Customs Integrity Perception Survey
Methodological Guidelines

Capturing Perception of Integrity around Customs Operations & Administration

2023 EDITION
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Preface

This document contains the main materials needed for the organization of a Customs Integrity Perception Survey (CIPS). This survey aims to provide to Customs administrations an instrument that helps them to evaluate the perceived level of integrity in their organization, and the evolution of integrity perception over time. It allows to conduct this evaluation from both an internal and external perspective, by surveying Customs officials and/or private sector stakeholders, respectively. For each of both groups, a set of performance indicators have been developed that can be measured by means of 2 separate questionnaires. The questionnaires are fully modular, meaning that survey organizers can choose which indicators are relevant to them, depending on their evaluation needs and priorities.

This document consists of 3 parts. The main part comprises a set of guidelines for the organization of a CIPS in a given country. These guidelines describe the main objectives of the survey, the design of the indicators and questionnaires, the target populations, the different ways (modes) by means of which a survey can be organized, what to watch for when organizing a survey fieldwork, how to validate fieldwork and data quality, and how the analysis and reporting of the data can be approached.

Annexed to these guidelines are the 2 questionnaires to be used in the survey. A third annex gives an overview of the link between each performance indicator and the different questions in the questionnaires.

These guidelines were initiated by the WCO’s Anti-Corruption and Integrity Promotion (A-CIP) Programme for Customs, funded by the Norwegian Agency for Development Cooperation (Norad) and Canada. They incorporate inputs from professional survey services providers, including Ipsos, EY Germany and PwC Germany, as well as feedback from A-CIP Partner Administrations, WCO Member experts in performance measurement and data analytics, and Academia.
1. OBJECTIVES

The main purpose of the Customs Integrity Perception Survey (hereafter referred to as CIPS) is to assess in a quantitative way how Customs administrations' employees and private sector stakeholders individually evaluate, or perceive, the level of integrity in Customs administrations, using the ten key factors of the WCO’s Revised Arusha Declaration Concerning Good Governance and Integrity in Customs as a framework. Specifically, this survey allows to verify how successful these groups think that Customs administrations are in promoting integrity and battling corruption among their employees. In doing so, the CIPS is an instrument that can help improve the capacities in Customs administrations and related institutions such as the WCO to measure the administrations’ performance in the area of integrity and anti-corruption.

The CIPS is not designed to be a stand-alone tool to measure integrity within Customs administration and operations, but rather part of a hybrid approach that includes a number of different measurement methods, including more detailed and qualitative integrity assessment using WCO tools such as the WCO Integrity Development Guide (IDG), which are also aligned with the WCO’s Revised Arusha Declaration, as the Customs community’s key policy in this respect Declaration.

The CIPS is also not intended to be an instrument of academic research, although the results data may be useful and drawn upon to provide insights for specific research questions, should the content align. Rather, the CIPS fills a gap in general data collection for benchmarking and performance measurement on integrity perceptions that is currently not available elsewhere. Other integrity perception surveys, such as Transparency International’s Corruption Perception Index (CPI), cover a much wider area of integrity perceptions but, in so doing, make it hard for Customs administrations to distil aspects that they can specifically respond to or act on.

The CIPS was originally developed as a tool embedded in the multi-annual WCO Anti-Corruption and Integrity Promotion (A-CIP) Programme for Customs. This programme aims to improve governance and integrity in WCO member countries and supports a selection of countries in implementing concrete measures to battle corruption and promote integrity in their Customs administrations. Within this context, the primary objective of the CIPS in the context of its use under the A-CIP Programme is to help set a benchmark that quantifies the current perceived level of integrity in these administrations. With this benchmark as a starting point, the survey is repeated at least once every 2 years.
for the duration of the A-CIP Programme, so that quantitative evidence can be gathered on the success of the measures implemented to improve integrity and counter corruption.

However, beyond its use in the A-CIP Programme, it is envisaged that the survey can also be deployed in and by other WCO member countries, should they want to evaluate and/or track the integrity performance of their Customs administrations in a more standardised way.

With the above context and general goals in mind, the CIPS has been designed based on the following concrete objectives:

• The CIPS offers the means to quantify, in the first place, perception of integrity as a proxy of actual integrity and anti-corruption performance. In addition to that, the CIPS also measures behaviour indicators – either reflecting the self-assessed ability to act with integrity or the impact that (a lack of) integrity in Customs administrations has on the performance of the target respondent groups.

• Through its indicators, the CIPS measures those aspects of integrity performance over which Customs administrations have at least some control. Note that if the survey is focused on Customs, other government agencies may also be impacted by corruption. In other words, in order to act as an instrument for performance improvement, the CIPS measures only that which Customs administrations can actually improve, or what is in the authority of a head of a Customs administration to make a decision or directly act on. It therefore focuses primarily on how Customs officials and private sector stakeholders evaluate concrete procedures, infrastructure and workflows, rather than measuring their abstract opinions and mentalities that are difficult to link to concrete measures.

• The CIPS is designed to track the evolution of integrity performance in Customs administrations by offering a standardized measurement instrument that can, first, set a benchmark, and subsequently be repeatedly implemented over time to assess the success of measures taken to improve integrity.

• The CIPS is set up as a modular instrument, meaning that Customs administrations can implement separate parts of the survey depending on their priorities, strategic goals and measurement needs. Concretely, the CIPS is separated in 10 modules, each dedicated to one of the 10 main areas of the Revised Arusha Declaration (see chapter 2). Each module is independent and can be implemented separately.

• The modular approach also ensures that the CIPS is easily scalable. This is important to allow flexible implementation, suited to the available resources, time and organizational capabilities of Customs administrations. The scalability of the CIPS goes beyond the possibility to use individual modules. The indicators themselves are, in principle, also independent of each other, so that administrations can select the individual indicators that they deem appropriate for their objectives, or the number of indicators that fit within their budget.

• The independent status of the basic indicators for each area at the same time allow for the building of more complex aggregate indicators. Indicators can be grouped and summed, and they can be assigned different weights according to the importance of these indicators for the administration’s goals. This makes the CIPS suited for any context in which a particular Customs administration finds itself when evaluating their integrity performance.

• The CIPS allows to cover two distinct target groups: Customs administration officials and private sector stakeholders. Because of their different position and perspective, a separate set of indicators is designed for each group, so that they can be surveyed independently. The combination of both the internal (Customs officials) and external (private sector stakeholders) perspective provides a 360-degree overview of how the Customs administration is seen to perform when it comes to integrity and anti-corruption.

• Finally, the CIPS is designed in such a way that it can be implemented independently by Customs administrations while ensuring standardization and comparability of the results of each instalment. This methodological guideline document is an indispensable companion in this. It provides Customs administrations with the necessary information needed to achieve a survey output of maximal quality and put the survey instruments to work as they are intended, without needing too much outside assistance.
12. TARGET POPULATION

As indicated in the previous section, the CIPS is designed to measure the perception of the integrity performance of Customs administrations among 2 distinct target groups: Customs administration employees on the one hand, and private sector stakeholders on the other hand. While the first group provides an internal perspective – how is the administration’s performance evaluated by those who work in the administration – the latter gives an external perspective – how is it evaluated by the businesses that are in contact with Customs administrations as part of their trade? To capture both perspectives in the best way possible, the survey consists of two separate questionnaires, each designed specifically for one of the 2 target groups.

The definition of both target groups is crucial for the accurate collection of data and for relevant analysis. It needs to be determined who is eligible to participate in the survey, so that only data is collected from people that hold relevant information. It is also advised that background information about the survey respondents (for instance, the function of a Customs employee within the administration or the sector in which an enterprise operates) is collected as part of the survey, so that differences between different types of respondents can be analysed.

For Customs employees, it can be chosen to target only employees from specific departments or specific offices. It is also an option to only target employees of specific levels, for instance when one is particularly interested in how lower-level staff perceives the integrity performance of higher management staff.

For private sector stakeholders, a careful delimitation of who will be targeted is even more crucial, given the vast size of the target group under the maximal definition. First, it should be noted that this target group contains three different subgroups:

- **Private enterprises**: enterprises that either deal with Customs themselves or via Customs brokers, but for which in both cases their experience with Customs has a direct impact on their business.

- **Customs brokers**: entities or individuals which carry on the business of arranging for the Customs clearance of goods and deal directly with Customs for and on behalf of other private enterprises. While Customs brokers support traders by providing all necessary documentation and undertaking formalities related to clearance of goods, they are also expected to maintain government interests by ensuring compliance with Customs and other regulatory requirements and the collection of appropriate duties and taxes.

- **Carriers**: entities or individuals transporting goods or in charge of or responsible for the operation of the means of transport including reporting cargo to Customs.

- **Industry associations**: organizations offering services to and representing the interests and views of private enterprises in dealing with government. Industry associations do not trade goods themselves, but many of their members may be traders, and associations can play an important role in articulating and discussing issues of importance to Customs and the private sector.

Note that for the purposes of the Integrity Perception Survey it is advised that only private stakeholders residing in the country of the Customs administration are considered part of the target population. This is primarily for practical reasons: in principle, any private enterprise that exports goods to the target country is a potential respondent as soon as they have been in contact with the country’s Customs administration. Taking all such enterprises into account would vastly increase the size of the target population and designing a balanced sample would be extremely difficult.

The following are the definitions of the two target groups as used for the development of the CIPS.

- **Customs administration employees**: all employees of the Customs administration that want to evaluate their performance, including senior management.

- **Private sector stakeholders**: all enterprises or representatives of enterprises (specifically Customs brokers and industry/sector associations) that as part of their activities deal with the Customs administration that want to evaluate its performance.

These target groups are broadly defined – that is, the above definitions describe all who are assumed to hold valuable information for the scope of the survey and thus are deemed suitable to participate in the survey. This does not mean, however, that the whole target group should effectively be included in a survey. More so, this is not always practically feasible or necessary to fulfil the research objectives.
2. A modular and scalable approach

2.1. 10 MODULES

The CIPS is organized along 10 modules. Each module focuses on a separate key factor that has been determined as vitally relevant when it comes to integrity in Customs administrations in the Revised Arusha Declaration.

For each of these factors, the Revised Arusha Declaration lays out a framework that details what Customs administrations should aim for in terms of infrastructure, procedures, tools, mentality and relations between senior management, employees and the private sector - all with the ultimate goal to create an environment that allows to maximize integrity and minimize corruption. Based on these frameworks, concrete indicators have been developed for each factor that allow to quantify to what extent, in the eyes of the survey target groups, the goals set forward by the frameworks have been achieved. Each indicator is linked to one question through which the indicator is to be measured (see Annex 3).

2.2. 2 SETS OF QUESTIONS

Within each area, two groups of indicators have been defined, each aimed at a separate target group in which these indicators are to be measured: employees and management of Customs administrations at the one hand, and private sector stakeholders (such as enterprises and industry associations) at the other hand. Since both groups are each at one end of Customs services, they take a very different but equally important perspective with respect to the functioning of Customs administrations and their integrity. Both perspectives are needed to come to a comprehensive assessment on how well Customs administrations are performing when it comes to integrity. However, because of this different perspective as well as their distinct characteristics, they should be surveyed separately. For that reason, 2 separate sets of questions have been prepared, one to measure indicators focused on Customs officials, and another to measure indicators aimed at private sector stakeholders.

The two question sets each measure their own indicators, meaning that it is strictly speaking not necessary to survey both target groups in order to come to an understanding of how well the Customs administration is performing in any of the Revised Arusha Declaration elements. However, as said, both groups have their own unique relation with the Customs administration, and to come to a comprehensive evaluation that takes into account both perspectives, it is recommended that both target groups are surveyed, and thus that two surveys are organized.
2.3. SELECTING INDICATORS AND QUESTIONS

Together, the 2 questionnaires, their modules and the indicators within each module are meant to cover as much as possible of the whole integrity improvement framework laid out by the Revised Arusha Declaration – at least with respect to those aspects of the framework that can be evaluated through a perception survey among Customs officials and private sector stakeholders. This exhaustive approach has resulted in an extensive list of indicators. From a practical point of view, however, a decision to measure all of these indicators in a single survey should be very carefully considered. This would result in a long questionnaire that could have several disadvantages. First, it diminishes the chance of finding enough respondents that want to fill it in entirely. Second, it puts a higher burden on respondents, increasing the risk of unreliable responses because of response fatigue (especially towards the end of the survey). Third, because of this higher burden, there is a risk of selection bias.

Rather, Customs administrations should identify priority areas and the indicators that are most relevant for their evaluation needs and strategic goals. Some areas or indicators might not be applicable for a certain administration – for instance, if they have no formal code of conduct within the organization, it is not useful to measure the indicators related to that area. In other cases, administrations might want to focus on gathering data that can measure performance in specific areas under which the administration is focusing strategic integrity interventions – for example if one of an administration’s strategic objectives is to increase transparency, then the indicators related to that key factor may be prioritised.

The questionnaires are designed to allow this. The modules are fully independent of each other. In principle, Customs administrations can freely select the modules and the indicators within a module. A small number of questions that need to be asked together in order to measure a single indicator form an exception to this – these are marked as belonging together in the question lists. Which modules or questions are selected fully depends on the administration that organizes the survey and their needs. It is in any case advised that administrations go first through a process to determine, based on the Revised Arusha Declaration key factors, which factors need the most attention, before selecting the modules/indicators that fit the identified objectives. The WCO Revised Integrity Development Guide’s self-assessment pages, for instance, can be a helpful resource in making this determination.

Indicators across modules of CIPS can display a certain degree of correlation to each other. This is because integrity is essentially cross-cutting, and the perception of one indicator can be linked to the perception of others. Despite the fact that the modules are designed to assess the key factors separately, some indicators inevitably show some correlation to the others. For example, in the private sector questionnaire the module "Relationship with the Private Sector" has some indicators evaluating how the private sector deal with external whistleblowing channels, hence related to the module "Audit and Investigation".

Examples of correlated questions in private sector survey

<table>
<thead>
<tr>
<th>Questions – factor 10 “Relationship with the Private Sector”</th>
<th>Related factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Whistleblowing external channels</td>
<td>Factor 6 – Audit &amp; Investigation</td>
</tr>
<tr>
<td>Whistleblowing external protected</td>
<td>Factor 6 – Audit &amp; Investigation</td>
</tr>
<tr>
<td>Whistleblowing external</td>
<td>Factor 6 – Audit &amp; Investigation</td>
</tr>
</tbody>
</table>
2.4. SURVEY LENGTH

The modular design makes that there is in principle no lower limit to the number of questions that can be included in a survey. This offers a lot of flexibility for administrations that have only few resources to spend on a perception survey or have determined that they only have very specific evaluation needs. Importantly, it is also convenient when it is chosen to collect data by integrating questions in a larger, existing survey (rather than organizing a stand-alone survey - see section 2.5 below).

As for an upper limit to the amount of questions to be included in a single survey, a maximum of 30 items can be used as a rule of thumb. A higher number would require further consideration to balance the delivery method with the burden on respondents.

One way to adapt the delivery method, if a Customs administration has determined that there is a need to evaluate more indicators than is feasible to include in a single survey, the evaluation could be spread over separate surveys, which could be organized alternately (e.g., one survey per year, to come to a full evaluation after a cycle of 2 years).

If there is uncertainty about the length of a survey, it can be useful to test the survey within the project team. This can be done by having a team member (ideally someone not yet familiar with the questions) fill out the questionnaire, or by having one member act as the interviewer, and another as a respondent. Such a role-playing exercise gives a good indication of how long the survey will take to complete in the field. In such a test, it is important to test the full questionnaire – that is, including the introduction as well as any screening and background questions (see chapter 3). A further testing of the survey length can be done in a live setting as well, by means of a pilot test (see chapter 4).

2.5. STAND-ALONE VERSUS INTEGRATED USE OF THE MODULES

In some countries, Customs administrations who want to organize an Integrity Perception Survey might have the choice between organizing a stand-alone survey that is fully dedicated to their evaluation needs and adding one or more modules to an already existing survey. The latter option might not be available in all countries, as it fully depends on which surveys are already being organized in the country that accept add-on modules by third parties. This possibility is also much more likely to exist for surveys among private sector stakeholders (especially surveys aimed at private enterprises), and much less so for Customs officials. The latter group is highly specific, although it is worth checking if there exist surveys among public servants in which the Customs administration modules could be integrated (e.g., personnel satisfaction surveys).

Both ways of organizing a survey each have their own advantages and disadvantages. In general, the trade-off to be made is one between the potential for a more comprehensive survey with closer control over the execution, but at a higher budget (a dedicated survey); and a limitation to a smaller amount of questions and less direct control over the execution, for a lower budget (an integrated module). The below table gives a detailed overview of the pros and cons of both options.

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1. Of course, if a Customs administration already organizes general employee surveys among their staff, the Integrity Perception Survey modules and questions are well-suited to be integrated in such a survey.
2. A MODULAR AND SCALABLE APPROACH

### Stand-alone survey

**Advantages**
- It is possible to measure many indicators of the Perception Survey.
- All aspects of the design, from sampling to fieldwork organisation and data storage can be controlled by the Customs administration.
- It is possible to design the survey in such a way that it focuses on the target group(s) that are of the most interest (i.e., Customs officials and private stakeholders involved in cross-border trade).
- There is more control over the timing of the survey - i.e., when and how often is it organised.
- An integrated module is more convenient when only a few indicators need to be measure, and when thus only a small number of questions need to be asked.
- Integrating questions in a parent survey is more cost- and resource-effective than a stand-alone survey, because the overhead costs and organizational burden are shared among all participants in the parent survey.
- If the parent survey has been organised before, it is likely that one can lean on existing expertise and infrastructure for the organisation of the survey.
- Depending on the scale of the parent survey, it might be possible to reach a (very) large part of the target population.
- If the parent survey has solid funding, it is likely that the survey will be organized at regular intervals, which is convenient for follow-up evaluations.

### Integrated module

**Disadvantages**
- A stand-alone survey is costly and resource-intensive.
- If multiple waves of the survey are planned, a long-term planning and resources commitment is needed.
- Because of a lack of resources and infrastructure, it might be more difficult to reach a large part of the target population.
- It will typically only be possible to include a small number of questions in the parent survey.
- There is less control over the design and execution of the survey, which is typically decided by the organizers of the parent survey.
- The target group of the parent survey might not fully fit the target group of the Integrity Survey (e.g., it might focus on public officials beyond Customs employees, or private enterprises with no Customs experience).
- Possibility of integration in a parent survey fully depends on whether and when such parent surveys are organized.
- There is typically no control over the timing of the parent survey (when and for how long is it organized), meaning that the integrity evaluation needs to be planned according to the timing of the parent survey, rather than the other way around.

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It goes without saying that the most crucial precondition for the organisation of the CIPS as an integrated module in a larger parent survey is the existence of a parent survey in which a module with Perception Survey questions can be included. This might not be the case in all countries, and in any given country it is more likely that parent surveys with room for add-on modules exist for private sector stakeholders (specifically for private enterprises), compared to surveys for Customs officials.
3. Survey questionnaires

This chapter gives an overview of the contents of the two questionnaires that together make up the CIPS. One questionnaire aims to collect data among Customs officials, and another among private sector stakeholders. Although these two target groups are very distinct and can provide very different (but complementary) input, the structure of the questionnaires for both groups is largely similar.

As discussed in chapter 2, the questionnaires are both constructed around the 10 Revised Arusha Declaration key factors. For each of these factors, questions are asked to measure either perception or behaviour indicators. Not all Revised Arusha Declaration factors are evaluated in equal detail amongst both target groups, and some factors are only evaluated amongst one. Likewise, for some factors it is not relevant to or possible to measure behavioural indicators.

The table below provides an overview of which factors are measured amongst which target group, and how many indicators have been developed for each factor and each target group.

<table>
<thead>
<tr>
<th>Indicator type</th>
<th>Number of indicators</th>
<th>Customs officials</th>
<th>Private sector stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>perception</td>
<td>behaviour</td>
<td>perception</td>
</tr>
<tr>
<td>Leadership and Commitment</td>
<td>7</td>
<td>/</td>
<td>3</td>
</tr>
<tr>
<td>Regulatory Framework</td>
<td>4</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td>Transparency</td>
<td>2</td>
<td>2</td>
<td>5</td>
</tr>
<tr>
<td>Automation</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Reform and Modernization</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Audit and Investigation</td>
<td>3</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Code of Conduct</td>
<td>6</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Human Resource Management</td>
<td>4</td>
<td>/</td>
<td>/</td>
</tr>
<tr>
<td>Morale and Organizational Culture</td>
<td>3</td>
<td>/</td>
<td>1</td>
</tr>
<tr>
<td>Relationship with the Private Sector</td>
<td>3</td>
<td>/</td>
<td>3</td>
</tr>
</tbody>
</table>
The ways in which the indicators are measured are similar for both questionnaires. The main means of measurement used is the extent of agreement with a specific statement, along a 4-point scale ranging from “strongly agree” to “strongly disagree”. A “don’t know/refusal” option is not offered, because the result provides little value for data analysis. An example is shown below:

**The Customs administration has a client service culture.**

- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

A second metric used regularly throughout the questionnaires is occurrence and frequency of occurrence. This is especially used often to measure behaviour - i.e., whether and/or how often the respondent has engaged in certain behaviour:

**I ignore Customs regulations because they are too complex.**

- 1 Always
- 2 Often
- 3 Sometimes
- 4 Never

A four-point (even-numbered) Likert scale has been chosen instead of a 5-point (or odd-numbered) scale. This may result in some survey bias, as it forces participants to select responses that lean one way or another, with no neutral option. However, including a neutral option with an odd-numbered scale can also result in survey bias as respondents score down the middle, or ‘straightlining’ neutral as a result of survey fatigue. Another element of survey design that was included to avoid survey fatigue by respondents was to vary the potential positive or negative implications of the response options. In the two examples above, if positive or negative values were applied, option 1 of the first question (“strongly agree” there is a client service culture) may be considered the most desirable for the administration, whereas option 1 of the second question (“always” ignore Customs regulations) would be the least desirable. This can also help avoid respondents scoring down one line, straightlining, without due consideration for each question asked.

A specific question type included in both questionnaires to measure behaviour is a scenario test. In these questions (one for each target group), the respondent is presented with a hypothetical scenario, along with some possible reactions. By using a hypothetical scenario rather than directly asking for real behaviour, respondents might be more likely to report in truth how they would act. While this should not be treated as a measure for actual behaviour, it does give insight in the potential for such behaviour among the target group.

**Imagine the following scenario. You are asked by a Customs official to pay a fee to speed up the Customs process. How would you react? (whistleblowing behaviour)**

- 1 You refuse
- 2 You refuse and report the incident
- 3 You pay the fee
- 4 You ignore the question and ask for your case to be processed according to the procedures

Lastly, responses to four questions (three from the Customs officials questionnaire and 1 from the private sector questionnaire) provided nominal versus ordinal variables. Nominal variables provide variables with no specific order, therefore not conducive to applying a value scale.
Once the survey mode, the sample design and the questions to be part of the questionnaire have been determined, it is advised that the survey is tested by means of a pilot test. In such a pilot test, the survey is deployed to a small subset of the total sample – e.g., a few dozen of complete interviews in one or a few countries.

A pilot survey allows to test
- whether the fieldwork infrastructure is working well (e.g., the technical setup, the translations, but also the successful briefing and training of the interviewers, if any are used)
- whether there are no quality issues that require immediate changes to the design and/or the questionnaire (e.g., a high non-response rate in general or for specific questions, or an interview length that is much higher than anticipated)
- whether the calculation of the indicators from the question responses, and any other recordings of the data, are functioning correctly.

A pilot survey should be distinguished from a cognitive test. The latter is a separate type of testing that is specifically aimed to evaluate the design of a questionnaire during its development. It looks to verify whether questions are clear to respondents, easy to understand and to respond to, not too sensitive, and whether they generate input that is relevant for the research objectives. The questionnaires that have been developed for the CIPS have been tested to that purpose already. That does not mean that a pilot survey cannot identify issues with certain questions, and that specific contexts in which the survey is executed cannot warrant small changes to the questionnaire. However, given that the CIPS questionnaires have been standardised for identical use in all countries, and that the individual questions are linked to indicators based on the Revised Arusha Declaration, it is important that any changes to questions are always discussed with the WCO before implementation, to verify that the correct calculation of integrity evaluation indicators is still ensured. Such changes should also always be documented clearly and fully so that they can be shared with anyone responsible for evaluating the survey results and be used in later waves of the same survey as well, to allow for trend evaluations.

The length and scope of a pilot test is dependent on the size of the survey itself, the available budget and the testing needs. In case of small surveys with few uncertainties, a “soft launch” could be opted for. In case of a soft launch, the fieldwork is started on a small sample size, to allow for a limited number of necessary technical checks on the fieldwork infrastructure and the data collection systems. If these checks do not show any issues, the fieldwork can be opened for the full sample, and the interviews in the soft launch can be easily included in the final sample. This approach is most advised for smaller surveys where there is little risk about any sample or questionnaire length issues.

At the other end of the spectrum are full pilot tests that allow for extensive testing of the survey design and the questionnaire. For such tests, a large enough sample size should be foreseen. Also to be planned for is enough time after the pilot survey fieldwork to perform analyses on the data to evaluate their quality (see chapter 8 below), and time to implement necessary changes to the questionnaire and the broader design. Fieldwork staff (including interviewers, if used) can be briefed specifically for the pilot test to make them aware about specific areas of the questionnaire that they need to focus on (e.g., difficult or sensitive questions). After the fieldwork, feedback can be gathered in a summary report, which can be used to determine any necessary changes.
5. Fieldwork organisation

5.1. CHOOSING A SURVEY MODE

The CIPS questions are designed so that they can be implemented in any mode. This section presents the different modes that can be considered to organize the survey in, each with their own strengths and disadvantages. In general, the choice for a suitable mode for any installment of the Integrity Perception Survey will depend on the target group, the available resources, the size of the survey and the content of the indicators that are to be measured.

Survey modes are typically categorized in two broad types: interviewer-administered modes (if questions are asked and responses recorded by an interviewer) and self-administered modes (if respondents go through the questions and code the answers themselves). In addition to these, a hybrid (or supervised) mode is also possible. In that mode, respondents fill out the questionnaire themselves, but they are under supervision of a survey administrator that visits respondents at their office. In each mode type, further options are available depending on the technological support systems used to conduct the interview. A detailed overview of the advantages and disadvantages of each mode is given in the tables below. The modes are ranked according to cost impact, from lowest to highest.

<table>
<thead>
<tr>
<th>Mode</th>
<th>Description</th>
<th>Cost level</th>
<th>Cost-impacting elements</th>
<th>Best suited</th>
<th>Advantages</th>
<th>Disadvantages</th>
</tr>
</thead>
<tbody>
<tr>
<td>Self-administered web interviews (CAWI)</td>
<td>Respondents fill in the questionnaire online, via a link that they have received per e-mail</td>
<td>low</td>
<td>low supervision, uniform data collection without manual post-processing, easy recruitment via e-mail</td>
<td>• If e-mail addresses are available for the whole sample (most likely for the Customs officials survey) • If available resources are low</td>
<td>• this mode requires the lowest investment in terms of budget and staff • data are immediately stored in the right format without the need for manual input • respondents can fill in the survey at their own convenience and pace • the absence of a supervisor/interviewer can assure the respondent of their anonymity, decreasing the risk of response bias or non-response • a very large sample (e.g., potentially all Customs administration staff) can be contacted at once and with low impact on the overall cost</td>
<td>• respondents need a professional e-mail address • e-mail addresses needed in sample (often difficult to obtain for enterprises) • unsupervised data collection is more prone to quality issues • no supervisor/interview to which respondents can ask questions • anonymous character can boost concerns about who is behind the survey • Response rate among businesses is generally low, and e-mail contacts for businesses might not be available</td>
</tr>
</tbody>
</table>

Note: 2 If not all employees have their own e-mail address, it can be considered to gather personal e-mail addresses from employees. This would need to be done by the Customs administration that organizes the survey (if they don’t already have a list of personal e-mail addresses from their employees). If contact details are gathered specifically for the purpose of the survey, employees would need to be clearly informed about the purpose of gathering these contact details, as well as their personal data protection rights, the collection would need to be completely voluntary, and addresses should not be stored after the completion of the project. It should also be noted that asking people for their personal details to conduct the survey is likely to decrease the response rate.
### Self-administered pen & paper interviews (PAPI)

**Description:** Respondents fill in the questionnaire on paper, after having received them via e-mail or land mail.

**Cost level:** low/medium (depending on sample size)

**Cost-impacting elements:**
- low supervision, post-processing needed to digitalize the data, added costs to send out paper questionnaires per land mail.

**Best suited:**
- If available resources are low
- If no e-mail addresses are available for the target sample

<table>
<thead>
<tr>
<th>Advantages</th>
<th>Disadvantages</th>
</tr>
</thead>
<tbody>
<tr>
<td>low investment in fieldwork staff, some investment needed in staff to digitalize the data</td>
<td>higher operational cost if questionnaires need to be sent out per post</td>
</tr>
<tr>
<td>modern p&amp;p scanning technology allows to easily digitalize pen &amp; paper questionnaires at low cost</td>
<td>e-mail addresses needed if no land mail addresses are available</td>
</tr>
<tr>
<td>respondents can fill in the survey at their own convenience and pace</td>
<td>sending and receiving back questionnaires per post is very time-consuming</td>
</tr>
<tr>
<td>the absence of a supervisor/interviewer can assure the respondent of their anonymity, decreasing the risk of response bias or non-response</td>
<td>unsupervised data collection is more prone to quality issues</td>
</tr>
<tr>
<td>no e-mail addresses needed. If Customs offices have a central e-mail address, questionnaires can be delivered to the central address and copies can be printed for the local staff to fill out</td>
<td>no supervisor/interview to which respondents can ask questions</td>
</tr>
<tr>
<td>a very large sample (e.g., potentially all Customs administration staff) can be contacted at once</td>
<td>anonymous character can boost concerns about who is behind the survey</td>
</tr>
<tr>
<td>costly to send reminders if no e-mail addresses are available</td>
<td></td>
</tr>
</tbody>
</table>

### Interview-administered phone interviews (CATI)

**Description:** Respondents are called on the phone by an interviewer who asks questions and records answers in a computer system.

**Cost level:** medium (depending on sample size)

**Cost-impacting elements:**
- considerable fieldwork staff costs but relatively low staff compared to personal interviews, low post-processing costs since data are centrally and digitally recorded.
- costs for this mode are very sensitive to interview length and sample size (for both, higher means quickly increasing costs)

**Best suited:**
- If a telephone number is available for all target respondents (likely for private sector stakeholders but less likely for Customs officials)
- If close supervision of the interviews is deemed necessary but if resources are lacking for personal interviews

<table>
<thead>
<tr>
<th>Advantages</th>
<th>Disadvantages</th>
</tr>
</thead>
<tbody>
<tr>
<td>supervised mode means that interviewers can immediately explain survey objectives and address concerns from respondents</td>
<td>a telephone number is needed for all target respondents</td>
</tr>
<tr>
<td>possibility of many call-backs increases the chance that target respondents are reached, with a positive effect on the response rate</td>
<td>completion of the interview by an interviewer increases the chance of social desirability bias and non-response</td>
</tr>
<tr>
<td>interview-administered surveys have a lower risk of data recording issues</td>
<td>relatively high number of staff needed to conduct the interviews</td>
</tr>
<tr>
<td>Supervised computer-assisted interviews (supervised CAWI)</td>
<td>Supervised pen &amp; paper interviews (supervised PAPI)</td>
</tr>
<tr>
<td>--------------------------------------------------------</td>
<td>-------------------------------------------------</td>
</tr>
<tr>
<td><strong>Description:</strong> Survey supervisors visit respondents at their office, but respondents fill in the survey themselves (without involvement from the supervisor) on a tablet or computer.</td>
<td><strong>Description:</strong> Survey supervisors visit respondents at their office, but respondents fill in the survey themselves (without involvement from the supervisor) on a tablet or computer.</td>
</tr>
<tr>
<td><strong>Cost level:</strong> medium/high (depending on number of visits to be made)</td>
<td><strong>Cost level:</strong> medium/high (depending on sample size and equipment used)</td>
</tr>
<tr>
<td><strong>Cost-impacting elements:</strong></td>
<td><strong>Cost-impacting elements:</strong></td>
</tr>
<tr>
<td>• number of fieldwork staff needed (depending on the locations to visit and the total sample size)</td>
<td>• number of fieldwork staff needed (depending on the locations to visit and the total sample size)</td>
</tr>
<tr>
<td>• some additional cost for digitization of the interviews</td>
<td>• if confidence and sensitivity issues are deemed a high risk</td>
</tr>
<tr>
<td><strong>Best suited:</strong></td>
<td>• if target respondents are difficult to reach via e-mail or phone</td>
</tr>
<tr>
<td>• if confidence and sensitivity issues are deemed a high risk</td>
<td>• in case of large personnel sizes at a single office</td>
</tr>
<tr>
<td>• if target respondents are difficult to reach via e-mail or phone</td>
<td><strong>Advantages</strong></td>
</tr>
<tr>
<td><strong>Advantages</strong></td>
<td><strong>Disadvantages</strong></td>
</tr>
<tr>
<td>• personal presence of a survey supervisor can increase confidence in legitimacy of the survey</td>
<td>• location visits are cost- and time-intensive, especially if more than one visit is needed</td>
</tr>
<tr>
<td>• survey supervisor is available to immediately address questions and concerns from respondents</td>
<td>• security situation in some countries might make personal visits to certain locations difficult or impossible</td>
</tr>
<tr>
<td>• independent completion of the survey without direct supervisor involvement can boost confidence and trust in the respondents</td>
<td>• independent completion of the survey without direct supervisor involvement can boost confidence and trust in the respondents</td>
</tr>
<tr>
<td>• computer equipment needed means that either several tablets/computers are needed per location visit, or that interviews can only be conducted one by one.</td>
<td>• lower equipment cost compared to computer-assisted interviews</td>
</tr>
<tr>
<td>• location visits are cost- and time-intensive, especially if more than one visit is needed</td>
<td>• more interviews can be done at the same time (because no digital equipment needed)</td>
</tr>
<tr>
<td>• security situation in some countries might make personal visits to certain locations difficult or impossible</td>
<td></td>
</tr>
</tbody>
</table>
Interview-administered personal interviews (CAPI)

Description: Survey supervisors visit respondents at their office and conduct the interview themselves.

Cost level: Very high

Cost-impacting elements:
- Large fieldwork staff needed
- Very sensitive to interview length and sample size (for both, higher means more costs)

Best suited:
- If close supervision of the interviews is deemed necessary but if telephone numbers for every target respondent are not available, and if budget permits it

Advantages
- Supervised mode means that interviewers can immediately explain survey objectives and address concerns from respondents
- Completion of the interview by an interviewer increases the chance of social desirability bias and non-response
- Interview-administered surveys have a lower risk of data recording issues
- Very time- and staff-intensive because an interviewer is needed for each interview
- Location visits are cost- and time-intensive, especially if more than one visit is needed.
- Security situation in some countries might make personal visits to certain locations difficult or impossible

Disadvantages
- Supervised mode means that interviewers can immediately explain survey objectives and address concerns from respondents
- Completion of the interview by an interviewer increases the chance of social desirability bias and non-response
- Interview-administered surveys have a lower risk of data recording issues
- Very time- and staff-intensive because an interviewer is needed for each interview
- Location visits are cost- and time-intensive, especially if more than one visit is needed.
- Security situation in some countries might make personal visits to certain locations difficult or impossible

Taking into account the topics and the target population of the CIPS and considering the above-mentioned advantages and disadvantages of different survey modes, there are certain modes that are more likely to be suited and cost-effective than others for the CIPS. This, however, will always be partly dependent on the sample size, the available sample sources, and the available means to reach the target respondents.

Given the sensitivity of the survey topics, especially for Customs officials, and the fact that some questions wade into potentially illegal behaviour conducted by respondents, it is generally advised to use modes that do not use interviewers.

For the survey among Customs officials, an unsupervised CAWI survey is the most efficient and cost-effective survey mode. The feasibility of this, however, depends on how the target respondents can be reached. If all targets have an individual work e-mail address known or collectable by the survey organiser, the survey questionnaire can be easily spread amongst everyone. If, however, only part (or none) of the targets have an individual e-mail address, the targets without an address need to be reached in another way. The most straightforward way to do this is by offering them the questionnaire on paper. This is a fairly cost-effective alternative if the sample size is low and if completed surveys only need to be gathered from a few locations (i.e., Customs offices across the country). For bigger sample sizes and if surveys need to be gathered from a lot of locations, costs for data collection and digitisation of the results can increase quickly. In that case, a smaller sample size can be chosen among, for instance, only a subset of locations.

For the survey among private sector stakeholders, the most suited mode depends on the exact profile of the stakeholders. If the focus is on private enterprises, a mix of CATI and CAWI will most often yield the best results, especially if a good quality number register is available of companies in the country. CAWI surveys are less suited to target private enterprises, since e-mail contacts will often not be available. Also, if specific profiles within a company or organisation need to be reached (e.g., CEO, directors, salespeople or anyone specifically dealing with Customs), an interviewer-administered survey mode is very much commended, since the interviewer can identify the correct person and get past gatekeepers like receptionists and personal assistants. With unsupervised modes (CAWI, PAPI), such specific targets within a company or organisation are very hard to reach if no direct contact details are available.

If direct contact details are available for the target stakeholders, a CATI survey is still advised. Professionals are often hard to pin down for a survey, and interviewers offer the best chance to gather data immediately when contact is established – whereas unsupervised web surveys are easier to ignore, even with multiple reminders. If budget allows, however, stakeholders could be offered multiple options to complete the survey: immediately on the phone, via the web, or even via pen & paper. This will typically help to increase the response rate especially amongst high-profile stakeholders with little availabilities for a phone interview.

Finally, when surveying private stakeholders for whom direct contact details are available, a full CAWI survey is still an interesting option, especially the budget is restricted. This will likely come with a lower response rate than what would be achieved with a CATI survey, but at a much lower cost as well.
5.2. INTERVIEWERS

5.2.1. Interviewer profile and conduct

If the survey is administered by interviewers, it is important that they have the right profile to conduct interviews in the context of the CIPS. As a minimum standard, interviewers should be native speakers of the interviewing language. Using non-native speakers is not only likely to cause communication issues, putting accurate data collection at risk, but it will also induce distrust in the respondents.

It is also advised that survey implementors would use interviewers with some experience in business and stakeholder surveys. Such surveys typically share the following common characteristics, and interviewers with experience in this type of surveys will be most familiar with how to deal with them:

- Target respondents in such surveys are often short on time, since they are contacted in their work environment, meaning that an interviewer should be able to engage the respondent from the first moments of contact, convincing them to participate.
- In addition to that, it is likely that respondents are familiar with the survey organiser and their own relationship with this organiser (either as an employee or as a stakeholder). This relationship can influence their willingness to participate and the way in which they are willing to answer individual questions. Interviewers should be able to comfort respondents and to create an atmosphere of trust.

- Finally, depending on the survey mode, the target population and the level of detail in the sample, interviewers might be required to get past ‘gatekeepers’ (e.g., receptionists, personal assistants, superiors) to reach the target respondents.

5.2.2. Training interviewers

If the survey is administered by interviewers, a standard approach should be applied by survey implementors to interviewer training. Besides standard training protocols on survey techniques and the use of any technical tools involved in the survey mode of choice, a dedicated training should also be developed with focus on the CIPS.

The training should be aimed at all fieldwork staff, including supervisors who will monitor the fieldwork.

Some important areas that should be covered in such a training are:

- The objectives of the survey
- The structure of the questionnaire, including some introduction to the Revised Arusha Declaration areas
- Any specialised terminology used in the questionnaire
- The profile of the target respondents (e.g., Customs officials and their functions, different types of private stakeholders)
- The contacting and screening procedure – i.e., how to approach and address the target respondents
- Considerations about the sensitivity of the survey topics, with reference to any questions that are to be treated especially carefully
- How to present the survey organisers (e.g., WCO) to the respondents

Given the sensitivity of some of the survey topics, interviewers should be able to explain very clearly to respondents how their responses and any personal data will be treated and what information will be shared with whom. They should also know how/why the respondents were selected for participation in the survey, and how their contact details were obtained.
5.3. SAMPLING

5.3.1. Sampling decisions – design, sources, size

One of the most crucial parts of organising a survey is the compilation of a sample from which to collect the data. Based on the target population and taking into account the survey mode to be used, in a first step a sample frame should be defined. A sample frame lists all target sample units (e.g., enterprises, Customs administration employees), and ideally also contains some means of contact (e.g., a physical or electronic address, phone number). If the size of the sample frame is limited, then it can be decided to invite the full sample frame to participate in the survey. This, for instance, can be the case for a survey among Customs administration employees, if the survey intends to include all employees. However, collecting data from all units in the sample frame can be difficult and is not always necessary. If the sample frame is very large (e.g., all enterprises that have been in contact with Customs), a smaller gross sample can be drawn from the sample frame. This gross sample will then be used to collect data from. Ideally, the gross sample is large enough to ensure a high enough final sample size of complete interviews. This then depends on the estimated incidence rate (how many of the targeted units will be eligible for participation) and response rate (how many of eligible targeted units will complete the interview).

The incidence rate for employee and stakeholder surveys like CIPS is typically high and can be 100% among Customs officials if the survey is targeted at the full work force of the administration. Among non-enterprise stakeholders as well, the rate should be 100%, since stakeholders are often known and selected for inclusion by the survey organiser. Exceptions to this are private enterprises. Enterprises will be only eligible for inclusion in the survey to the extent that they have been in contact with Customs. It will normally not be possible, however, to establish a sample frame that only contains such enterprises. If databases exist that contain information on export/import figures from enterprises, then this information can be used as a proxy to determine whether enterprises are eligible. If not, broader sample frames will need to be used, like a database of all enterprises in the country.

The response rate is difficult to determine for employee and stakeholder surveys. Factors that come into play here are the topic of the survey, the relation between the survey organiser and the target respondent, the possibility to send reminders and the survey mode. Among Customs employees, the response rate can be quite high if the survey is communicated well and if senior officials motivate their staff. Also among non-enterprise stakeholders, if there is a close relationship between the Customs administration and the selected stakeholders, the response rate can be relatively high, especially if the can be personally motivated and reminded to participate.

The response rate among private enterprises will likely be the lowest of all CIPS targets. This depends on the mode used (as said, phone surveys are normally more successful than web surveys in terms of response rates among enterprises), but as a rule of thumb, a 5% response rate can be set in order to determine the necessary gross sample.

Regarding the sample source, this also varies depending on the type of target:

- For Customs officials, a list of employees should normally be available. However, this might not contain personal contact details for each employee, as they might not all have a phone or e-mail address. In that case, as an alternative, the addresses of the administration office locations throughout the country (or globally) can be chosen as the primary sample frame. The survey can then be dispersed among these locations, with the request to further spread it among all employees at this location. Such an approach would almost always require the survey to be conducted via pen & paper.
- For non-enterprise private stakeholders, there will not be a single sample source, since the composition of this group fully depends on who is identified by the survey organiser as a target. In all likelihood, the sample will be populated by organizations from the organizer’s network for which the organiser has contact details.
- For enterprise stakeholders, sample databases per country are typically commercially available. These come with contact details (generally phone numbers, sometimes e-mail addresses), and generally also with some set of background details, if available and at an extra cost (like company size and sector). If commercial samples are not available for a country, the survey organiser can liaise directly with institutional database compilers, like statistics offices or chambers of commerce.

5.3.2. Contacting respondents, invitation and introduction

The way in which target respondents are contacted depends on the survey mode that is chosen (i.e., via phone, e-mail, land mail or a personal visit). If a self-administered web or phone approach is used, sending a pre-warning or invitation to the respondent prior to contacting them for the actual interview is not necessary, because the CIPS questionnaires are in themselves rather straightforward and do not require advance explanation or any preparatory work by the respondent. However, it is advised to establish preliminary contact in case of a face-to-face approach with location visits, so that appointments can be set for a visit. This avoids that an interviewer/administrator needs to pay multiple visits to a Customs office or enterprise, or that an interview is refused upon arrival.
In phone surveys, it is first of all crucial that contact is established between the interviewer/administrator and the respondent(s). This often requires multiple contact attempts, because the respondent doesn’t answer the phone immediately or is out of office. As a standard part of their fieldwork procedure, survey implementors should foresee multiple contact attempts to counter this.

In web and distance pen-and-paper interviews, questionnaires (or a link to the web questionnaire) are sent to potential respondents. In this mode, reminders should be sent after a certain period of time (e.g., a week) to targets that haven’t completed the survey yet.

In face-to-face and web-based approaches, it is possible to provide the respondent with additional information on paper. This can include the background of the study (e.g., the A-CIPP Programme), a reference to publications from previous waves of the survey, and references to websites that lay out in more detail the data protection procedures from the parties involved in the survey.

Keeping in mind the sensitive nature of the topics discussed in the CIPS, it is crucial that contacting respondents and introducing them to the survey is done with the utmost focus on building trust and comfort. This is discussed in more detail in chapter 7.

5.3.3. Screening and background questions

If it is not possible to construct a gross sample in which all sample units are certainly eligible, one or more screening questions need to be asked at the start of the survey to establish eligibility. The most obvious example are private businesses. The relevance of opinions on Customs from enterprises that have not been in contact with Customs administrations is low. However, it might not be possible to construct up front a gross sample of enterprises that have experience with Customs. Therefore, a broader sample (of all enterprises, regardless of their Customs experience) will be used, and each contacted enterprise will need to be screened at the start of the interview. This can be done by asking which the enterprise has exported or imported goods (in a certain reference period, e.g., the last 2 years), or more directly whether they have, as part of their business operations, been in contact with Customs administrations.

For other private stakeholders, such as (representatives from) chambers of commerce or anti-corruption NGOs, it is more likely that there will be some way to establish beforehand eligibility, although this too depends fully on the available sample frame. As discussed above, when defining and constructing a stakeholder sample, it will be up to the survey organizer who to target. If the organizer decided to focus on those stakeholders that they know and to whom they have access, then these members of the sample are by definition eligible for participation in the survey, and they shouldn’t be screened.

For the survey among Customs officials, a screening question will normally not be necessary, if the target population is the full work force of the Customs administration, or if there is an employee database that contains the necessary information to select the relevant subset of the work force (e.g., only lower level staff).

In addition to screening questions, the core questionnaire can also be completed with background, demographic questions to gather information on the respondents that is relevant for in-depth analysis. What information is useful depends on the research objectives. It should always be kept in mind that the information is only useful for statistically sound analysis if for each category identified, the sample needs to be large enough to draw comparisons. Also, some information might be available from the sample source (such as the department or the location within the Customs administration).

When selecting background, or demographic questions, there are two important aspects to consider. First is confidentiality – as noted elsewhere in these guidelines, the topic of integrity and corruption is particularly sensitive and therefore it is critical to take this into account in survey design. Therefore, demographic questions should be chosen to ensure that they do not adversely affect the respondents’ sense of confidentiality in answering the questions. Second, it is important to note the priority of demographic questions, ensuring that they are not simply nice to know, but rather essential to the central purpose of the survey, that is – that they will aid or contribute to decision-making and response actions.
5.4. FIELDWORK FOLLOW-UP

Well-designed survey materials, a high-quality sample, and thoroughly trained interviewers (if used) are all essential for a survey to ensure the quality of the resulting data. Nonetheless, the data collection itself still needs close monitoring, so that any issues are quickly detected, and necessary counteractions can be taken. The following aspects of fieldwork monitoring should be standard in any survey:

- **Fieldwork progress monitoring.** A regular monitoring of the progress of complete interviews throughout the fieldwork is necessary to see if progress is slower than expected. If that is the case, reminders can be sent (which is typically scheduled into the fieldwork planning by default) or it can be decided to extend the fieldwork period.

- **Response rate and sample performance monitoring.** Anyone responsible for executing the survey should have a system that registers the outcome of contacting a potential respondent. This way, it can be detected whether, for instance, there is a high proportion of **invalid contacts** (non-working e-mail addresses or phone numbers, enterprises that moved to another address, ...) or whether **respondents cannot be reached** (because they repeatedly don’t answer the phone or are not present when the enterprise is visited). Such issues may warrant adding extra sample (if available).

- **Direct data collection monitoring.** Survey implementors should also have procedures in place that allow to follow-up on the actual data collection itself. In interviewer-administered surveys, this can for instance be done by listening in to a phone interview or by reviewing recordings from face-to-face interviews. If issues are detected, feedback can be shared with interviewers afterwards, and they can be rebriefed or retrained if necessary.

- **In self-administered surveys, monitoring is in principle not possible.** In the hybrid approach, the survey administrator can monitor to some extent how well respondents have performed the task - for instance, by checking whether errors have been made. If that is the case, respondents can immediately be asked to correct them. This should be done carefully and with reservation, however, since such an immediate check breaches the anonymity that is precisely a strong asset of a self-administered survey. Given the sensitivity of the CIPS's topics, it is advised that survey administrators in a hybrid approach only check on how respondents complete the survey if they are asked explicitly by a respondent for help.

In many surveys, people are asked to deliver personal or sensitive information, sometimes about topics that they would normally not discuss spontaneously with someone else. It is always a challenge to ensure that respondents feel comfortable enough so that they are willing to provide complete and truthful answers.

Generally, there are two risks that need to be mitigated in this regard: the risk of social desirability bias, and the risk of confidentiality issues.

- **Social desirability bias** happens when respondents adjust their responses based on what they believe is the more socially desirable answer, in order to avoid an (implicit) judgement by those they are answering to. This can particularly occur when the content of the survey/question concerns attitudes on moral topics, or if respondents are asked to describe behaviour that could be (seen as) illegal or socially repressible.

- **Confidentiality issues** occur when a respondent is distrustful of how his responses will be handled – e.g., whether their anonymity is assured or whether particular responses will have (legal, professional, social) consequences.

Both risks are central to CIPS. Many of the survey indicators revolve around immoral or illegal behaviour, either conducted by the respondent or witnessed in other people. Particularly when it comes to surveying Customs employees, the role of hierarchy and employer-employee relations need to be considered as well, since employees will be asked to evaluate the integrity of their superiors as well as the performance of the administration they work for.

It is therefore crucial that at all stages of the survey preparation and execution, there is a strong focus on convincing respondents that their responses will be kept anonymous, and that no moral, legal or social judgment will be passed on their responses.

There are several stages in the survey project where this issue comes to the forefront, and at which point specific measures need to be taken to maximize the respondent’s trust and comfort.

- **Questionnaire design.** Already when developing the questionnaires for the CIPS, the risks of social desirability bias and confidentiality issues where central points of attention. Some of the question design measures taken to minimize these risks were:
  - **Neutral phrasing of question.** It was looked after that when questioning perceptions or behaviour that could be seen as socially undesirable, there is no implicit judgment built into the question.
- **Word choice.** As much as possible, legal and judicial terms were avoided. Such terms have the risk of highlighting to the respondent that their behaviour might have legal consequences.

- **Offering the possibility to explain behaviour.** An important objective of the CIPS is to assess what the underlying causes are of integrity breaches by Customs employees and private sector stakeholders. Rather than merely asking whether they have been part of such breaches, the questionnaire turns the reasoning around and asks whether particular aspects of their work and/or the functioning of the administration makes it hard to follow all the rules. This offers a way for respondents to report wrongdoing, even by themselves, because an external motivation can at the same time be given.

  - **Survey mode.** As discussed above, the choice of the survey mode not only has a large impact on how high the response rate to the survey will be, but also on how truthful respondents will answer. To maximize the chance of the latter, a self-administered mode may be used – that is, either a web survey or a pen-and-paper survey. It should be noted, however, that these modes are also the ones that have a risk of a lower response rate, especially among private sector stakeholders. If resources are available, a hybrid, supervised approach is worth considering, but this will come at a considerable extra cost because of the fieldwork staff needed to visit the Customs offices and/or enterprises. In that approach, locations can be visited personally by a survey administrator (a staff member from the survey implementor). However, the questionnaires are still filled in by the respondent without direct supervision from the representative. This can be done on paper, on a tablet or computer provided by the representative, or on the respondent’s own device via a link that they receive from the representative. The presence of the administrator has several advantages: not only can they provide assistance where necessary, but they can in person explain the objectives of the survey as well as the measures taken by the survey organizer to ensure anonymity and secure handling of the data. Receiving this information in person is often more assuring to respondents than only reading it on paper or via e-mail. Finally, meeting a survey staff member in person emphasizes to the respondent the fact that the survey is organized not directly by the Customs administration (or “the government”), but by an external, independent third party. This is especially important for Customs employees, who will be asked to participate in the survey (and thus evaluate their employer) during working hours.

  - **Survey presentation and invitation.** First impressions are always important, and this is no different in surveying. In all communication with a (potential) respondent, the survey project should enhance trust and comfort. Several actions are important in this regard:
    - **Invitation and introduction.** Potential respondents should, from the first moment of communication, be informed clearly about the objectives of the survey, how their response and personal data will be handled, why and how they are chosen to participate, and to whom they can turn to if they have questions or concerns. If the survey is conducted via a web interface or on paper, it is easy to provide to the respondent an informative letter. Such a letter should then also include contact details where they can send questions, particularly about the handling of their data. Web links that provide more context about the survey (e.g., to the A-CIP programme or the Revised Arusha Declaration) can also be included. In face-to-face or hybrid-approach interviews, the survey administrator can share this letter and immediately provide additional information when necessary.
    - **If the survey is conducted by means of phone interviews, such information needs to be transmitted orally. The time available to an interviewer to provide this information in a phone conversation limits how much detail can be given. It is then in any case crucial that the identity of the survey implementor, the survey objectives and the anonymity of any responses are clearly mentioned. In addition to that, interviewers should be thoroughly briefed on the background of the survey and the applicable data protection measures, so that they can promptly inform and reassure respondents if they have concerns.**
    - **Identification of the survey organizer.** Since the prime survey objective is to evaluate the level of integrity of the Customs administrations that are at the same time (co-)organizing the survey, the identification of the administration as an organizer is delicate. Respondents, especially Customs administration employees, might be concerned about the consequences of their responses if they know the data will be seen by their employer. At the same time, international survey research guidelines and privacy regulations make it mandatory to identify all organizers of a survey if asked by the respondent. Moreover, there is also an important upside to the identification of the Customs administration as an organizer, as such an identification gives the survey authority and guarantees its authenticity. It also offers an assurance to the respondents that their answers will indeed be used to improve the performance of the administration.
    - If identified as an organizer, it is also advised that respondents are clearly informed about what the role of the Customs administration is in the organization of the survey, specifically when it comes to data collection and storage. Respondents are more likely to feel protected if it is explicitly guaranteed that their data will only be stored by the party that executes the survey, and that their identity-linked responses will never be shared with the Customs administration.
    - For the CIPS, both the external survey implementor, if applicable, as well as the Customs administration (and/or the WCO) should be identified as an organizer of the survey. If a written introduction is provided, it
is preferable that the logos of the organizing parties are used, as well as a contact person (or dedicated e-mail address), and that a link is provided to web pages from the organizer(s) that can give background information on their role and objectives.

- **Complaint and question handling.** If respondents have concerns about any aspect of the survey (e.g., how their responses and personal data will be stored, why and how they were selected, how their contact details were obtained), it is crucial that such concerns are addressed as quickly as possible. If the survey mode involves an interviewer or a survey administrator, such concerns are ideally immediately handled, and any questions answered in person. To allow this, survey staff involved in the fieldwork should have thorough knowledge of the survey organization and how the response data will be treated. As part of the project training, guidelines could be prepared with standard answers to common questions from respondents. Also, within the entity that is executing the survey, fieldwork staff should be knowledgeable about the applicable data protection regulations in their country. Survey implementors should have a dedicated data protection officer who handles complaints related to data protection and privacy. Ideally, the survey implementor also has a web page or some other kind of communication that summarizes how they guarantee compliance with the regulations.

- **Publication/dissemination of the results and following actions.** A final measure to increase trust and comfort in the respondent is providing proof to respondents that their participation effectively matters, and that their responses are used to improve the performance of the Customs administration. This can be done by referring respondents to the results of previous surveys, possibly including an overview of actions taken by the administration to address issues and the success of these actions. If such information is not (yet) available, respondents can be offered the possibility to be kept informed about future publications of the results or about related actions taken by the administration – either personally if they provide their contact details, or via a general channel such as a web page.

The questionnaires of the Integrity Perception Surveys are designed with full focus on minimizing the chance of measurement errors. Questions in the survey are short, clear, concrete and possible to answer without putting an undue cognitive burden on respondents. In addition to that, interviewers should be selected carefully, and they should be trained thoroughly for their task. Respondents as well should be informed clearly about what the survey objectives are and what is expected of them, in a way that makes them comfortable and trusting. On top of that, the technical infrastructure used to record the survey responses needs to be tested before deploying the full survey.

As important as such pre-emptive measures are, however, there remains a risk of measurement errors at the side of the respondents and, if taking part in the data collection, the interviewers. For that reason, it is crucial that the survey output is checked for its quality. There exists a wide range of techniques to measure the quality of data, differing in complexity, precision and resource requirements. In general, however, data quality checks focus on two things:

- Are the data **accurate?** This typically relates to contradictions in responses by the same respondent, where only one of the responses can logically be correct, or to highly improbable responses (such as extremely high reported age or revenue).

- Are there indications that there was a **lack of effort** by the respondent and/or interviewer to respond or record the answers to their best efforts? In the data, this can only be measured indirectly for direct verification of the quality of the data collection in this respect, direct monitoring of the fieldwork is needed – see section 5.4.

In a survey that measures perceptions and behaviour, the first type of quality issues – inaccuracies – is of little significance. Self-assessment of behaviour cannot be compared against actual behaviour, and perceptions are by definition subjective. While it might occur that perceptions from a single respondent contradict each other, this is then merely a reflection of (often unmeant) inconsistencies in the respondent’s thoughts, rather than effective inaccuracies in their responses. In short, people can
and do hold contradictory beliefs, even about the same thing, and survey quality management should not try to “correct” this. The second area – effort issues – however is an important potential source of errors in any survey, and response data should be closely checked for indications of it. There will be an inherent tendency among respondents and interviewers to minimize the cognitive load of the task they are performing. This is unavoidable and even to some extent a positive thing – the easier to complete the survey, the higher the chance that all questions will be answered. However, it should not reach a level at which the cognitive effort is so low that responses are no longer reliable.

There are numerous data checks by which the (lack of) cognitive effort can be measured. The following 3 checks are typically part of a standard quality check plan and, depending on the survey mode, quite easily implemented.

- **Interview length.** There will always be large variation between respondents in how long they need to complete a questionnaire. Nevertheless, it can be assumed that, in order to fulfill a survey questionnaire in an appropriate manner, a certain minimum amount of time is needed. What this minimum length is of course depends on the length of the questionnaire and on the survey mode – interview-administered surveys will typically take longer to complete than surveys completed by respondents themselves. There can also be considerable differences between countries due to cultural reasons. Determining what constitutes “too short” of an interview is not easy. Generally, it is advised to define this in relative terms, based on the average length needed to complete the questionnaire – for instance by putting the minimum length at a certain percentage.

- **Straightlining.** ‘Straightlining’ is the phenomenon of respondents giving the same response to a large number of consecutive questions. This can indicate that they are completing the survey on auto-pilot (and/or that the interviewer is not motivating the respondent to really reflect on their answers). This can be caused by the question design, and it is also not necessarily a sign of low-quality responses – it is entirely possible that a respondent holds a similar opinion on many questions. Still, a combination of straightlining (especially if it occurs in several parts of the interview, or if it occurs towards the end of an interview) with a short interview length can support the identification of the interview as low-quality.

- **Item non-response.** If a respondent refuses, or is unable, to respond to a large proportion of the questions, the validity of the responses that they do give can be doubted. Failing to respond to many questions can, of course, also point to an issue in the question or sample design: the questions might be too sensitive or too difficult to answer, or the survey might target the wrong people. If that is the case, this should normally become clear already at the testing stage and would result in a high non-response rate among many respondents. However, if high non-response rate is seen in isolated cases only, it can be assumed that these respondents are unreliable.

**Quality checks will differ across survey implementors,** but the fact that they have systematic and transparent procedures in place that follow an evidence-based rationale is essential and should be a point of attention. When identifying an entity to execute the survey, it is important to verify which default data quality checks are in place, and which ones they intend to implement for the Integrity Perception Survey. Survey implementors should be able to share the thresholds they would use to determine at which point an interview is considered to be of bad quality, and to share the results of their quality checks.

<table>
<thead>
<tr>
<th>Quality checks recommendations</th>
<th>Supervised survey mode</th>
<th>Unsupervised survey mode</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Before survey</strong></td>
<td>Skip logic verification; verifying skip logic and branching are correctly implemented</td>
<td>Data collection and transfer check: testing the collection and transfer of data (either via hardware or online)</td>
</tr>
<tr>
<td></td>
<td>Survey hardware check</td>
<td></td>
</tr>
<tr>
<td><strong>2. During survey</strong></td>
<td>Survey completion time monitoring</td>
<td>Survey respondents selection</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>3. After survey</strong></td>
<td>Response consistency check: examine the consistency in responses across correlated survey questions</td>
<td>Missing values check: investigating and handling mission values</td>
</tr>
<tr>
<td></td>
<td>Survey completeness check: calculating the number of completed responses out of the number of initiated responses</td>
<td></td>
</tr>
</tbody>
</table>

If questions for the CIPS are **integrated in a larger survey,** it might be difficult to assert close control over how data quality is mentioned, since the overall coordination of the survey and decision power over the design and the organization might be in the hands of another party. Still, here too, it is important to obtain as much information as possible about the data quality control system that is put in place.
8. DATA ANALYSIS

8.1. INDICATOR CALCULATION AND BENCHMARKING

As discussed in chapter 2 of these Guidelines, the CIPS questionnaires are designed in such a way that each question is linked to a single indicator (see Annex 3 for a correspondence list between the indicators and the questions). This allows for easy indicator calculation, since there are no composite indicators that need to be calculated from multiple questions. By grouping indicators per factor, it is possible to calculate aggregate scores per factor of the Revised Arusha Declaration. If deemed relevant within the specific context, different weights can then be assigned to each indicator as part of the overall score. How such a weighted scoring is approached depends on the priorities of the administration that is organising the survey, and the one-on-one mapping between questions and indicators allows a lot of flexibility to develop scoring designs that serve the analytical goals of the organisation best. It should, however, be kept in mind that when there is to be trend analysis (i.e., when the survey is repeated at a later point to evaluate changes), the calculation of aggregate area scores should be done the same way, meaning that also the same questions need to be asked as in the first wave.

The score for each indicator can be calculated easily from the question responses. The majority of the questions use an agreement scale to code responses. Depending on whether the goal is maximal agreement, or maximal disagreement, the score can be calculated by summing the percentages from the top or bottom half of the scale.

For instance, for the first question below the score would be the sum of “somewhat disagree” and “strongly disagree”. For the second question, the scoring would be the inverse, i.e., the sum of “strongly agree” and “somewhat agree”:

• Strongly agree
• Somewhat agree
• Somewhat disagree
• Strongly disagree

To be able to evaluate whether the Customs administration meets the set goals with regards to integrity, score thresholds should be established. These should be decided by the administrations as they depend on the policy priorities. Care should be taken with setting goals when conducting this survey for the first time. Tentative scoring goals could be set based on available information and possibly previous surveys, but it is advised that the first survey as a benchmark survey. For next waves, relative (an envisaged increase/decrease) or absolute goals (a threshold to be met within X years) can be set based on the results from the first survey.

8.2. TREND ANALYSIS

Within the A-CIP Programme, the CIPS is envisaged to be repeated at least once over 2 years. This allows to evaluate whether progress has been made. For such trend analysis, the following points are important to keep in mind:

• The calculation of individual indicator or aggregate indicator scores must remain the same for all waves. This applies also to any weights that would be applied, and which questions that would be included in an aggregate score.
• Preserving comparability is key. This means that the questions should be kept identical.

• It is strongly advised that the survey mode remains the same for all reiterations of the survey. While the survey questions are designed so that they can be used in any mode, a change in mode is not recommended when conducting a survey on sensitive topics. Note that it is not necessarily the case that mode differences will occur – but rather that they are hard to measure, thus decreasing the reliability of the data without offering a possibility to calculate the bias.

• When integrity survey questions are integrated in a larger survey, it is advised that following waves are part of the same survey as well. If possible, it is also advised that the module is integrated in the same place in the parent survey, since question order can also have some effect on the data.

For integrated modules, control over the survey settings can be more difficult. For trend analysis, or at least to assess the possibility of trend analysis, it is crucial that information is obtained about the survey design (sample design, survey mode, questionnaire design, recruitment process) in each wave.

8.3. HANDLING CATEGORICAL DATA IN STATISTICAL ANALYSIS

Categorical data is data that can take on one of a limited and usually fixed number of possible values, representing different categories or groups. There are three main types of categorical variables: nominal, ordinal and binary.

Nominal data are categorical data that represent categories with no inherent order or ranking. In the case of the CIPS, nominal data is mainly made up of information related to the respondents’ country, region, and type of Customs administration.

Ordinal data, on the other hand, represent categories with a meaningful order or ranking. While the categories have a relative order, the differences between them are not precisely measurable or consistent. Examples of ordinal data from the CIPS include:

• Years of experience: 0-5, 6-15, 16 or more
• Leadership status: leader, not a leader
• Answers to perception indicators: strongly agree, somewhat agree, somewhat disagree, strongly disagree
• Answers to behavior indicators: always, often, sometimes, never
Binary data is a specific type of categorical data where there are only two categories or levels. In the CIPS, binary data is made up of:

- Gender: man, woman
- Answers of perception indicators: yes, no
- Answers to Q10b of the Customs officials survey: to exercise control on the business community, to facilitate trade

Many statistical algorithms and machine learning models, such as regression and decision trees, are formulated to work with numerical input. These algorithms are built on mathematical operations like addition, multiplication, and comparison, which are inherently defined for categorical variables.

As the CIPS consists of only categorical data, the encoding of categorical data to numeric form is a crucial pre-processing step to enable the application of a wide range of statistical and machine learning algorithms.

Encoding of categorical data for the statistical analysis discussed in this Guidelines is based on the following approach:

<table>
<thead>
<tr>
<th>Gender</th>
<th>Leadership status</th>
<th>Years of experience</th>
</tr>
</thead>
<tbody>
<tr>
<td>Man</td>
<td>1</td>
<td>0 – 5</td>
</tr>
<tr>
<td>Woman</td>
<td>0</td>
<td>6 – 15</td>
</tr>
<tr>
<td></td>
<td></td>
<td>16 or more</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Perception indicators (4-point Likert scale)</th>
<th>Behavior indicators (4-point Likert scale)</th>
<th>Perception indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strongly agree</td>
<td>Always</td>
<td>Yes</td>
</tr>
<tr>
<td>Somewhat agree</td>
<td>Often</td>
<td>No</td>
</tr>
<tr>
<td>Somewhat disagree</td>
<td>Sometimes</td>
<td></td>
</tr>
<tr>
<td>Strongly disagree</td>
<td>Never</td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>

There are some limitations for encoding categorical data. As encoding assigns a unique numeric label to each category, this may imply an ordinal relationship that may not exist in the data. Algorithms might interpret these numerical labels as having meaningful order, leading to potential biases. Some algorithms may misinterpret the encoded labels as having mathematical significance. For example, linear regression may assume a continuous relationship between the encoded values.

In addition, encoding assumes that the intervals between the ordered categories are equal, such as assuming the intervals between “somewhat agree” and “somewhat agree”, and “somewhat agree” and “somewhat disagree” are equal. However, this may not be true. If the intervals are not consistent, the model may make incorrect assumptions about the relationships between the categories.

8.4. EXPLORING CORRELATION AMONG INDICATORS

Correlation is a statistical measure that describes the degree of association between two variables. While traditional correlation coefficients like Pearson correlation are commonly used for numeric variables, specific methods are needed for assessing the correlation between categorical variables.

Polychoric correlation assumes that ordinal variables have an underlying continuous structure. This is particularly relevant when ordinal variables are considered to reflect an unobserved continuous trait or construct. Polychoric correlation takes into account the ordinal nature of variables, recognizing that the categories have a meaningful order.

Polychoric correlation coefficient ranges from -1 to 1. The sign of the Polychoric correlation coefficient indicates the direction of the correlation. A positive sign implies a positive correlation (both variables increase together), while a negative sign signifies a negative correlation (one variable increases as the other decreases). 1 indicates a perfect positive correlation. This means that as one variable increases, the other variable also increases, and the relationship is entirely linear. -1, on the other hand, indicates a perfect negative correlation. In this scenario, as one variable increases, the other variable decreases, following a precise linear relationship.

The magnitude of the Polychoric correlation coefficient reflects the strength of the association. The closer the coefficient is to 1 or -1, the stronger the correlation. A Polychoric correlation coefficient of 0 suggests no linear correlation between the ordinal variables. Changes in one variable do not predict or coincide with changes in the other.

It’s important to note that correlation does not imply causation. Even if two variables have a strong correlation, it doesn’t necessarily mean that one variable causes the other to change. Correlation only measures the degree to which two variables are related or associated.
## 8. DATA ANALYSIS

### Correlation coefficient matrix of selected indicators from Customs officials survey – Country X

| Pair | Q2a | Q2b | Q2c | Q2d | Q2e | Q3a | Q3b | Q3c | Q3d | Q3e | Q3f | Q4a | Q4b | Q4c | Q4d | Q4e | Q4f | Q4g | Q5a | Q5b | Q5c | Q6a | Q6b | Q6c | Q7a | Q7b | Q7c | Q8a | Q9a | Q10a | Q10b | Q10c | Q10d |
|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| 6a   | -0.33 | 0.25 | 0.11 | 0.56 | 0.84 | -0.35 | -0.16 | 0.12 | 0.47 | 0.36 | 0.71 | 0.57 | 0.59 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| 6b   | -0.45 | 0.36 | 0.29 | 0.29 | -0.58 | -0.14 | 0.04 | 0.34 | 0.13 | 0.56 | 0.59 | 0.64 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| 6c   | 0.21 | -0.24 | -0.31 | 0.01 | 0.05 | 0.34 | 0.14 | 0.07 | -0.21 | -0.19 | -0.09 | 0.17 | 0.37 | -0.10 | 0.38 |     |     |     |     |     |     |     |     |     |     |     |     |     |
| 6d   | -0.26 | -0.16 | 0.19 | 0.49 | -0.18 | -0.24 | 0.04 | 0.13 | 0.02 | 0.40 | 0.22 | 0.06 | 0.19 | 0.23 |     |     |     |     |     |     |     |     |     |     |     |     |
| 6e   | -0.24 | 0.36 | 0.00 | 0.12 | -0.07 | 0.08 | 0.01 | 0.15 | 0.04 | 0.20 | 0.38 | 0.29 | 0.14 | 0.22 | 0.25 |     |     |     |     |     |     |     |     |     |     |     |
| 6d1  | 0.22 | 0.26 | 0.44 | 0.39 | 0.53 | -0.14 | 0.00 | 0.21 | 0.30 | 0.43 | 0.51 | 0.47 | 0.02 | 0.39 | 0.34 |     |     |     |     |     |     |     |     |     |     |
| 6d2  | 0.07 | 0.02 | 0.38 | 0.02 | 0.30 | -0.22 | 0.14 | 0.14 | 0.50 | 0.88 | 0.21 | 0.76 | 0.53 | 0.11 | 0.57 | -0.71 | 0.57 | 0.28 | 0.99 |     |     |     |     |     |
| 6d3  | 0.20 | 0.06 | -0.83 | -0.70 | -0.40 | 0.33 | 0.30 | -0.11 | -0.15 | -0.13 | -0.17 | -0.46 | -0.15 | 0.15 | -0.34 | 0.00 | -0.20 | 0.00 | -0.16 | 0.00 |     |     |     |     |     |

### Correlation coefficient matrix of selected indicators from private sector survey – Country Y

| Pair | Q2a | Q2b | Q2c | Q2d | Q2e | Q3a | Q3b | Q3c | Q3d | Q3e | Q3f | Q4a | Q4b | Q4c | Q4d | Q4e | Q4f | Q4g | Q5a | Q5b | Q5c | Q6a | Q6b | Q6c | Q7a | Q7b | Q7c | Q8a | Q9a | Q10a | Q10b | Q10c | Q10d |
|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| Q5a  | -0.14 | -0.25 | -0.27 | 0.60 | 0.06 | -0.13 | 0.04 | -0.01 | -0.26 | -0.05 | 0.03 | -0.02 | -0.11 | 0.12 | 0.04 | 0.08 | 0.12 | 0.32 | 0.15 | -0.42 | -0.48 | -1.00 |     |     |     |     |     |
| Q5b  | -0.32 | -0.06 | 0.44 | 0.53 | 0.53 | -0.32 | -0.27 | -0.13 | 0.13 | -0.03 | 0.08 | -0.21 | 0.33 | 0.09 | 0.33 | 0.35 | 0.02 | 0.04 | 0.11 | 0.24 | 0.00 | -0.79 | 0.99 | 0.58 |
| Q6a  | -0.22 | -0.19 | -0.45 | 0.54 | 0.38 | -0.41 | -0.45 | -0.24 | 0.06 | -0.01 | 0.40 | 0.54 | 0.29 | 0.44 | 0.44 | -0.16 | 0.30 | 0.05 | 0.17 | -0.26 | -0.76 | 0.99 | 0.30 | 0.67 |
| Q6b  | 0.00 | 0.40 | 0.39 | 0.45 | 0.20 | -0.26 | 0.00 | 0.53 | 0.54 | 0.56 | 0.42 | 0.30 | 0.52 | 0.50 | 0.41 | -0.37 | 0.22 | 0.00 | 0.44 | 0.45 | -0.17 | 1.00 | 0.01 | 0.05 | 0.16 |

**Table 1:** Correlation coefficient matrix of selected indicators from Customs officials survey – Country X

**Table 2:** Correlation coefficient matrix of selected indicators from private sector survey – Country Y
With correlation coefficients, it is straightforward to observe which indicators are related to which. As a rule of thumb, the commonly used scale for interpreting the strength of a correlation is:

- 0.00 to ±0.19: Very weak
- ±0.20 to ±0.39: Weak
- ±0.40 to ±0.59: Moderate
- ±0.60 to ±0.79: Strong
- ±0.80 to ±1.00: Very strong

In the CIPS, indicators from the same module are often more strongly correlated. This is the inevitable result of each module, through its indicators, analyzing different aspects of how a Customs administration adheres to the Revised Arusha Declaration.

8.5. STATISTICAL MODELLING

The focal point in interpreting CIPS results lies in understanding the rationale behind the reactions of specific respondent groups. It is only natural to inquire whether demographic factors such as gender, years of experience, and leadership roles exert an influence on these outcomes. Additionally, an exploration is underway to understand potential associations between respondents’ answers to specific indicators.

Utilizing descriptive statistics can be useful first step in gaining an immediate insight into the distribution of demographic variables within the CIPS sample. However, using descriptive statistics, we can only observe the differences without understanding whether there is a valid relationship that exists between certain indicators, or whether the relationship is strong enough so that it would persist when the survey is repeated.

The correlation coefficients discussed in section 8.4 can be used to quantitatively assess to what extent the relationship between a pair of indicators exists. The limitation of correlation lies in the inability in understanding the relationship of more than 2 indicators.

Regression analysis is a statistical method used to model the relationship between one or more independent variables (predictors) and a dependent variable (outcome). The primary goal is to understand how changes in the independent variables are associated with changes in the dependent variable.

Ordered Logistic Regression, also known as the proportional odds model, is a type of regression analysis specifically designed for modeling ordinal outcomes. The proportional odds assumption is a key characteristic of the model. It posits that the odds of moving from one category to a lower category (or staying in the same category) are proportional across all levels of the independent variables.

The model uses a cumulative log-odds link function. It estimates the cumulative probability of observing an outcome up to a certain category. The logits (log-odds) are then modeled as linear functions of the predictor variables.

Coefficients in Ordered Logistic Regression represent the change in the log-odds of an observation being in a lower or the same category versus a higher category, given a one-unit change in the predictor variable.

In one example of modelling the CIPS data (categorical variables are encoded according to section 8.3 of the Guidelines), the target variable is set as the indicator from Audit & Investigation Q6a:

- I feel safe enough to report integrity violations
  - 1 Strongly agree
  - 2 Somewhat agree
  - 3 Somewhat disagree
  - 4 Strongly disagree

By setting a threshold of 0.4 for the correlation coefficients with Q6a, a batch of indicators can be filtered as the independent variables to feed in the Ordered Logistic Regression, and eventually kept in the model based on the significance threshold of 0.05 in p-values to be statistically significant in predicting the outcome.

Evaluating the fitness or goodness-of-fit of an Ordered Logistic Regression model involves assessing how well the model aligns with the observed data. In this study, the AIC (Akaike Information Criterion) is used for comparing different models with the addition or subtraction of variables. Lower values indicate better-fitting models, but these criteria may be more informative in comparing models rather than standalone fitness indicators.

Based on the AIC, the following indicators are kept in the model to obtain the maximum fitness.
Each coefficient represents the change in the log-odds of being in a lower (or the same) category compared to a higher category, given a one-unit change in the predictor variable. A positive coefficient for a predictor variable suggests that an increase in that variable is associated with higher odds of being in a lower (or the same) category compared to a higher category.

In this study, all the coefficients are positive, suggesting that when respondents choose a higher category from the indicators listed above, they are likely to choose a higher category for the indicator Q6a.

The magnitude of the coefficients indicates the strength of the association. Indicator Q1f “I feel encouraged by my supervisor(s) to report integrity violations” has the greatest magnitude, and thus the strongest association with indicator Q6a.

Conclusions: the modelling exercise presented demonstrates how to further comprehend the CIPS results. In this case, the target indicator “perception of whistleblowing protection” is influenced by several indicators from multiple modules of the survey, such as the perceived encouragement of supervisors to report corruption, involvement in modernization programs of the administration, fair investigation of corruption reports, and the ethical standards in the administration. This confirms the cross-cutting nature of integrity, and the importance of considering multiple key factors of the Revised Arusha Declaration for any integrity initiatives to be effective.

<table>
<thead>
<tr>
<th>Indicators</th>
<th>Coefficients</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q1c  The Customs administration’s top management sets a positive example when it comes to integrity.</td>
<td>1.11</td>
</tr>
<tr>
<td>Q1d  My role and expected behaviours within Customs administration are clear.</td>
<td>1.13</td>
</tr>
<tr>
<td>Q1e  I know the procedure to report integrity violations in my Customs administration</td>
<td>1.11</td>
</tr>
<tr>
<td>Q1f  I feel encouraged by my supervisor(s) to report integrity violations.</td>
<td>1.45</td>
</tr>
<tr>
<td>Q2a  In general, the current regulatory framework for Customs effectively decreases the risk of corruption and integrity violations.</td>
<td>1.15</td>
</tr>
<tr>
<td>Q2d  I feel encouraged by my supervisor(s) to provide feedback on the effectiveness of Customs regulations.</td>
<td>1.11</td>
</tr>
<tr>
<td>Q2e  My supervisor(s) will take action on my feedback to improve the effectiveness of Customs regulations.</td>
<td>1.11</td>
</tr>
<tr>
<td>Q5a  I feel involved in Customs modernisation programmes to promote integrity.</td>
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<td>Q5b  There are less opportunities for corruption because of Customs modernization programs to promote integrity.</td>
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<tr>
<td>Q6b  Reports of corrupt behaviour in my Customs administration result in action against that behaviour.</td>
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<tr>
<td>Q6c  Reports of corruption in my administration are investigated in a fair manner.</td>
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<tr>
<td>Q7d  The code of conduct is applied in a fair manner.</td>
<td>1.13</td>
</tr>
<tr>
<td>Q9b  Overall, there are high ethical standards in my Customs administration.</td>
<td>1.27</td>
</tr>
</tbody>
</table>
9. Quality assurance guidelines of the CIPS implementation

It is important for any survey to have quality standards in place and procedures to monitor whether these standards are met. Implementing parties executing the CIPS should have a routinized quality assurance system as a standard element of their services and should be able to provide details on how they aim to guarantee the quality of the CIPS. Likewise, the survey organizer (e.g., WCO or local Customs administrations) are advised to set clear quality objectives as well at the start of a project, and to take the necessary precautions to allow for these objectives to be reached.

Important elements of such a system are the following:

• The survey organizer should clearly define the objectives of the survey towards any external partner involved in the survey and should determine the criteria for adequate delivery of services that these partners need to meet. This most importantly includes a clear agreement on the format and content of any deliverables (e.g., datafiles and reports).

• Ideally, any third party hired to execute the survey have proven experience with fieldwork in the target country, as well as with surveying public sector officials and/or enterprises.

• At the start of the project, the survey organizer and survey implementor should agree on a detailed timeline which includes all milestones (e.g., fieldwork start and estimated end) and deliverables.

• In case of an integrated survey, procedures should be agreed with the main survey organizer so that the CIPS organizer can remain up to date on the development and progress of the main survey.

• Survey materials should always be reviewed by native speakers of the language used before being used in fieldwork.

• External survey implementors executing the CIPS fieldwork should be able to show how they train and brief their fieldwork staff (if any is involved in the fieldwork).

• The main fieldwork should be preceded by a pilot test to verify whether the survey materials, the fieldwork infrastructure and the data collection system are all working as envisaged.

• An external survey implementor should have a system in place to control the quality of the data (and, if applicable, the performance of interviewers), and should be able to present to the survey organizer the results of such quality control.

• Both the survey organizer and any external survey implementor should adhere to local data protection and privacy regulations when it comes to the treatment of personal data and the assurance of anonymity of respondents.
The CIPS was initiated under the WCO’s flagship Anti-Corruption and Integrity Promotion (A-CIP) Programme for Customs. Started in 2019 with funding from the Norwegian Agency for Development Cooperation (Norad), the A-CIP Programme is the WCO’s first multi-annual programme of technical assistance capacity building (TACB) support for 17 WCO Member administrations seeking to implement initiatives in line with the WCO Revised Arusha Declaration. In 2021, with additional funding from Canada, the Programme expanded to include 8 additional administrations from the AMS region as its partners.

The Programme follows a results-based management methodology, and as such a results indicator framework forms an integral part. In line with international best practice, a hybrid approach was chosen that includes a number of different measurement methods, including more detailed and qualitative integrity assessment using the WCO Integrity Development Guide (IDG) as well as the CIPS.

The CIPS was implemented in all 25 A-CIP Partner Administrations. 18 of them also chose to carry out an interim survey before the final survey at the end of the Programme’s. To date, the CIPS has successfully collected extensive data from over 20,000 respondents that was used by each Customs administration to:

- Create baseline indicators by which they could measure their progress following specific interventions under the A-CIP Programme.
- Provide broader insights on the perceptions of Customs officials and private sector.

Following the CIPS Methodological Guidelines, the A-CIP Programme selected the following approach.

Target population – the Pilot targeted the two broadly defined groups used for the development of CIPS. Customs administration employees, and Private sector stakeholders.

- Customs officials were defined as those officials within the administration involved directly in Customs operations and administration. This definition was also applied in administrations where Customs duties were combined with other areas, such as domestic tax, or military and security duties. Total population data (segmented by gender and location) was provided by the participating Customs administrations themselves.
- Private Stakeholders considered as relevant were privately owned entities based in the participating countries, which are presumed to interact with Customs agencies as part of their business operations (e.g. through the import
and/or export of goods). Due to lack of sufficient data on the private sector stakeholders held by the participating Customs administrations, the identification of the total target population was performed by extraction from an international database, processed, cleaned and mapped to the different participating countries and business industries. The resultant target populations where then reviewed and validated by the participating Customs administrations.

**Sample sizes** – From the total populations identified, target sample sizes were calculated. The definition of the sample for both Customs officials and the private sector stakeholders was calculated using the following formula:

\[
\frac{z^2xp(1-p)}{e^2} + 1 + \left(\frac{z^2xp(1-p)}{e^2N}\right)
\]

where

- \(z\) = z-score (1.96 for a 95% confidence level)
- \(p\) = sample proportion (0.5 used)
- \(e\) = margin of error
- \(N\) = total population size

The sample was calculated separately for Customs officials and private sector stakeholders in the participating countries for a 95% confidence level and 4% margin of error.

**Indicators and questions selected** – for the iterations of the CIPS under the A-CIP Programme, it was decided to include all indicators and questions from both surveys for the Private Sector and Customs officials. While the Guidelines point out some potential risks to data quality due to length/ burden of the survey, efforts to mitigate these risks were made in choice of survey mode. With the chosen mode, it was found during testing that the survey would take respondents 10-15 minutes to complete. The questions were translated into eight different local languages for the participating countries. Cognitive testing was conducted to ensure meanings were not lost in translation. Where more than one official language existed, respondents had the option to select their preference.

**Survey Mode** - the survey mode chosen was a hybrid (or supervised) mode of computer-assisted interviews (supervised CAWI). Specially encrypted computer tablets, Mobile Survey Stations (MSS), were used to display the questionnaires and record answers, supervised by a third party. The surveys were administered over the course of 3-4 weeks in selected Customs Office locations, chosen for their strategic importance with regards to the potential impact of corruption as well as volume of interaction between Customs officials and private sector, as required to achieve the target sample sizes. The survey questions were encoded into the MSS in a way such that respondents could not move on to the next section without providing answers to all questions on the page. This helped ensure a 100% completion rate.

Confidentiality and sensitivity - the respondents were invited to complete the survey by the independent third party, who validated their eligibility for the sample frame by ID. Once validated, the respondent was given a single-use token to use the MSS to complete the survey anonymously.

Communications - an awareness-raising campaign for the CIPS was launched in each country in the months prior to the on-the-ground implementation. Communications were sent within each participating Customs administration to inform officers and encourage participating, as well as to private sector associations such as Chambers of Commerce and brokers associations. Flyers and posters were also displayed in the target Customs offices and locations.

**Demographic questions** – a few questions were selected to provide some ways to cross-cut the data:

**Questionnaire for customs officials:**

1. Indicate if you are a:
   - Man
   - Woman
   - Other

2. Indicate the number of years of experience in the customs administration:
   - 0 - 5
   - 6 - 15
   - 16 and more

3. Indicate if you supervise employees (responsible for performance management, discipline, reward, change management, etc.):
   - No
   - Yes

**Questionnaire for private sector stakeholders:**

1. Indicate if you are a:
   - Man
   - Woman
   - Other

2. Indicate the number of years of experience with customs processes for import or export:
   - 0 - 5
   - 6 - 15
   - 16 and more
These questions were carefully chosen in order to provide some distinguishing factors among respondents that could be useful for later data analysis, while being broad enough to maintain sense of anonymity for respondents.

Data sharing - the data collected from the MSS was encrypted and transferred within a closed network for later data extraction. Several protocols were put into place in order to ensure the integrity of the data. Initial data analysis was conducted by using a Microsoft SQL server. Each participating Customs administration was provided with a CSV file containing the complete data sets that could then be utilised by their own internal analysts using preferred data analysis tools. Experts from the WCO A-CIP Programme Team worked with each administration to provide a summary analysis of the data from the perspective of the A-CIP Programme and Customs administration’s own strategic priorities.

Performance Analysis Framework - taking advantage of CIPS use of a four-point Likert scale in the majority of questions (38 out of 41 in the Customs survey and 28 out of 29 in the Private Sector survey), a performance analysis scoring framework was produced for the CIPS results and a series of baseline scores for target areas was developed. Spider diagrams were also used to visualise the scores for groups of indicators under certain key factors. These could then also be used to visualize changes in scores between iterations of surveys, for example:
In producing the analysis framework, the following considerations were made:

- Mean vs. Median - there is not the same explicit difference between each variable response for ordinal versus continuous values. This poses some questions re. calculating averages. Both median and mean values have been tested on CIPS responses. Median values provide similar conclusions as to the current state but do not provide nuanced enough results so mean values have been used in the score calculations.
- Exclusions in the Calculation - the four questions (3/41 Customs and 1/29 Private Sector) that provided nominal vs. ordinal variables were excluded from the calculations for performance measurement purposes. Responses to these questions will be analysed separately.
- Exceptions in the Calculation - Response score values for the scenario test questions have been determined on the basis of consultation and sensitivity analysis.
- Comparability of Questions - It is important to note that this combination of responses to different questions to create aggregate scores has some flaws as the variables are not exactly comparable in relation to importance and impact on corruption.
- Aspirational bias - It should be considered that there could be an aspirational response for CIPS, although anonymity was intended to mitigate this, the fact that the surveys were delivered in Customs' facilities, with support of the administrations might lead to more aspirational responses from Customs officers in particular.
- Targets - Targets for scores by the end of the A-CIP Programme were initially set to reflect an 80% improvement across all survey responses but this became a challenge to apply to the scoring framework that was eventually developed for the survey. A lesson learned from this was, given that changes in perceptions take time, a more valuable target was a positive direction of change, rather than a specific score.

CONCLUSIONS AND LESSONS LEARNED FROM THE IMPLEMENTATION OF CIPS IN THE A-CIP PROGRAMME

Overwhelmingly, the implementation of the CIPS under the A-CIP Programme was successful and provided the data and insights necessary to meet the objectives of the survey that was to assess in a quantitative way how Customs administrations employees and private sector stakeholders individually perceive, the level of integrity in Customs administrations.

While the chosen survey mode, supervised CAWI, was a very resource-intensive exercise, the inputs were deemed worthwhile for the quality of the data collected. One million data points were collected from over 20,000 Customs official and private sector respondents across the 25 participant countries. The targets of 95% confidence level and 4% margin of error were maintained in almost all cases.

The data collected from the CIPS administered under the WCO A-CIP Programme belongs first and foremost to each of the participating Customs administrations, who will use the findings in each country’s results indicator framework guiding WCO A-CIP Programme-supported interventions. Each administration is also encouraged to share important results and insights from the survey with stakeholders, both internal and external, particularly the private sector. This can help support collective action in responding to integrity and corruption in Customs administration and ensure everyone takes appropriate accountability.

The CIPS as implemented under the A-CIP Programme is not and was never intended to be used in cross-country comparison, or to create a rankings index. Nevertheless, because all participant countries under the A-CIP Programme are implementing CIPS in a standardized manner, it also offers an opportunity to analyse aggregate data, anonymized so country-specific details are removed, to identify statistically significant trends and correlations across indicators. Findings and insights from these broader data analysis exercises may be useful to all WCO Members.
1. LEADERSHIP & COMMITMENT

To what extent do you agree or disagree with the following statements:

Q1a. In general, achieving a high level of integrity is considered a priority within the administration.
   - 1 Strongly agree
   - 2 Somewhat agree
   - 3 Somewhat disagree
   - 4 Strongly disagree

Q1b. My direct supervisor(s) sets a positive example when it comes to integrity.
   - 1 Strongly agree
   - 2 Somewhat agree
   - 3 Somewhat disagree
   - 4 Strongly disagree

Q1c. The Customs administration’s top management sets a positive example when it comes to integrity.
   - 1 Strongly agree
   - 2 Somewhat agree
   - 3 Somewhat disagree
   - 4 Strongly disagree

Q1d. My role and expected behaviours within Customs administration are clear.
   - 1 Strongly agree
   - 2 Somewhat agree
   - 3 Somewhat disagree
   - 4 Strongly disagree

Q1e. I know the procedure to report integrity violations in my Customs administration.
   - 1 Strongly agree
   - 2 Somewhat agree
   - 3 Somewhat disagree
   - 4 Strongly disagree
ANNEX 1. QUESTIONNAIRE FOR CUSTOMS OFFICIALS

Q1f. I feel encouraged by my supervisor(s) to report integrity violations.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q1g. My supervisor is taking action to promote integrity.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

2. REGULATORY FRAMEWORK

To what extent do you agree or disagree with the following statements:

Q2a. In general, the current regulatory framework for Customs effectively decreases the risk of corruption and integrity violations.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q2b. Customs regulations are so complex that I find it difficult to administer them in my job at all times.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q2c. I ignore Customs regulations because they are too complex.
- 1 Always
- 2 Often
- 3 Sometimes
- 4 Never

Q2d. I feel encouraged by my supervisor(s) to provide feedback on the effectiveness of Customs regulations.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q2e. My supervisor(s) will take action on my feedback to improve the effectiveness of Customs regulations.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

3. TRANSPARENCY

To what extent do you agree or disagree with the following statements:

Q3a. I feel sufficiently informed about the standard procedures I need to follow in my day-to-day work with clients.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q3b. When a supervisor asks to deviate from standard procedures, I feel sufficiently informed about why this is necessary.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree
ANNEX 1. QUESTIONNAIRE FOR CUSTOMS OFFICIALS

4. AUTOMATION

To what extent do you agree or disagree with the following statements:

Q4a. I feel sufficiently trained to use the computerized systems in the administration.
○ 1 Strongly agree
○ 2 Somewhat agree
○ 3 Somewhat disagree
○ 4 Strongly disagree

Q4b. The introduction of automated Customs systems has restricted opportunities to ignore procedures.
○ 1 Strongly agree
○ 2 Somewhat agree
○ 3 Somewhat disagree
○ 4 Strongly disagree

5. REFORM AND MODERNISATION

To what extent do you agree or disagree with the following statements:

Q5a. I feel involved in Customs modernisation programmes to promote integrity.
○ 1 Strongly agree
○ 2 Somewhat agree
○ 3 Somewhat disagree
○ 4 Strongly disagree

Q5b. There are less opportunities for corruption because of Customs modernization programs to promote integrity.
○ 1 Strongly agree
○ 2 Somewhat agree
○ 3 Somewhat disagree
○ 4 Strongly disagree

6. AUDIT & INVESTIGATION

To what extent do you agree or disagree with the following statements:

Q6a. I feel safe enough to report integrity violations.
○ 1 Strongly agree
○ 2 Somewhat agree
○ 3 Somewhat disagree
○ 4 Strongly disagree

Q6b. Reports of corrupt behaviour in my Customs administration result in action against that behaviour.
○ 1 Strongly agree
○ 2 Somewhat agree
○ 3 Somewhat disagree
○ 4 Strongly disagree
ANNEX 1. QUESTIONNAIRE FOR CUSTOMS OFFICIALS

Q6c. Reports of corruption in my administration are investigated in a fair manner.
○ 1 Strongly agree
○ 2 Somewhat agree
○ 3 Somewhat disagree
○ 4 Strongly disagree

Q6d. Imagine the following scenario. You suspect that a colleague accepts money from business to ignore procedures. How would you react? Multiple answers are possible.
○ 1 Do nothing
○ 2 Talk to the colleague about his/her behaviour
○ 3 Report immediately to direct supervisor
○ 4 Report immediately to internal investigation body
○ 5 Report immediately to external investigation body (only include this option in the questionnaire if such body exists in the country where the survey is done)

Q6e. Imagine the following scenario. A client offers you money or a gift to speed up the Customs process or to release goods without the proper documents. How would you react?
○ 1 You refuse and report the incident
○ 2 You accept the money or the gift
○ 3 You ignore the question and process according to the procedures without reporting the incident

7. CODE OF CONDUCT

Q7a. Is there a code of conduct applicable to your Customs administration?
○ 1 Yes
○ 2 No

(If Q7a= YES)

Q7c. The code of conduct is clear to me.
○ 1 Strongly agree
○ 2 Somewhat agree
○ 3 Somewhat disagree
○ 4 Strongly disagree

Q7d. The code of conduct is applied in a fair manner.
○ 1 Strongly agree
○ 2 Somewhat agree
○ 3 Somewhat disagree
○ 4 Strongly disagree

(If Q7b=YES)

To what extent do you agree or disagree with the following statements:

Q7f. The code of conduct assists me in making ethical decisions.
○ 1 Strongly agree
○ 2 Somewhat agree
○ 3 Somewhat disagree
○ 4 Strongly disagree

(If Q7a=NO)

To what extent do you agree or disagree with the following statement:

Q7g. We need a code of conduct in our Customs administration.
○ 1 Strongly agree
○ 2 Somewhat agree
○ 3 Somewhat disagree
○ 4 Strongly disagree
8. HUMAN RESOURCE MANAGEMENT

To what extent do you agree or disagree with the following statements:

Q8a. My salary is fair given my responsibilities within Customs administration.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q8b. A higher salary would decrease incentives for acting corruptly.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q8c. Recruitment and promotion in my administration are based on merit.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q8d. Integrity training in my administration helps to prevent corruption.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

9. MORALE AND ORGANISATIONAL CULTURE

To what extent do you agree or disagree with the following statements:

Q9a. I get satisfaction from doing my job.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q9b. Overall, there are high ethical standards in my Customs administration.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q9c. I feel responsible for maintaining high integrity standards within my Customs administration.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

10. RELATIONSHIP WITH PRIVATE SECTOR

To what extent do you agree or disagree with the following statements:

Q10a. My day-to-day interaction with the private sector is professional and correct
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q10b. The main mission of Customs administration is...
- 1 to exercise control on the business community
- 2 to facilitate trade
Annex 2.
Questionnaire for private stakeholders

1. LEADERSHIP & COMMITMENT

To what extent do you agree or disagree with the following statements:

Q1a. Achieving a high level of integrity is considered a priority within the Customs administration.
   ○ 1 Strongly agree
   ○ 2 Somewhat agree
   ○ 3 Somewhat disagree
   ○ 4 Strongly disagree

Q1b. Customs administration management sets a positive example when it comes to integrity.
   ○ 1 Strongly agree
   ○ 2 Somewhat agree
   ○ 3 Somewhat disagree
   ○ 4 Strongly disagree

Q1c. Customs administration management is taking action against corruption.
   ○ 1 Strongly agree
   ○ 2 Somewhat agree
   ○ 3 Somewhat disagree
   ○ 4 Strongly disagree

2. REGULATORY FRAMEWORK

To what extent do you agree or disagree with the following statements:

Q2a. The complexity of Customs regulations has a negative impact on my capability to do business.
   ○ 1 Strongly agree
   ○ 2 Somewhat agree
   ○ 3 Somewhat disagree
   ○ 4 Strongly disagree

Q2b. It is hard to follow the rules of the administration because they are too complex.
   ○ 1 Strongly agree
   ○ 2 Somewhat agree
   ○ 3 Somewhat disagree
   ○ 4 Strongly disagree

Q2c. I do not comply with the rules of the administration because they are too complex.
   ○ 1 Always
   ○ 2 Often
   ○ 3 Sometimes
   ○ 4 Never

Q2d. I know where to turn to if I want to give feedback on Customs regulations.
   ○ 1 Strongly agree
   ○ 2 Somewhat agree
   ○ 3 Somewhat disagree
   ○ 4 Strongly disagree

Q2e. Feedback from clients on Customs regulations is reflected in the decisions and/or new policies.
   ○ 1 Strongly agree
   ○ 2 Somewhat agree
   ○ 3 Somewhat disagree
   ○ 4 Strongly disagree
3. TRANSPARENCY

To what extent do you agree or disagree with the following statements:

Q3a. In general, I feel sufficiently informed about Customs regulations and charges to comply with them.

- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q3b. I feel sufficiently informed about possible sanctions when breaching Customs rules.

- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q3c. I always understand why Customs makes a specific decision about my case.

- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q3d. The same rules apply each time I deal with Customs administration regardless of the individual or the location.

- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q3e. I find it easy to get information about why a specific decision about my case was made.

- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q3f. I don't ask for information about how my case was handled because I won't get any satisfactory response.

- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

4. AUTOMATION

To what extent do you agree or disagree with the following statements:

Q4a. Automated Customs systems meet enterprises’ needs.

- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q4b. The introduction of automated Customs systems has restricted opportunities to sidestep procedures.

- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree
5. REFORM AND MODERNIZATION

To what extent do you agree or disagree with the following statements:

Q5a. Enterprises are consulted in advance of Customs reform and modernisation programmes.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q5b. (if Q5a = 1 or 2) Feedback from enterprises on reform and modernisation programmes is reflected in the decisions and/or new policies.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

6. AUDIT AND INVESTIGATION

Q6a. Have you ever been part of an integrity investigation led by Customs internal investigations?
- 1 Yes
- 2 No

IF Q6a=Yes: Q6b. To what extent do you agree with the following statement:

Q6b. My experience of this integrity investigation led by Customs internal investigations was positive.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

7. CODE OF CONDUCT

To what extent do you agree or disagree with the following statements:

Q7a. My business has a code of conduct applicable when I deal with Customs administration.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q7b. My profession has a code of conduct applicable when I deal with Customs administration.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

Q7c. A code of conduct affects positively how I deal with Customs administration.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree

8. MORALE AND ORGANIZATIONAL CULTURE

To what extent do you agree or disagree with the following statements:

Q8a. The Customs administration has a client service culture.
- 1 Strongly agree
- 2 Somewhat agree
- 3 Somewhat disagree
- 4 Strongly disagree
9. RELATIONSHIP WITH THE PRIVATE SECTOR

To what extent do you agree or disagree with the following statements:

Q9a. I feel responsible to achieve high integrity standards when dealing with Customs administration.
   ○ 1 Strongly agree
   ○ 2 Somewhat agree
   ○ 3 Somewhat disagree
   ○ 4 Strongly disagree

Q9b. I know the procedures to report instances of corruption when dealing with Customs administration.
   ○ 1 Strongly agree
   ○ 2 Somewhat agree
   ○ 3 Somewhat disagree
   ○ 4 Strongly disagree

Q9c. I feel safe enough to report instances of corruption.
   ○ 1 Strongly agree
   ○ 2 Somewhat agree
   ○ 3 Somewhat disagree
   ○ 4 Strongly disagree

Q9d. Imagine the following scenario. You are asked by a Customs official to pay a fee to speed up the Customs process. How would you react?
   ○ 1 You refuse
   ○ 2 You refuse and report the incident
   ○ 3 You pay the fee
   ○ 4 You ignore the question and ask for your case to be processed according to the procedures

Q9e. It is possible not to comply with Customs requirements through the payment of bribes.
   ○ 1 Always
   ○ 2 Often
   ○ 3 Sometimes
   ○ 4 Never

Annex 3.
List of indicators

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<thead>
<tr>
<th>Target group</th>
<th>Indicator name</th>
<th>Indicator description</th>
<th>Indicator type</th>
<th>Survey question</th>
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<td>Priority</td>
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### FACTOR 2 - REGULATORY FRAMEWORK

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<th>Indicators</th>
<th>Description</th>
<th>Measurement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customs officials</td>
<td>Effectiveness of framework</td>
<td>Employees find that the regulatory framework effectively decreases the risk of integrity violations.</td>
<td>perception  Q2a</td>
</tr>
<tr>
<td>Compliance officials</td>
<td>Red tape or complex regulations are not a burden on employees to follow the rules of the administration</td>
<td>Compliance officials find it easy/feasible to comply with Customs regulations.</td>
<td>perception  Q2b</td>
</tr>
<tr>
<td>Compliance behaviour</td>
<td>Employees do not sidestep the rules of the administration because of red tape or complex regulations</td>
<td>Compliance behaviour has a negative impact on their capability to do business.</td>
<td>behaviour  Q2c</td>
</tr>
<tr>
<td>Internal feedback</td>
<td>Employees feel encouraged to provide feedback on the complexity and efficiency of Customs regulations</td>
<td>Internal feedback is implemented to improve regulations.</td>
<td>perception  Q2d</td>
</tr>
<tr>
<td>Internal feedback useful</td>
<td>Employees feel that their feedback is useful to improve regulations</td>
<td>Internal feedback useful is implemented to improve regulations.</td>
<td>perception  Q2e</td>
</tr>
<tr>
<td>Private stakeholders</td>
<td>Impact red tape</td>
<td>Private stakeholders feel that red tape has a negative impact on their capability to do business.</td>
<td>perception  Q2a</td>
</tr>
<tr>
<td>Compliance</td>
<td>Private stakeholders find it easy/feasible to comply with Customs regulations</td>
<td>Compliance has a negative impact on their capability to do business.</td>
<td>perception  Q2b</td>
</tr>
<tr>
<td>External feedback</td>
<td>Private stakeholders know where to turn to if they want to provide feedback about regulations and sanctions systems</td>
<td>Perception of feedback is implemented to improve regulations.</td>
<td>perception  Q2c</td>
</tr>
<tr>
<td>Compliance behaviour</td>
<td>Private stakeholders do not feel forced to willingly ignore regulations because of their complexity</td>
<td>Behaviour has a negative impact on their capability to do business.</td>
<td>behaviour  Q2e</td>
</tr>
<tr>
<td>External feedback useful</td>
<td>Private stakeholders feel that their feedback that their opinion on Customs regulations is reflected in decisions and/or new policies</td>
<td>External feedback useful is implemented to improve regulations.</td>
<td>perception  Q2d</td>
</tr>
</tbody>
</table>

### FACTOR 3 - TRANSPARENCY

<table>
<thead>
<tr>
<th>Stakeholders</th>
<th>Indicators</th>
<th>Description</th>
<th>Measurement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customs officials</td>
<td>Information standard</td>
<td>Employees feel sufficiently informed about the standard procedures they need to follow when handling Customs cases.</td>
<td>perception  Q3a</td>
</tr>
<tr>
<td>Information deviation</td>
<td>When asked to deviate from standard procedures, employees feel sufficiently informed about why this is necessary</td>
<td>Information deviation is implemented to improve regulations.</td>
<td>perception  Q3b</td>
</tr>
<tr>
<td>Uniformity</td>
<td>Employees make uniform decisions when dealing with Customs clients</td>
<td>Uniformity is implemented to improve regulations.</td>
<td>behaviour  Q3c</td>
</tr>
<tr>
<td>Freedom</td>
<td>Employees feel free to apply the standard procedures without inappropriate interference from other officials</td>
<td>Freedom to apply the standard procedures without inappropriate interference is implemented to improve regulations.</td>
<td>behaviour  Q3d</td>
</tr>
<tr>
<td>Private stakeholders</td>
<td>Information regulations</td>
<td>Private stakeholders feel sufficiently informed about Customs regulations and fees/charges to comply with them.</td>
<td>perception  Q3a</td>
</tr>
<tr>
<td>Information sanctions</td>
<td>Private stakeholders feel sufficiently informed about possible sanctions</td>
<td>Information sanctions is implemented to improve regulations.</td>
<td>perception  Q3b</td>
</tr>
<tr>
<td>Clarity</td>
<td>It is always clear to private stakeholders why their case was handled by Customs in the way it was</td>
<td>Clarity is implemented to improve regulations.</td>
<td>perception  Q3c</td>
</tr>
<tr>
<td>Predictability</td>
<td>Private stakeholders find that the same rules and procedures apply each time they deal with Customs officials/ administrations regardless of individual and location</td>
<td>Predictability is implemented to improve regulations.</td>
<td>perception  Q3d</td>
</tr>
<tr>
<td>Feedback</td>
<td>Private stakeholders find it easy to get information or a review about why a specific decision about their case was made</td>
<td>Feedback is implemented to improve regulations.</td>
<td>perception  Q3e</td>
</tr>
<tr>
<td>Feedback behaviour</td>
<td>Private stakeholders are not put off about asking information about how their case was handled because they think it won't yield results</td>
<td>Feedback behaviour is implemented to improve regulations.</td>
<td>behaviour  Q3f</td>
</tr>
</tbody>
</table>
### FACTOR 4 - AUTOMATION

**Customs officials**
- **Training**: Employees feel sufficiently trained to use the computerized systems in the administration
  - perception Q4a

**Internal Sidestepping**: The introduction of automated systems has restricted opportunities to ignore procedures
  - behaviour Q4b

**Private stakeholders**
- **Automation needs**: Automated/computerized Customs systems meet private stakeholders’ needs
  - perception Q4a

**External Sidestepping**: The introduction of automated systems has restricted opportunities to sidestep procedures
  - behaviour Q4b

### FACTOR 5 - REFORM AND MODERNIZATION

**Customs officials**
- **Ownership**: Employees have a strong sense of ownership over any reform and modernisation programme
  - perception Q5a

**Sidestepping**: Employees feel that reform and modernisation programmes have restricted opportunities for corruption
  - behaviour Q5b

**Private stakeholders**
- **Reform needs**: Private stakeholders were consulted in advance of reform and modernisation programmes
  - perception Q5a

**Impact**: Private stakeholders feel that their feedback on reform and modernisation programmes is reflected in the decisions and/or new policies
  - perception Q5b

### FACTOR 6 - AUDIT AND INVESTIGATION

**Customs officials**
- **Whistleblowing**: Employees feel safe enough to disclose corruption/wrongdoing
  - perception Q6a

**Action**: Disclosures of corruption/wrongdoing result in action
  - perception Q6b

**Fair system**: Disclosures of corruption/wrongdoing are dealt with in a fair manner
  - perception Q6c

**Whistleblowing colleagues**: Employees disclose corrupt behaviour of colleagues when aware of it
  - behaviour Q6d

**Whistleblowing clients**: Employees report instances where clients offer to pay bribes to sidestep procedures
  - behaviour Q6e

**Private stakeholders**
- **Investigation experience**: Private stakeholders feel that their experience with integrity investigation is positive
  - perception Q6b

### FACTOR 7 - CODE OF CONDUCT

**Customs officials**
- **Code of conduct awareness**: Employees know whether a code of conduct applies to them
  - perception Q7a

**Penalty system awareness**: Employees know whether a sanction system exists in case they breach the code of conduct
  - perception Q7b

**Code of conduct clarity**: Employees feel that the code of conduct is clear
  - perception Q7c

**Code of conduct fairness**: Employees feel that the code of conduct is applied fairly
  - perception Q7d

**Penalty system efficiency**: The code of conduct (penalty system) deters officers from corruption
  - behaviour Q7e
### ANNEX 3. LIST OF INDICATORS

<table>
<thead>
<tr>
<th>Code of conduct decisions</th>
<th>Employees feel that the code of conduct assists them in making ethical decisions</th>
<th>perception</th>
<th>Q7f</th>
</tr>
</thead>
<tbody>
<tr>
<td>Code of conduct need</td>
<td>Employees feel that Customs administration needs a code of conduct</td>
<td>perception</td>
<td>Q7g</td>
</tr>
<tr>
<td>Code of conduct</td>
<td>Businesses feel subject to a code of conduct (if there is one)</td>
<td>perception</td>
<td>Q7a</td>
</tr>
<tr>
<td>Code of conduct behaviour</td>
<td>Employees feel subject to a code of conduct (if there is one)</td>
<td>perception</td>
<td>Q7b</td>
</tr>
<tr>
<td>Code of conduct behaviour</td>
<td>Private stakeholders are impacted positively by a code of conduct</td>
<td>perception</td>
<td>Q7c</td>
</tr>
</tbody>
</table>

#### FACTOR 8 - HUMAN RESOURCE MANAGEMENT

<table>
<thead>
<tr>
<th>Fair salary</th>
<th>Salary is seen as sufficiently high in relation to the responsibilities of the job</th>
<th>perception</th>
<th>Q8a</th>
</tr>
</thead>
<tbody>
<tr>
<td>Salary impact</td>
<td>Employees believe that a higher salary would decrease incentives for corruption</td>
<td>perception</td>
<td>Q8b</td>
</tr>
<tr>
<td>Fair merit system</td>
<td>Recruitment, appraisal and promotion in the administration are based on merit</td>
<td>perception</td>
<td>Q8c</td>
</tr>
<tr>
<td>Integrity training</td>
<td>Training/professional development succeed in increasing the sense of integrity</td>
<td>perception</td>
<td>Q8d</td>
</tr>
</tbody>
</table>

#### FACTOR 9 - MORALE AND ORGANISATIONAL CULTURE

<table>
<thead>
<tr>
<th>Employee high morale</th>
<th>Morale among employees is high</th>
<th>perception</th>
<th>Q9a</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employee standards</td>
<td>The Customs administration is seen to achieve high standards/ethics</td>
<td>perception</td>
<td>Q9b</td>
</tr>
</tbody>
</table>

#### FACTOR 10 - RELATIONSHIP WITH THE PRIVATE SECTOR

<table>
<thead>
<tr>
<th>Responsibility</th>
<th>Personnel feel personally responsible to maintain high standards/ethics</th>
<th>perception</th>
<th>Q9c</th>
</tr>
</thead>
<tbody>
<tr>
<td>Private stakeholders</td>
<td>Customer-oriented</td>
<td>perception</td>
<td>Q9a</td>
</tr>
<tr>
<td>Custom officials</td>
<td>Harmonious interaction</td>
<td>perception</td>
<td>Q10a</td>
</tr>
<tr>
<td>Mission control</td>
<td>Employees feel that the mission of Customs administration is to exercise control on the business community</td>
<td>perception</td>
<td>Q10b.1</td>
</tr>
<tr>
<td>Mission facilitate trade</td>
<td>Employees feel that the mission of Customs administration is to facilitate trade</td>
<td>perception</td>
<td>Q10b.2</td>
</tr>
<tr>
<td>Private stakeholders</td>
<td>Enterprise standards</td>
<td>perception</td>
<td>Q10a</td>
</tr>
<tr>
<td>Whistleblowing external channels</td>
<td>Private stakeholders are aware of how to disclose corruption/wrongdoing</td>
<td>perception</td>
<td>Q10b</td>
</tr>
<tr>
<td>Whistleblowing external protected</td>
<td>Private stakeholders feel that it is possible to safely disclose corruption/wrongdoing</td>
<td>perception</td>
<td>Q10c</td>
</tr>
<tr>
<td>Whistleblowing external</td>
<td>Private stakeholders report corruption/wrongdoing when aware of it</td>
<td>behaviour</td>
<td>Q10d</td>
</tr>
<tr>
<td>Sidestepping external</td>
<td>Private stakeholders feel that it is not possible to sidestep procedures through the payment of bribes</td>
<td>behaviour</td>
<td>Q10e</td>
</tr>
</tbody>
</table>
With initial financing from the Norwegian Agency for Development Cooperation (Norad), and additional funding from Canada, the Anti-Corruption and Integrity Promotion (A-CIP) Programme currently supports WCO Members in their efforts to combat corruption and promote integrity. The Programme aims at improving the business and law enforcement environment for cross-border trade in selected WCO member countries by making changes to the operational and administrative context that restricts corrupt behavior and promotes good governance in Customs services.