Building a Systemic Integrity Model: Lessons from Australia's Anti-Corruption and Integrity Reforms under the Open Government Partnership

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ABSTRACT

This study examines how Australia's Open Government Partnership National Action Plan 2023–2025 operationalizes transparency, accountability, and integrity through a coherent governance framework. Moving beyond compliance-oriented transparency, Australia's Open Government Partnership commitments integrate ethical norms, institutional coordination, and participatory accountability to construct a Systemic Integrity Governance Model. Using a theory-guided qualitative approach, this research analyzes policy documents, Open Government Partnership progress reports, and government integrity frameworks to identify the systemic linkages among openness, integrity, and anti-corruption mechanisms. The findings reveal that the five commitments, integrity strategy for the commonwealth public sector, beneficial ownership requirements, integrity and accountability in procurement and grants, public sector whistleblower protections, and transparent political donations and advertising, collectively form an integrated governance architecture. This model embeds integrity as both a moral and operational principle, aligning ethical conduct with institutional performance. The study contributes to the theory of open government by conceptualizing Systemic Integrity Governance as an evolutionary stage where transparency, integrity, and participation function as interdependent mechanisms for sustainable public trust and democratic resilience.

Keywords: anti-corruption, Australia, open government partnership

ABSTRAK

Studi ini mengkaji bagaimana Rencana Aksi Nasional Kemitraan Pemerintahan Terbuka Australia 2023–2025 mengoperasionalkan transparansi, akuntabilitas, dan integritas melalui kerangka tata kelola yang koheren. Melampaui paradigma transparansi yang berorientasi pada kepatuhan, komitmen Australia dalam Open Government Partnership mengintegrasikan norma etika, koordinasi kelembagaan, dan akuntabilitas partisipatif untuk membangun model tata kelola integritas sistemik. Dengan menggunakan pendekatan kualitatif berbasis teori, penelitian ini menganalisis dokumen kebijakan, laporan kemajuan Open Government Partnership, dan kerangka integritas pemerintah guna mengidentifikasi keterkaitan sistemik antara keterbukaan, integritas, dan mekanisme antikorupsi. Temuan penelitian menunjukkan bahwa lima komitmen: strategi integritas untuk sektor publik Persemakmuran, persyaratan kepemilikan manfaat, integritas dan akuntabilitas dalam pengadaan serta hibah, perlindungan pelapor pelanggaran di sektor publik, serta transparansi donasi politik dan iklan, secara kolektif membentuk arsitektur tata kelola yang terintegrasi. Model ini menempatkan integritas sebagai prinsip moral sekaligus operasional, menyelaraskan perilaku etis dengan kinerja kelembagaan. Studi ini berkontribusi pada pengembangan teori *pemerintahan terbuka dengan mengonseptualisasikan Systemic Integrity Governance sebagai tahap evolusioner di mana transparansi, integritas, dan partisipasi berfungsi sebagai mekanisme saling bergantung untuk membangun kepercayaan publik yang berkelanjutan dan ketahanan demokratis.*

Kata Kunci: antikorupsi; Australia; kemiteraan pemerintahan terbuka

Introduction

Over the past decade, the open government movement has evolved from a normative call for transparency into a systemic framework for integrity and anti-corruption reform. Rooted in the principles of accountability, participation, and ethical governance, the open government agenda aims to transform the culture of public administration by embedding openness within institutional design and performance. (Afandi et al., 2025; Janssen & Helbig, 2018; Meijer, 2013). Since its inception in 2011, the Open Government Partnership (OGP) has served as a global platform through which participating governments commit to co-creating policies that enhance transparency, fight corruption, and strengthen public trust through civic participation. Among its founding members, Australia has developed a particularly coherent model linking open government principles with systemic integrity and anti-corruption reforms, demonstrating how transparency can evolve into a multidimensional governance capacity.

Australia's participation in the OGP National Action Plan (NAP) 2023–2025 reflects a notable transformation in its governance approach, from compliance-oriented transparency to the institutionalization of integrity as a structural and ethical norm. The plan operationalizes openness across multiple policy domains, including public sector ethics, corporate accountability, political finance, and public procurement. Specifically, the five OGP commitments, integrity strategy for the commonwealth public sector, new beneficial ownership requirements, integrity and accountability in procurement and grants, public sector whistleblower protections, and transparent political donations and advertising, collectively construct a governance architecture in which transparency, accountability, and integrity are integrated rather than fragmented. (Department of the Prime Minister and Cabinet, 2023). Through these initiatives, Australia demonstrates that open government is not only about access to information but also about institutional learning, ethical resilience, and systemic coherence in anti-corruption policy.

From a theoretical standpoint, this development resonates with three interconnected frameworks: good governance, institutional integrity, and collaborative governance. The good governance paradigm emphasizes transparency, rule of law, and accountability as cornerstones of effective institutions (United Nations Development Programme, 1997; World Bank, 1992). However, scholars have noted that transparency alone cannot ensure ethical conduct or public trust unless embedded in an integrity-based institutional culture (L. W. J. C. Huberts, 2018; Menzel, 2015). The institutional integrity framework, therefore, provides a deeper analytical lens by linking ethical norms with administrative systems, ensuring that public organizations align their operations with moral and democratic values (L. W. J. C. Huberts, 2018; Sampford, 2010). Meanwhile, collaborative governance underscores the participatory dimension of integrity by promoting shared responsibility among state and non-state actors in achieving accountability and public value (Ansell & Gash, 2008; Emerson & Nabatchi, 2015). Together, these frameworks conceptualize integrity as both a moral principle and a systemic mechanism that sustains openness and accountability within complex governance systems.

Within this context, Australia's OGP commitments represent an advanced form of systemic integrity governance, a model that integrates anti-corruption strategies with open government principles through institutional coordination, data-driven oversight, and civic engagement. This study, therefore, seeks to examine how the implementation of the OGP National Action Plan 2023–2025 reflects the construction of such a systemic integrity model. Using a theory-guided qualitative analysis approach (Fereday & Muir-Cochrane, 2006). The research integrates conceptual and empirical insights to explore how transparency mechanisms, integrity frameworks, and participatory tools interact to strengthen ethical governance.

The study aims to answer three interrelated questions: (1) How are the principles of openness, integrity, and accountability operationalized in Australia's OGP commitments? (2) How do these policies collectively contribute to building a systemic integrity model that transcends sectoral boundaries? and (3) What theoretical insights can be derived to refine the conceptual framework of Open Integrity Governance, which situates transparency as a functional capacity embedded in institutional ethics rather than a mere procedural ideal? By addressing these questions, this research contributes both theoretically and practically to understanding how open government initiatives can evolve into comprehensive integrity ecosystems. The Australian experience offers valuable lessons for policymakers and scholars seeking to design anti-corruption reforms that are not only transparent but also institutionally coherent, ethically grounded, and democratically sustainable.

Method

This study employs a theory-guided qualitative approach. (Fereday & Muir-Cochrane, 2006) to analyze how Australia's Open Government Partnership National Action Plan 2023–2025 operationalizes openness, integrity, and accountability within a systemic integrity governance framework. The approach integrates deductive theoretical framing, based on good governance (United Nations Development Programme, 1997; World Bank, 1992), institutional integrity (L. W. J. C. Huberts, 2018; Sampford, 2010), and collaborative governance (Ansell & Gash, 2008; Emerson & Nabatchi, 2015), with inductive thematic analysis of empirical data from official documents and policy reports. Rather than testing a hypothesis, this method seeks to build an interpretive model explaining how open government mechanisms evolve into integrity-based governance systems. This design is appropriate for examining complex administrative phenomena involving multiple actors, values, and institutional interactions (Braun & Clarke, 2019; Yin, 2018).

Data were collected primarily from documentary and policy sources, which provide the official and empirical basis for analysis. Three categories of data were utilized. The first includes primary policy documents, such as Australia's Open Government Partnership National Action Plan 2023–2025 (Department of the Prime Minister and Cabinet, 2023), the Independent Reporting Mechanism (IRM) Progress Reports (Open Government Partnership, 2024), and public consultation summaries available through the OGP portal. The second includes institutional and regulatory frameworks relevant to integrity and anti-corruption governance, including the Commonwealth Integrity Strategy 2020–2023 (Australian Public Service Commission, 2021), the Public Sector Ethics Framework (Australian Public Service Commission, 2022), Procurement Integrity and Transparency Guidelines (Department of Finance, 2022), and reports from oversight agencies such as the Australian National Audit Office (Australian National Audit Office, 2022) and the National Anti-Corruption Commission (2023). The third comprises secondary and scholarly literature, including peer-reviewed articles and analytical papers discussing open government, integrity systems, and accountability reforms in Australia and other OECD contexts (Davies, 2020; Meijer, 2013; Organisation for Economic Co-operation and Development, 2022; Worthy, 2015). Data selection followed a purposive sampling strategy (Palinkas et al., 2015), ensuring that the materials analyzed directly address transparency mechanisms, institutional integrity structures, and participatory processes relevant to systemic integrity governance. All sources were obtained from verified, open-access repositories to ensure reliability and transparency.

The analysis followed a three-phase coding process consistent with thematic and theoretical coding (Fereday & Muir-Cochrane, 2006). In the first phase, deductive framework coding applied the theoretical categories derived from Section 2, good governance, institutional integrity, and collaborative governance, to identify how transparency, accountability, and participation principles are embedded in the OGP commitments. In the second phase, inductive thematic refinement was conducted to identify emerging patterns from the data, generating new sub-themes such as “ethical alignment,” “institutional coordination,” “civic oversight,” and “integrity learning systems.” In the third phase, model synthesis was undertaken to integrate theoretical and empirical insights into a conceptual representation of Systemic Integrity Governance. This model illustrates how openness instruments (e.g., beneficial ownership registry, open contracting), integrity safeguards (e.g., whistleblower protections, ethics standards), and collaborative mechanisms (e.g., multi-stakeholder forums, participatory monitoring) interact to sustain ethical and transparent governance. This process of iterative interpretation ensured that theoretical reasoning remained grounded in empirical evidence (Nowell et al., 2017).

To ensure analytical rigor, several strategies were adopted. Data triangulation (Denzin, 2012) was used to compare evidence across different document types, enhancing consistency and credibility. Reflexive memoing (Birks et al., 2008) was employed to document interpretive decisions and ensure transparency in analytical reasoning. Furthermore, peer debriefing was conducted with experts and practitioners in public integrity and OGP implementation to validate interpretive accuracy and theoretical coherence (Lincoln & Guba, 1985). These measures strengthen internal validity by aligning theoretical constructs with empirical findings and construct validity by ensuring that coding categories accurately capture the operational logic of systemic integrity governance.

The scope of this study is limited to the five commitments under the Australian OGP National Action Plan 2023–2025—integrity strategy for the commonwealth public sector, new beneficial ownership requirements, integrity and accountability in procurement and grants, public sector whistleblower protections, and transparent political donations and advertising, as these commitments collectively constitute the ethical and institutional foundation of Australia’s current integrity reform agenda. The study does not seek to evaluate implementation outcomes quantitatively or assess public perception data; rather, it focuses on understanding the governance logic and institutional mechanisms through which integrity is operationalized. Accordingly, this research provides conceptual and analytical contributions to the emerging theory of Open Integrity Governance, a framework that situates transparency not merely as procedural disclosure but as an embedded ethical capacity within systemic anti-corruption and accountability reforms.

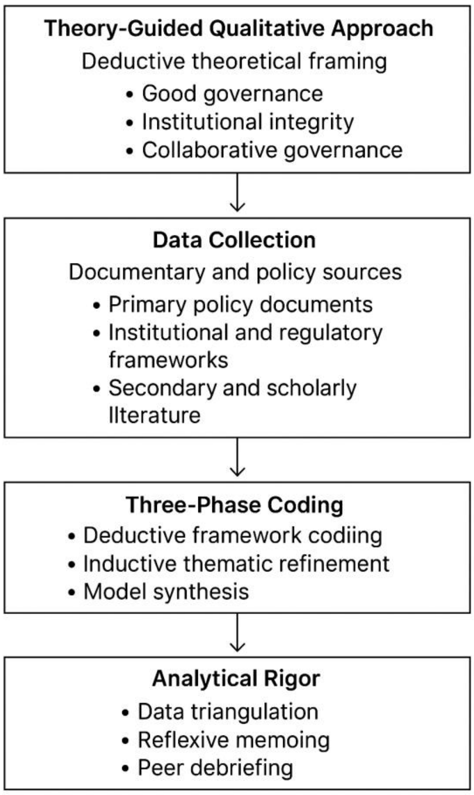

Figure 1. Research method flowchart

Results and Discussion

Australia's Open Government Partnership National Action Plan 2023–2025 reflects a significant institutional effort to consolidate openness, accountability, and ethical governance into a coherent framework of systemic integrity. The five commitments outlined in the plan, Integrity Strategy for the Commonwealth Public Sector, New Beneficial Ownership Requirements, Integrity and Accountability in Procurement and Grants, Public Sector Whistleblower Protections, and Transparent Political Donations and Advertising, collectively form a comprehensive reform agenda that embeds transparency and integrity as structural and ethical norms within the public administration system (Department of the Prime Minister and Cabinet, 2023). The analysis that follows examines each commitment as a functional component of the Systemic Integrity Governance model, showing how open government principles are operationalized through institutional mechanisms, ethical frameworks, and participatory governance practices.

The Integrity Strategy for the Commonwealth Public Sector represents the ethical and institutional foundation of Australia's integrity governance framework. It seeks to promote a unified approach to ethical conduct across government agencies by establishing a comprehensive integrity management system coordinated by the Australian Public Service Commission (2021). This strategy integrates risk-based integrity planning, capacity building, and leadership accountability into the broader machinery of government. From the perspective of the institutional integrity framework (L. W. J. C. Huberts, 2018; Sampford, 2010), this commitment demonstrates the alignment between normative values, organizational systems, and societal expectations, a relationship that underpins the systemic nature of integrity governance.

The strategy operationalizes the moral dimension of good governance by embedding integrity into the administrative culture rather than treating it as a compliance exercise (Bovens et al., 2014). Through the introduction of integrity action plans, agency-specific codes of conduct, and internal reporting mechanisms, this initiative strengthens what Huberts (2018) terms “ethical coherence” within public institutions. Importantly, this commitment also enhances cross-agency coordination, linking the Australian Public Service Commission (APSC), the National Anti-Corruption Commission (NACC), and the Australian National Audit Office (ANAO) into a shared governance architecture. This networked arrangement transforms ethical integrity into a systemic function, a foundational mechanism that ensures other OGP commitments operate within a consistent moral and administrative framework.

The second commitment, New Beneficial Ownership Requirements, advances transparency in corporate governance by mandating the disclosure of ultimate beneficial owners of companies and legal entities. This initiative, led by the Australian Treasury, seeks to prevent the misuse of corporate structures for money laundering, tax evasion, and political financing (Open Government Partnership, 2024). From a theoretical standpoint, this commitment exemplifies the good governance principle of transparency as an integrity enabler (Kaufmann et al., 2015; Organisation for Economic Co-operation and Development, 2022).

Unlike earlier transparency initiatives focused on information disclosure, this reform operationalizes what Davies (2020) calls “integrity transparency”, the use of open data systems not merely to expose information but to institutionalize preventive oversight. The integration of beneficial ownership registries into Australia’s open data infrastructure transforms transparency from a passive disclosure mechanism into an active instrument of systemic accountability. It enables cross-agency and public monitoring of corporate entities, thereby linking openness with both enforcement and civic participation.

This commitment also aligns with the collaborative governance dimension of systemic integrity, as it involves coordination among the Treasury, law enforcement bodies, financial regulators, and civil society organizations advocating corporate accountability. By creating interoperable data standards and ensuring public accessibility, it demonstrates how open data can serve as a governance infrastructure that embeds integrity across the public-private boundary.

The Integrity and Accountability in Procurement and Grants commitment represents a major step toward transparency and ethical governance in public spending. Public procurement, often a high-risk area for corruption, is addressed through reforms aimed at publishing open contracting data, standardizing transparency mechanisms, and integrating integrity risk assessments into procurement decision-making (Department of Finance, 2022).

Within the institutional integrity framework, this commitment reinforces what Sampford (2010) describes as the “architecture of integrity”, the integration of ethical standards into organizational systems and procedures. It promotes preventive accountability by mandating open publication of tender processes, contract awards, and grant allocations through the AusTender and GrantConnect platforms. These platforms operationalize the open government paradigm (Meijer, 2013; Worthy, 2015) by ensuring that information flows are both accessible and actionable, allowing stakeholders to monitor potential conflicts of interest or irregularities.

This commitment embodies the systemic integrity model by aligning institutional design (procurement procedures), ethical norms (fairness and transparency), and participatory oversight (public and civil society monitoring). Through this multi-layered approach, the commitment transforms procurement from a bureaucratic process into a platform for collaborative accountability, reinforcing public trust and ethical stewardship in fiscal governance (Australian National Audit Office, 2022).

The fourth commitment, Public Sector Whistleblower Protections, strengthens legal and institutional safeguards for individuals reporting misconduct or corruption in the public sector. This initiative updates the Public Interest Disclosure (PID) Act 2013 and aligns with recommendations from the Moss Review and the NACC Integrity Framework (National Anti-Corruption Commission, 2023). In terms of theoretical relevance, this commitment exemplifies how institutional integrity and collaborative governance intersect to create a resilient integrity system grounded in ethical trust and accountability.

Whistleblower protection mechanisms are central to maintaining the moral dimension of integrity governance (L. Huberts & Lasthuizen, 2014). They operationalize accountability not through punitive enforcement alone but by fostering an environment in which ethical concerns can be safely voiced and addressed. The reform introduces standardized internal reporting channels, confidentiality safeguards, and oversight responsibilities within agencies. These institutional arrangements mirror the societal dimension of integrity described by Huberts (2018), in which public trust is sustained through credible accountability pathways.

This initiative reinforces the participatory and collaborative aspects of integrity governance. Civil society organizations and integrity commissions play a monitoring role in ensuring that whistleblower protections are effectively implemented and continuously improved. Thus, the policy reflects an integrative approach where transparency, participation, and ethical accountability function as mutually reinforcing elements of systemic integrity.

The final commitment, Transparent Political Donations and Advertising, addresses one of the most politically sensitive areas of governance, campaign finance transparency. This reform aims to increase real-time disclosure of political donations and regulate digital political advertising to prevent misinformation and undue influence in electoral processes (Department of the Prime Minister and Cabinet, 2023). This initiative illustrates how the good governance and open government frameworks converge to strengthen democratic accountability (Emerson & Nabatchi, 2015; United Nations Development Programme, 1997). By requiring enhanced transparency in political financing, the reform extends the scope of integrity governance beyond the public bureaucracy to include the political domain, thereby reinforcing the systemic coherence of Australia's integrity architecture.

In line with collaborative governance theory, this commitment fosters multi-stakeholder engagement, involving the Australian Electoral Commission, civil society watchdogs, and digital platforms in monitoring compliance and promoting public awareness. This participatory oversight transforms transparency into a shared civic responsibility, consistent with Ansell & Gash's (2008) model of co-produced governance. Thus, the reform completes the integrity governance cycle by ensuring that ethical transparency extends from administrative integrity to political accountability.

Table 1. Analytical Matrix of Australia's OGP Commitments and Systemic Integrity Governance Dimensions

OGP Commitment & Primary Agency	**Operational Mechanisms & Transparency**	**Theoretical Alignment & Analytical Frameworks**	**Systemic Impact & Governance Dimension**
Integrity Strategy for the Commonwealth Public Sector *(APSC, NACC, ANAO)*	Integrating risk-based integrity planning, agency-specific action plans, operational codes of conduct, and reinforcing leadership accountability across the administrative apparatus.	Institutional Integrity Framework (L. W. J. C. Huberts, 2018; Sampford, 2010). Aligning normative moral values with administrative design to cultivate an ethically coherent governance structure.	Ethical Coherence Transcending mere compliance-oriented compliance by institutionalizing a proactive, coordinated ethical culture across interconnected government agencies.
New Beneficial Ownership Requirements *(Australian Treasury)*	Mandating the comprehensive disclosure of ultimate beneficial owners (UBOs) of corporate entities and legal arrangements via an integrated, publicly accessible open-data registry.	Good Governance & "Integrity Transparency" Paradigms (Davies, 2020; Kaufmann et al., 2015). Transforming data transparency from a passive disclosure mechanism into an active instrument for preventive oversight.	Institutional Coordination Precluding the illicit exploitation of corporate structures for money laundering, tax evasion, or political financing, while fortifying collaborative public-private oversight.
Integrity and Accountability in Procurement and Grants *(Department of Finance)*	Standardizing open contracting data collection, real-time publication of tenders, and institutionalizing conflict-of-interest risk assessments through *AusTender* and *GrantConnect* platforms.	Integrity Architecture & Open Contracting Paradigms (Meijer, 2013; Sampford, 2010). Ensuring that public expenditure information flows remain transparent, accessible, and actionable.	Institutional Coordination Mitigating systemic corruption risks within highly vulnerable fiscal domains, thereby transforming bureaucratic procurement into a nexus for collaborative accountability.

Public Sector Whistleblower Protections *(NACC & Oversight Agencies)*	Amending the *Public Interest Disclosure (PID) Act 2013*, streamlining secure internal reporting channels, and reinforcing stringent confidentiality safeguards for disclosers.	Moral & Social Dimensions of Governance (L. Huberts & Lasthuizen, 2014). Establishing institutional trust and psychological safety to facilitate the secure articulation of ethical concerns.	Ethical Coherence Designing multi-layered accountability pathways underpinned by independent monitoring from civil society organizations and statutory integrity commissions.
Transparent Political Donations and Advertising *(Australian Electoral Commission)*	Enforcing real-time disclosure of campaign donations and implementing rigorous regulations on digital political advertising to counter misinformation and illicit financial influence.	Collaborative Governance Theory & Democratic Accountability (Ansell & Gash, 2008; Emerson & Nabatchi, 2015). Catalyzing a regime of co-produced governance and democratic resilience.	Participatory Accountability Extending integrity standards beyond the administrative bureaucracy into the broader political domain, thereby framing electoral financial transparency as a shared civic responsibility.

Source: Compiled by the authors based on Australia's OGP National Action Plan 2023–2025 and related policy frameworks.

Synthesizing the findings across the five commitments reveals that Australia's OGP 2023-2025 reforms collectively construct an integrated Systemic Integrity Governance Model. This model operates through three interlocking dimensions: (1) Ethical Coherence, established through the Commonwealth Integrity Strategy and Whistleblower Protections; (2) Institutional Coordination, achieved via Beneficial Ownership and Procurement Integrity reforms; and (3) Participatory Accountability, reinforced through Political Donations Transparency and multi-stakeholder engagement mechanisms. Together, these dimensions demonstrate how open government principles can evolve into a governance capacity, one that aligns moral norms, administrative systems, and civic participation into a cohesive framework for anti-corruption and public integrity.

This integrative model confirms that transparency, when embedded in institutional design and ethical culture, functions as more than procedural disclosure, it becomes an adaptive system of accountability and learning. Australia's experience shows that open government, when coupled with integrity-based governance, can transcend sectoral silos and generate systemic resilience against corruption and administrative decay (Australian National Audit Office, 2022; Organisation for Economic Co-operation and Development, 2022). The Australian case provides a conceptual and practical blueprint for countries seeking to institutionalize integrity as both a moral and systemic function of democratic governance.

Conclusion

This study demonstrates that Australia's Open Government Partnership National Action Plan 2023-2025 represents a mature phase in the evolution of integrity-oriented public governance reform. Unlike earlier transparency initiatives that primarily emphasized administrative compliance and information disclosure, the current policy framework integrates ethical principles, institutional coordination, and participatory accountability into a unified model known as the Systemic Integrity Governance Model. Through its five key commitments, Integrity Strategy for the Commonwealth Public Sector, Beneficial Ownership Requirements, Integrity in Procurement and Grants, Whistleblower Protections, and Transparent Political Donations, Australia has developed a multidimensional approach that positions openness and integrity as foundational elements of governance, rather than as complementary policy instruments.

This model expands the frameworks of good governance, institutional integrity, and collaborative governance. The integration of these three perspectives underscores that the sustainability of integrity and anti-corruption systems fundamentally depends on systemic coherence between normative ethics, institutional design, and citizen participation. By institutionalizing openness within integrity bodies such as the Australian Public Service Commission, the National Anti-Corruption Commission, and the Australian National Audit Office, Australia has transformed transparency into an adaptive mechanism for learning, prevention, and accountability. Empirically, the five commitments form three interrelated pillars: ethical coherence, which embeds integrity values as a moral culture within public institutions; institutional coordination, which aligns administrative processes and interagency collaboration to reinforce systemic integrity; and participatory accountability, which extends openness into the political domain and strengthens citizens' oversight in governance. Together, these pillars demonstrate that the strength of open government lies not merely in transparency, but in its ability to institutionalize integrity as a sustained systemic quality.

Based on this synthesis, several policy recommendations can be proposed for Australia and other countries seeking to integrate open government principles into institutional integrity systems. First, integrity should be institutionalized as a core governance capacity rather than treated as a compliance mechanism. Second, the interoperability of transparency systems should be strengthened, as open government reforms become more effective when transparency platforms, such as beneficial ownership registries, open procurement databases, and political finance reports, are interconnected. Third, stronger protections are needed for whistleblowers and civil society actors. Fourth, the development of collaborative integrity networks should be regarded as a key strategy in modern governance. Fifth, reinforcing political integrity and digital transparency is essential in the context of expanding digital democracy. For countries undergoing governance transitions or anti-corruption reforms, Australia's model can serve as a roadmap for reform, beginning with the strengthening of ethical coherence in public institutions, followed by institutional integration, and culminating in participatory accountability. This evolutionary trajectory illustrates a shift from reactive anti-corruption strategies toward proactive governance design, from compliance integrity to systemic integrity.

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