A learning opportunity in transparency implementation

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At first and understandably, the large amount of disclosure obligations has caused Istat to focus mostly on compliance.

The upcoming challenge now is on the side of organisational culture – that is, building a shared know-how ("organizational learning") on the subject. (*)

Still getting to such awareness is not easy nor granted ...

- “the organization as a whole may have made a commitment to a policy of open communication, but if there are attitudes or preconceptions or procedures left over from what the organization was like before, they may work against the new order.” (*)

- “(...) learning contexts live within a “self-evident system” which then results in organizational inertia (...) The effect (...) is an interweaving of daily practices, functions and tasks getting a halo of inescapability for people using them on a daily basis.” (**)
Various formal as well as informal initiatives and practices have been started and shared in Istat! They have been aiming at both facilitating the knowledge of transparency and disclosure obligations and standardising the plenty of continued actions coming from them.
Among formalised initiatives it is worth mentioning:

- The adoption of an internal provision to implement the Italian Freedom Of Information Act (FOIA)
- The setting up of:
  - a Team supporting the Head of Anti-corruption & Transparency Management (Head of AC&TM);
  - the Network of Contact Persons for AC&T;
  - two task forces within the directorates mainly involved in disclosure obligations.
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Among informal initiatives it is worth mentioning:

• The making of a small group monitoring the implementation of FOIA;
• The drafting of operational directions to disclose documents and information on the website.
The Network of Contact Persons for AC&T - 1

- A cross-cutting function (so to speak) that has been recommended by the National Anti-corruption Plan since the end of 2013.
- The Network must, among other things, keep the Head of AC&T Management regularly informed about any disclosure initiatives undertaken by senior managers, as well as contribute to the monitoring of their related obligations.
So, the Contact Persons are expected to perform an important role in facilitating connection between the senior managers in charge and the Head of AC&TM, also by ensuring the publication of data, information and documents according to the current legislation.

Furthermore, they are free to suggest any qualitative improvement about the data, information and documents subject to disclosure.
Interconnections involved when being a Contact Person for AC&T – CASE 1
Interconnections involved when being a Contact Person for AC&T – CASE 2

Diagram showing the connections between Director, Head of Division, Contact Person (in staff), and Employees.
Interconnections involved when being a Contact Person for AC&T – CASE 3

Head of Department

Contact Person

Head of Division

Employees

(Divisions in staff)

(Department X)

DIRECTORATES

(Their own Contact Persons)
Interconnections involved when being a Contact Person for AC&T – ANYWAYS

Head of AC&T Management

Related (high/middle/low) Managers

Risk Management Function

Performance Function

Directorate/Department X

Assessment Independent Body

Directorate General
The Network of Contact Persons for AC&T - 3

- All the above actually means that a Contact Person is expected to give inputs (on AC&T) to both his/her Head of division /directorate and his/her colleagues in and out of the division/structure he/she belongs to.

- It actually means, as well, that such inputs should be welcomed and implemented at all levels of the directorate and its divisions.

- Since Istat Network of Contact Persons is mostly composed of people from the low management, what instead still happens is that they find it difficult:
1. To view their important cross-cutting role as something welcomed, because of an organisational culture that is still hierarchy-oriented.
   – Of course hierarchy is necessary but since AC&T system is rather process-oriented (meaning that it often needs cross-cutting actions), the hierarchical point of view seems no longer enough;

2. To access, due to the same shared hierarchical orientation, the practices and know-how within the divisions they don’t belong to: this lack of knowledge often makes their AC&T inputs far less effective.
“To avoid any slowing of the innovative drive of a company, it is vital the employees overcome insular thinking. This means they should look beyond their own department borders, not only focusing on their own tasks but also on the process steps upstream and downstream from themselves.” (*)

Here UP(stream) and DOWN(stream) do not have the vertical meaning of “high” and “low” of course – they indicate what comes before and after one’s own tasks within any process, thus cross-cutting the organizational sectors.

From hierarchy- to process- to implement transparency (and more?)

• In order to facilitate the transition to a process-oriented culture (envisioned by both Istat modernization programs and Italian AC&T law), it seems important to invest in:
  – communication and reiteration: any new rules or directions have to be fully circulated and repeated over and over – especially when people in charge turn over;
  – promoting (in a gradual and steady way) the building of a cross-cutting work identity (far different from a list of profile duties).
From hierarchy- to process- to implement transparency (and more?)

The Istat Network of Contact Persons for AC&T can be further trained and better exploited along these lines, thereby getting a relevant connection tool able to give impetus to AC&T enforcement and to modernization as well.
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Few closing words about some soft skills to develop for the purpose...

• Among prerequisites for effective communication there is something less “transparent” (oops) and yet worth considering...

  “The delivery method chosen must suit the circumstances and the needs of both the sender and the receiver. The content of the message has to resonate and connect, on some level, with the already-held beliefs of the receiver. It must contain the information that the employee wants to hear. It must answer the employee's most (...) cared about questions.” (*)

(*) https://www.thebalancecareers.com/communication-in-change-management-1917805
Therefore a crucial part could be played, in the long run, by the learning of the ability to customize any communication on the job according to the thought patterns of recipient colleagues/employees, so paying to it the same attention (AT ALL LEVELS) payed to the communication addressed to stakeholders and clients.

Perhaps it is important to understand that such ability is far less a matter of emotional involvement than one of being able to shift among different patterns of thought, expectations, beliefs, values.
When it comes to talk to listening skills in organizational contexts (empathy above all), embarrassment makes its way (in Italy, at least), thus we may forget that successful active listening requires the ability to «see», to visualise (patterns of thought, expectations, beliefs, values) much more than the ability to feel (odd emotions) – especially in organizational contexts.
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Different levels of change (*)

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<thead>
<tr>
<th>Deepness of change</th>
<th>SECTORAL</th>
<th>RADICAL</th>
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</thead>
<tbody>
<tr>
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<td>LOW</td>
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<tr>
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Change width

(organisational area-s affected)

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