out-of-date CGU guidance. There are relevant ambiguities and gaps in standards for high-risk sectors, such as health or infrastructure, and processes, such as public procurement and lobbying.
Integrity violations	Corruption, fraud, irregularities, unlawful acts, and other ethical and conduct deviations, violations, or disrespect for rights, values, and principles that impact trust, credibility, and institutional reputation (Decreto nº 11.529, 2023, art. 3º, inciso I)	There is a relevant ambiguity in the range of violations to be prevented, detected, and punished by integrity-related components.

(Continue)

Descriptive Parts	SITAI Regulation in Decree No. 11,529 (2023) and CGU Ordinances and Guidance	Mismatches to OECD Prescriptions in Table 2
Systematization-based integrity-related components at the upper level	Establishment of CGU as the central Federal Executive body with competencies to: I – establish general rules and procedures; II - guide activities related to integrity risk management; III - provide technical supervision to sectorial units; V - monitor and evaluate the performance of sectorial units; VII - inform to sectorial units of facts or situations that may compromise their integrity programs and recommend the adoption of the necessary remediation measures (Decreto nº 11.529, 2023, art. 7º) Comment: There is CGU guidance on risk management, but it is outdated in relation to the current list of integrity violations. No guidance or information from CGU for public integrity was found about the identification and analysis of diverse areas, processes, or sectors, or indications on possible uses of risk information provided by other bodies, such as the Federal Public Administration High-Risk List, published by the *Tribunal de Contas da União* (TCU, 2024).	There is a lack of information on risk identification and analysis in the whole system, as well as insufficient and outdated standards and guidance on risk-based approach management to public organizations.
Compliance-based integrity-related components at the upper level	Act No.14,600 delegates CGU prerogatives as the central body of ombudspersons' activities, internal control and auditing, transparency and freedom of information, public ethics, disciplinary, and corporate integrity promotion. Comment #1: Such roles allow it to perform competencies for compliance-based integrity-related policies at the upper level, including promoting efforts to adapt or strengthen legislation. Comment #2: CGU has the prerogatives of a supervisory body for the implementation of the Anti-Corruption Law (Lei nº 12.846, 2013) in the Federal Executive Branch, since, in addition to initiating and conducting proceedings to investigate and sanction private entities that commit harmful acts and entering into leniency agreements, it can take over these proceedings initiated by other public bodies and entities when it is necessary to examine their regularity or correct their progress. Comment #3: In the last case of public ethics, the central body's roles are shared by CGU and the Public Ethics Commission, as indicated by Oliveira & Caeiro (2025).	No significant mismatches.

(Continue)

Descriptive Parts	SITAI Regulation in Decree No. 11,529 (2023) and CGU Ordinances and Guidance	Mismatches to OECD Prescriptions in Table 2
Ethical culture-based integrity-related components at the upper level	CGU has competencies to coordinate and carry out joint ethical-cultural or compliance activities: IV - coordinate activities that require joint actions of sectorial units, and VI - carry out communication and training actions related to integrity issues (Decreto nº 11.529, 2023, art. 7º). Comment: There is no information on this central body's competencies and strategies to promote integrity standards by improving legislation and administrative systems related to HR management (primarily focused on recruitment, training, merit-based promotion, and leadership), social engagement, and public communication. Despite this shortcoming, the CGU website has diverse publications on guidance for ethical culture-based functions.	There is a significant lack of formal competencies to strengthen legislation and administrative systems associated with ethical culture-based policies at the upper level.
Systematization-based integrity-related components at lower levels	Establishment of sectorial units within public organizations to: I - advise authorities of the body or entity on matters related to integrity; II - liaise with the other units of the body or entity that performs integrity functions; III - coordinate the structuring, execution and monitoring of its integrity programs; IV - promote, in coordination with the areas responsible for integrity functions, guidance and training on matters related to the integrity program; V - prepare and periodically review the integrity plan; VI - coordinate the management of risks to integrity; VII - monitor and evaluate the implementation of the measures established in the integrity plan; VIII - propose actions and measures based on the information and data related to the management of the integrity program; IX - evaluate the actions and measures related to the integrity program suggested by the other units of the body or entity; X - report to the highest authority of the body or entity information on the performance of the integrity program and report any facts that may compromise institutional integrity; XI - participate in activities that require the execution of joint actions of the member units; XII - report to the central body the situations that compromise the integrity program and adopt the necessary measures for their remediation (Decreto nº 11.529, 2023, art. 8º). Comment: CGU standards and guidance on its website present diverse guidelines to sectorial units, and its maturity evaluation model comprises several Key Process Area assessments on this topic.	No significant mismatches.

(Continue)

Descriptive Parts	SITAI Regulation in Decree No. 11,529 (2023) and CGU Ordinances and Guidance	Mismatches to OECD Prescriptions in Table 2
Compliance-based integrity-related components at lower levels	Although sectorial units have only one prerogative related to a nominated compliance-based function, CGU standards and guidance on its website present diverse guidelines, and its maturity evaluation model comprises several Key Process Area assessments on this topic. Comment #1: As indicated as systematization-based integrity-related components at the upper level, the CGU is also the central body of administrative systems in the Executive Federal Branch associated with these policies. Comment #2: Public bodies and entities have prerogative, under the Anti-Corruption Law (Lei nº 12.846, 2013), to initiate and conduct investigation and sanction proceedings against private entities that commit acts harmful to public administration, and CGU guidance designates this as an internal-affairs function in integrity programs, representing a link between public and private integrity.	No significant mismatches.
Ethical culture-based integrity-related components at lower levels	Sectorial units have only one prerogative to promote guidance and training on the integrity program in coordination with the areas responsible for integrity functions (Art. 8, IV). Comment: CGU guidance on its website presents insufficient guidelines to sectorial units on such topics.	There are insufficient prerogatives and standards on ethical culture-based components at low levels.

Source: Elaborated by the authors from SITAI Regulation in Decree No. 11,529 (Decreto nº 11.529, 2023), CGU Ordinances and Guidance, and information in previous studies and diverse legislation in the corpus.

6. ISSUES AND DISCUSSIONS OF FINDINGS

The case study's findings pointed to diverse mismatches with the OECD framework as its primary source, as shown in Table 3. As indicated, the analysis was limited to the Federal Executive Branch because it is the only political branch in Brazil with an integrity system that fits this study's purpose. The first mismatch corresponds directly to the reduced scope of application of the federal executive integrity system, which does not reach other federal political branches and levels of government. This finding becomes more significant when considered alongside evidence on the existence of other integrity systems related to the judiciary and some subnational governments.

While a certain level of fragmentation is indeed expected in Brazil due to its constitutional design—marked by autonomy across government levels and independence among political branches —this institutional arrangement does not necessarily preclude the existence of coordinated policy systems. In fact, Brazil has implemented different national policy systems that rely on intergovernmental coordination and inter-branch pact-making, demonstrating that some level of coordination is both institutionally feasible and politically achievable. Notable examples include the Unified Health System (in Portuguese, *Sistema Único de Saúde*, SUS) and the National System of Conservation Units (in

Portuguese, *Sistema Nacional de Unidades de Conservação*, SNUC). Drawing on Hall and Soskice (2001) notion of institutional complementarities, it is plausible to argue that if coordination mechanisms in specific policy domains enhance their results and institutional efficiency, the establishment of these mechanisms within the integrity domain can lead its related policies to reach such improvements —even in a federal, institutionally fragmented context like Brazil.

Another relevant and intriguing finding that did not result from the descriptive parts in Table 3 is that presidential decrees and CGU ordinances are the only federal executive integrity system regulations. It indicates a low level of co-production and little coordination with initiatives of the *Tribunal de Contas da União* (TCU) or *Ministério Público da União* (MPU), which also represent key actors in the web of anti-corruption institutions (Da Ros & Taylor, 2022; Oliveira, 2019). Furthermore, such regulations were not subject to scrutiny by elected representatives in parliament, which weakens their legitimacy and stability since unilateral mid-level decisions can change or revoke them without social participation or legislative-executive checks and balances.

The adoption of legislative measures that legitimize the integrity system for addressing the issues mentioned in the previous paragraph can also reduce the above-indicated fragmentation. These measures could include a constitutional amendment granting the Union the power to enact national legislation on integrity, as already occurs in the cases of public procurement and personal data protection, and an ordinary act to establish some degree of intergovernmental coordination and interbranch pact-making among public-integrity institutions, as in the case of the SUS and SNUC. Since 2023, the Brazilian government has promoted a significant debate on administrative reform, with a particular emphasis on integrity and anti-corruption, making this an opportune moment for such measures.

The *first issue for discussing the Brazilian case* is associated with these two previous findings. The Brazilian constitutional system provides greater independence between political branches and levels of government, which requires broad consensus and significant compromise to establish arrangements that imply the sharing of power, the creation of duties, and the possibility of new multi-level controls and monitoring. In addition, as suggested by studies on governance and fighting corruption in Brazil, positive feedback of power and reputation for anti-corruption 'protagonists' can lead to disputes for the 'monopoly' of integrity-related components, which makes it even more challenging to reach a consensus that would allow the creation of a comprehensive and harmonious coordination.

The *second relevant issue for discussing the Brazilian case* emerges from the findings on the range of integrity violations. SITAI defines an ambiguous set of practices and behaviors to be prevented, detected, and punished within sectorial units' integrity programs. Even though the OECD standards also bring some soft spots, the delegation to each public organization to define, in their own integrity programs, which forms of conduct may be punished as possible "deviations, violations or disrespect for rights, values, and principles that impact trust, credibility, and institutional reputation" can imply some risk of integritism, as a lenient or overly punitive use of integrity (Huberts, 2018, p. 27).

The *third issue related to the Brazilian case* comes from the comparison of mismatches between compliance-based and ethical culture-based components. Findings indicate insufficient standards allowing harmonization, coordination, and monitoring of ethical culture-based components at both levels. The Federal Executive Branch relies on several administrative systems to guide and supervise activities among bodies associated with these components, such as HR management, social engagement, and public communication, whose central bodies are different ministries from the CGU.

As such, harmonizing and coordinating these administrative systems with the federal executive integrity system depends to some extent on voluntary cooperation among different central bodies rather than on a more institutionalized arrangement.

On the other hand, upper-level compliance-based components can be coordinated with other administrative systems, in which the CGU is the central body. Such an accumulation of central roles of diverse systems allows this body, which is at the same time the public integrity central body, to perform competencies for most compliance-based integrity-related components at the upper level, including promoting efforts to adapt or strengthen legislation.

Therefore, comparing the upper-level compliance-based and ethical culture-based components indicates the possibility of imbalances between them at lower levels. It can imply a higher focus of the CGU and the whole system on compliance functions, leading to better results in their associated policies. This situation may lead the CGU to devote less attention to provide standards and guidance for ethical culture-based integrity functions at a lower level. It is possible to infer that this compliancism, proposed here as the predominance of compliance-based approaches and practices that result in a overly punitive and reactive orientation of integrity systems, can represent a reflection of the reductionism in the assimilation of governance and anti-corruption-related concepts and prescriptions in Brazil, mentioned in the theoretical proposal (Caldeira et al., 2022; Oliveira et al., 2024).

The *last issue from the Brazilian case* is derived from the first and third issues. Despite the indicated higher adherence of compliance-based upper-level components to the OECD framework, from the findings, it is possible to infer that this resulted more from the agency-structure dichotomy than from strategic decisions to design a better integrity system. This indication refers to the fact that the CGU proposed and led (sometimes monopolizing) the formulation of these regulations, increasing its power and reinforcing its role as the central body of different administrative systems associated with compliance.

Notably, the ambiguous positioning of SOEs, the insufficient information on risk identification in areas, sectors, or processes, as well as on standards and guidance for a risk-based approach, and the lack of integrity regulations on high-risk topics are linked to subjects in which authority for coordination is under the responsibility of other ministries. Therefore, Brazil's federal executive integrity system has fewer mismatches to the OECD framework in those parts under the CGU's power as the central body of the Federal Executive Branch for compliance-based anti-corruption policies. On the other hand, such a system presents more mismatches in parts or components that depend on other political branches, subnational governments, or even other central executive bodies.

However, such an inference that this concentration of the formulation of integrity regulations can result from the agency-structure dichotomy, which may yield greater gains in power and reputation for key actors, can be broken down into a complementary explanation. Considering that, until the conclusion of this study, the Federal Executive Branch has not sent any bill to the National Congress about this topic, it is possible also to infer that the need for a broad consensus to create an extensive integrity system in Brazil, together with the urgency to present anti-corruption innovations, may explain the limited scope of the federal executive system and the fragmentation of public integrity in this country between different political branches at the federal and subnational levels of government.

7. CONTRIBUTIONS

This study's contributions include a new understanding of public integrity, analytical schemes for examining and comparing international standards and integrity systems, and findings and discussions on the Brazilian case. They primarily speak to policymaking on integrity, future studies of other cases of governments' convergence towards public integrity, and the literature on governance, anti-corruption, and integrity in the public sector.

A panoramic view of scientific studies on public integrity and the standards of its most influential providers indicates that the literature still tends to treat it as a set of prescriptions for formulating, implementing, and monitoring compliance-based and ethical culture-based integrity policies. As such, the first contribution of this study refers to the proposal that public integrity represents a policy framework divided into descriptive parts, from which it highlights the systematization-based components that confer on integrity a 'systematic' character, which seems obvious but demands accurate comprehension by researchers, policymakers, and practitioners.

This study's second contribution is associated with the assumption that public integrity, as a comprehensive multi-level framework, should be approached as a set of integrity-related prescriptions for components at upper and lower levels. This contribution, combined with the previous one, allowed the proposal of the Analytical Scheme of Integrity-Related Components presented in Table 1. The second proposal extends this approach by incorporating the other descriptive parts (scope of application, units of intervention, and integrity violations), making it possible to present the Analytical Scheme for Public Integrity Frameworks and Systems as a result of its application for the analysis of the OECD Framework, in Table 2, and the Brazilian federal executive integrity system, in Table 3.

The third contribution comes from the possibility that the Brazilian case reflects more than an isolated experience. Given the homogeneity between the prescriptions and the fact that Brazil has institutional arrangements and has adopted reform agendas and anti-corruption policies along similar lines to other countries, it is possible to infer that the challenges faced by this country in its convergence towards public integrity occur worldwide.

It is hoped that the findings and discussions on this study's case may be helpful for policymaking on integrity processes and future in-depth and comparative studies of other cases of governments' convergence towards public integrity. In addition, learning from them may allow for a more profound debate on the possibilities and limitations of the public integrity agenda and anti-corruption policies. Moreover, such debate may also include connections between integrity and corruption-fighting in the public sector and business ethics, leniency agreements, and integrity in the private sector, which, in Brazil, are primarily addressed in the recent Anti-Corruption Law (Lei nº 12.846, 2013).

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Temístocles Murilo de Oliveira Júnior: Conceptualization (Lead); Formal analysis (Lead); Investigation (Lead); Methodology (Equal); Writing – original draft (Lead); Writing – review & editing (Equal).

Joaquim Croca Caeiro: Funding acquisition (Lead); Methodology (Equal); Validation (Lead); Writing – review & editing (Equal).

RESEARCH DATA AVAILABILITY

The entire dataset supporting the results of this study has been made available at the Zenodo open-access repository and can be accessed at https://zenodo.org/records/19582555.

CONFLICT OF INTEREST

The authors have no conflicts of interest to declare.

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