Sciendo

Applied Mathematics and Nonlinear Sciences

https://www.sciendo.com

The Rules of Conflict-of-Interest Management for Public Officials under the "British Model": A Content Analysis Based on 19 Codes of Ethics

Wenyu Li[1,†]

1. School of Humanities and Law, China University of Mining and Technology (Beijing), Beijing, 100083, China.

Abstract

The United Kingdom is one of the countries globally known for its high level of integrity and has essentially developed a relatively comprehensive mechanism for preventing and addressing corruption. Effective management of conflicts of interest among public officials is a crucial aspect of corruption prevention in the United Kingdom. The United Kingdom emphasizes establishing a system of ethical norms that encompasses standards for public life more than other nations. By constructing a two-dimensional analysis framework for conflict-of-interest management tools and categories of public officials and utilizing the NVivo14 text analysis tool, we conducted a content analysis of the relevant portions in the British Code of Ethics text concerning managing conflicts of interest among public officials. The study revealed that conflict-of-interest management rules demonstrate a high degree of transparency orientation. The focus is on teaching public officials how to effectively handle conflicts of interest, not just prohibiting or dispossessing them of their private interests. The coordinated use of various management tools tailored to different conflict-of-interest scenarios results in effectively managing conflicts of interest among public officials.

†Corresponding author.
Email address: kuikui941022@outlook.com

1 Introduction

Conflict of interest (COI) represents a complex social phenomenon and a specialized term in the integrity field. It has garnered widespread attention since entering the international integrity research landscape in the 1970s. The Organization for Economic Cooperation and Development (OECD) defines COI in the public sector as the conflict between the public duties of public officials and their private interests, arising when the private interests of public officials may inappropriately influence the discharge of their public duties [1]. COI differs from corruption but serves as a significant precursor to it. Corruption materializes through COI, and effective institutional arrangements and management approaches to prevent public officials from being influenced by private interests in their performance of public duties can help prevent and disrupt corruption, thereby safeguarding the integrity of the public sector.

In today's world, most countries and regions attach great importance to preventing COI among public officials and have established comprehensive systems to address this issue in practice. These measures include formulating prevention laws and establishing crimes related to COI, strengthening the ethical management of public officials, and setting up specialized ethical oversight agencies to manage COI among public officials. The United Kingdom (UK) is among the early adopters in addressing and governing COI among public officials. Since 1994, the issue of COI in public life has received widespread attention, and new mechanisms have been introduced to tackle it. Currently, the UK has established a framework of standards in public life based on the "Nolan Principles [2]." The 'Nolan Principles,' also known as the Seven Principles of Public Life, encompass "Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty, and Leadership," providing a common ethical standard for all public officials in the UK. They explicitly address the prevention of COI among public officials, stating that 'Holders of public office should act solely in terms of the public interest. They should not do so to gain financial or other material benefits for themselves, their family, or their friends. They should declare and resolve any conflicts of interest about their public duties.' The management of COI among public officials has become a crucial aspect of public life in the UK. To uphold and safeguard the 'Nolan Principles,' the UK has established a regulatory framework comprising ethical norms, independent scrutiny, and education. Under this framework, the UK has effectively placed public officials and public processes prone to COI under effective supervision.

The UK model is a valuable case study in managing conflicts of interest (COI) among public officials, which addresses many theoretical and normative issues related to COI in modern states [3]. An overview of the evolution of COI prevention systems reveals that the UK largely views COI as an ethical rather than a legal issue, with self-regulation and establishing codes of conduct being the primary mechanisms to curb COI among public officials [4]. In their empirical research on the management of COI within the European Parliament, European scholars cite the UK as a case where high transparency drives COI management, arguing that clear accountability enhances the applicability of transparency as a constraining mechanism. The UK's highly centralized political system makes moral reforms more favorable than countries with separate and shared powers [5].

High ethical standards underpin public trust in the public sector, as evidenced by a poll conducted by the UK's Committee on Standards in Public Life, which shows that 76% of the public believe that high ethical standards are crucial for effective governance [6]. Thus, this paper begins by examining the ethical norms within the regulatory framework and employing content analysis to analyze the provisions related to managing COI among public officials in 19 UK ethical codes. The analysis explores the characteristics of the UK's ethical rules for public officials regarding text types, management tools, and target audiences. It investigates how these rules effectively manage COI across different categories of public officials.

2   A two-dimensional analytical framework for ethical codes based on management tools and categories of public officials

Research by scholars both domestically and internationally on conflicts of interest (COI) among public officials primarily encompasses definitions and classifications of COI, management logic and approaches, as well as the costs and benefits of management. Regarding management approaches for COI, scholars have focused on the combination of management principles and methods encompassing institutional frameworks, modes of management, and regulatory tools for managing COI. Foreign scholars have conducted in-depth studies on the constituent elements of institutional frameworks for preventing COI [7]. In an empirical examination of the evolution of the European Parliament's system for preventing COI, they constructed an analytical framework centered on core elements such as rule stringency, effective enforcement, punishment severity, and transparency [8]. Domestic scholars, such as Gong Ting and others [9], argue that a comprehensive system for preventing COI should encompass five essential elements: regulation, declaration, disclosure, supervision, and accountability. Scholars believe that rules are the primary factor in preventing COI, with stringent rules being the foundation of such systems, which logically create the necessary conditions for transparency and sanctions. Ethical governance of public officials is the core of managing COI, with regulations aimed at preventing and disclosing situations that may undermine their impartiality and objectivity in performing public duties [10]. Therefore, this paper focuses on ethical rules and explores COI management tools' distribution and utilization characteristics within the context of ethical codes.

2.1   Dimension X: management tools for preventing conflicts of interest among public officials

The rules governing conflicts of interest among public officials achieve their objective of preventing such conflicts through specific management tools and means. Zhuang Deshui comprehensively introduced five policy tools based on the practices of OECD countries in managing and preventing conflicts of interest: prohibitive, divestiture, recusal, restrictive, and disclosure tools [11]. Messick proposed four methods to mitigate conflicts of interest: recusal, divestiture, disclosure, and incompatibility, categorized as preventive and disclosure means [12]. Mattarella suggested that managing conflicts of interest can be done by using tools such as removal, neutrality, and disclosure, which are all applicable in different situations [13]. Integrating the perspectives of domestic and international scholars, this paper classifies the management tools for preventing conflicts of interest among public officials into five categories: prohibition, divestiture, recusal, incompatibility, and disclosure. Table 1 presents the specific modalities of each management tool.

Table 1. Classification Of Management Tools For Conflicts Of Interest Among Public Officials

Category	Specific Tools
Prohibition	Zero Tolerance
	Bright-Line Rules
	Public Identification
Divestiture	Sale of Interests
	Blind Trusts
Recusal	Recusal from Positions
	Recusal from Official Duties
Incompatibility	Part-Time Job Restrictions
	Post-Employment Restrictions
Disclosure	Register of Interests
	Declaration of Interests
	Public Disclosure of Interests

2.2 Dimension Y: categories of public officials

The Seven Principles of Public Life have led to the establishment of distinct codes of conduct and corresponding ethical guidelines for various categories of public officials in the United Kingdom. Based on whether they are subject to statutory term limits and whether specialized ethical codes of conduct regulate them, British public officials can be divided into six types: Members of the House of Lords and the House of Commons with term limits, members of public bodies and commissions, as well as ministers, special advisers, and civil servants without term limits. The analysis of members of public bodies and commissions focuses on key ethical oversight bodies, including the Independent Parliamentary Standards Authority, the Advisory Committee on Business Appointments, and the Civil Service Commission. Given that specialized codes of conduct have been formulated to address conflicts of interest for each category of public officials, an analysis that integrates the characteristics of different types of public officials with the use of conflict-of-interest management tools can provide distinct perspectives for exploring classified management of conflicts of interest among public officials.

2.3 Two-dimensional analytical framework

Based on this, the present paper constructs a two-dimensional analytical framework utilizing content analysis, as illustrated in Figure 1. Holistic statistical categorization and analysis are conducted on the fundamental elements of the ethical codes for UK public officials, such as text types, target groups, and thematic vocabulary. To discover the utilization characteristics of conflict of interest management tools from the X-dimension, each clause of the ethical codes is scrutinized based on their specific content. Lastly, by incorporating different categories of public officials, the Y-dimension analysis delves into how the UK effectively classified conflicts of interest among public officials by formulating ethical codes.
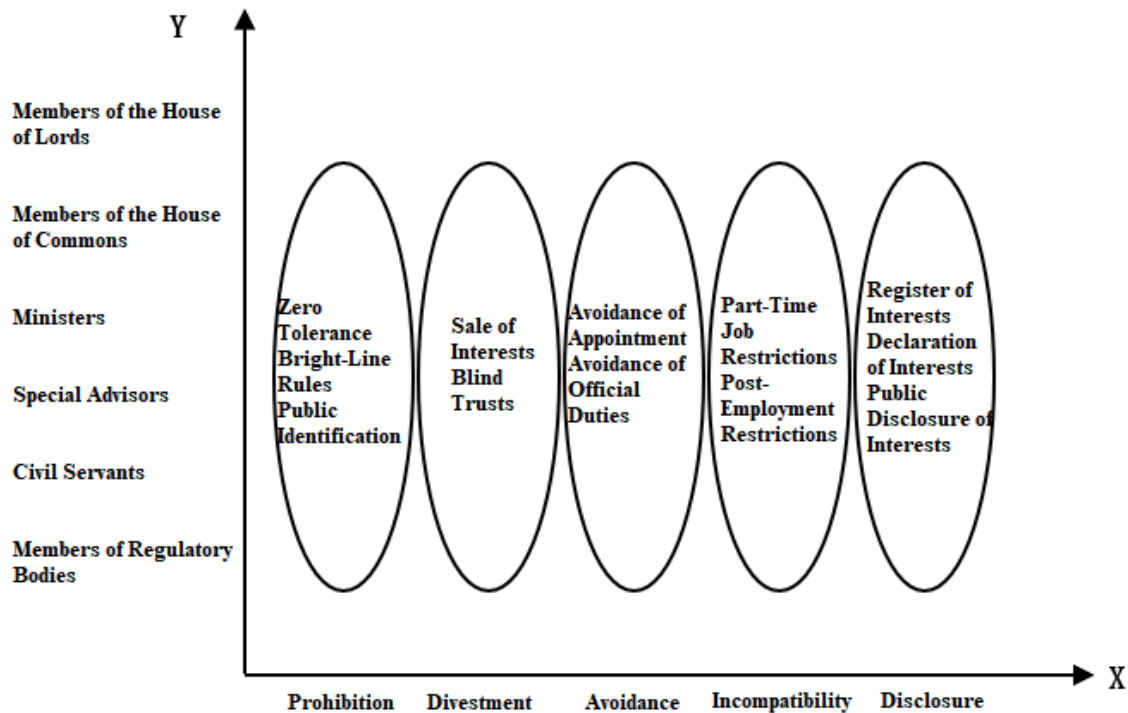
Figure 1. Two-Dimensional Analytical Framework for Regulations on Preventing Conflicts of Interest Among UK Public Officials

3   Research methodology and sample selection

3.1   Research method: content analysis

Content analysis is a scientific research approach that involves analyzing content to conclude. The primary steps encompass defining the research question, selecting samples, identifying units of analysis, specifying an analytical framework, coding sample content, analyzing the coded data, and finally summarizing and drawing conclusions. [14] Based on the institutional framework for preventing conflicts of interest, this paper utilizes content analysis to examine the sections related to managing conflicts of interest among public officials in the UK's ethical codes. With the dimension of management tools as the primary thread and the categories of public officials as a supplementary factor, this study aims to sort out and explore the characteristics of the UK's categorized management of conflicts of interest among public officials, with the aspiration of gaining valuable insights and lessons for reference.

3.2   Sample selection and text coding

3.2.1   Data sources

Using keywords such as "conflict of interests," "code of conduct," "principle," and others, a search was conducted on relevant UK websites, including "gov. uk" and "parliament.uk." After eliminating duplicates and texts with low relevance, 19 ethical code texts related to managing conflicts of interest among various categories of public officials, including parliamentarians, ministers, civil servants, and others, were obtained, as shown in Table 2. By combining these ethical code texts, we can create a framework in the UK public sector that prevents conflicts of interest, enhances

transparency, and upholds ethical standards. Notably, the Seven Principles of Public Life can be found in codes of conduct and guidance for various public officials, including members of the House of Commons and the House of Lords, ministers, and civil servants. Over time, the specific content of these codes and guidance is constantly updated and refined. For instance, the "Ministerial Code" has undergone six revisions and updates since its initial publication in 2010, spanning 12 years up to 2022, while the "Code of Conduct for Members of the House of Commons" and its accompanying guidance have been revised ten times leading up to the latest version in 2023.

Table 2. Key Ethical Code Texts For UK Public Officials

Number	Title of Ethical Code Text
1	Seven Principles of Public Life
2	Ministerial Code
3	Rules for Commercial Appointments of Former Ministers
4	Parliamentary Code of Conduct
5	Code of Conduct for Members of the House of Lords
6	Guide to the Code of Conduct for Members of the House of Lords
7	Code of Conduct for Members of the House of Commons
8	Guide to the Code of Conduct for Members of the House of Commons
9	Code of Conduct for Special Advisers
10	Civil Service Code
11	Principles for the Recruitment of Civil Servants
12	Civil Service Management Code
13	Guide to the Civil Service Code
14	Rules for Commercial Appointments in the Civil Service
15	Governance Rules for Public Appointments
16	Code of Conduct for Members of Public Bodies
17	Code of Conduct for Members of the Advisory Committee on Business Appointments
18	Code of Conduct for the Chairman and Members of the Independent Parliamentary Standards Authority
19	Code of Practice for Members of the Civil Service Commission

3.2.2 Text coding

Define the units of analysis in content analysis, which are the different factors to be examined that have an inherent connection with the research objectives and facilitate the extraction process. Utilizing Nvivo14 software, we have designated the indicators within the dimension of management tool types as the units of analysis. These units are then coded, following a one-to-one correspondence format of "Text Number - Section Number - Clause - Item," for the content related to managing conflicts of interest among public officials in the UK ethical code texts. The result of this process was 252 units of analysis. Taking the "Ministerial Code" (Text Number 1) as an example, an initial coding demonstration is presented in Table 3.

The Rules of Conflict-of-Interest Management for Public Officials under the "British Model": A Content Analysis Based on 19 Codes of Ethics

7

Table 3. Coding Table For Units Of Analysis In Ethical Code Texts

Text Chapter	Text Item	Content Analysis Unit	Code
VII. Ministers' Private Interests	7.1 General Principles	Ministers must ensure that there is no conflict, or perceived conflict, between their public duties and their private interests, whether financial or otherwise.	1-1-1
	7.2 Duty to Avoid Conflicts	Each Minister has a personal responsibility to decide whether, and what, action is needed to avoid conflicts or perceptions of conflict, taking into account advice from their Permanent Secretary and the Independent Adviser on Ministers' Interests.	1-1-2
	……	……	
X. Ministers' Travel	10.2 Overseas Visits	Departments will publish quarterly details of all overseas travel undertaken by Ministers.	1-3-2-2
		When meeting with ministers and/or overseas government officials overseas, or in places where official business may be discussed, Ministers should always ensure that a Private Secretary or Embassy official is present... Any significant content should be fed back to the department as soon as possible after the event.	1-3-2-4
	... ...	... ...	... ...

4 Empirical analysis

4.1 Basic overview of ethical code texts in the UK
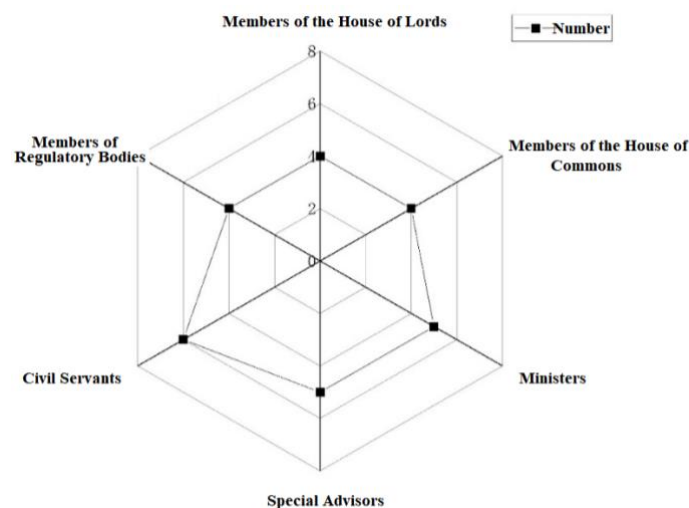
4.1.1 Types of ethical code texts

This paper analyzes four types of ethical code texts that relate to UK public officials: principle-based documents, codes of conduct, ethical guidelines, and governance rules. Using concise and precise language, principle-based documents provide foundational guidance for the behavior of all or certain categories of public officials, as shown in Figure 2. For instance, the Seven Principles of Public Life serve as the fundamental ethical standard for UK public officials. They apply to all public servants and are included in all ethical code texts. The most significant type of ethical code text is codes of conduct, which account for half of the total, and each category of public officials has its own tailored code of conduct. Guideline documents complement codes of conduct, where the latter outlines the rules that public officials must abide by. At the same time, the former offers more detailed explanations of how public officials should comply with the requirements of the codes of conduct. Governance rules primarily target government and parliamentary procedures that are vulnerable to conflicts of interest among public officials, such as public appointments, commercial appointments, and civil service recruitment.
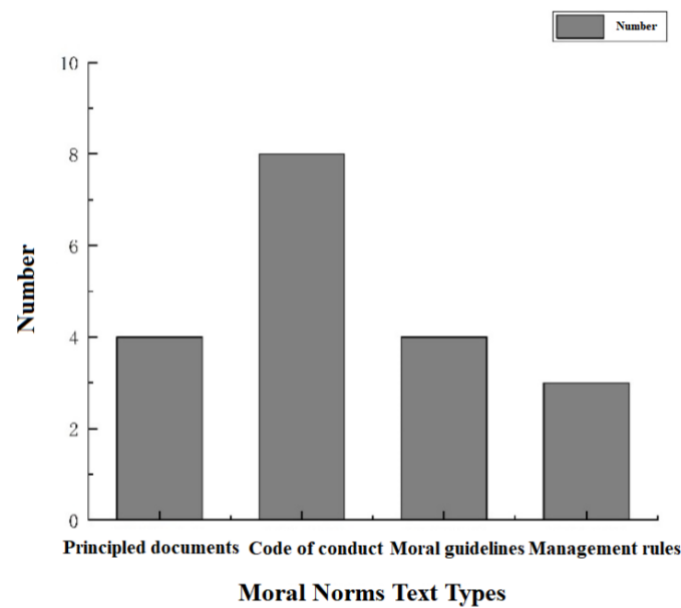
Figure 2. Distribution of Types of Ethical Code Texts

4.1.2　Normative targets of ethical code texts

Based on the classification above of UK public officials, the normative targets of ethical code texts are illustrated in Figure 3. It has been observed that at least four ethical code texts related to conflict of interest management are required of various categories of public officials. Members of Parliament (MPs) are bound by the Seven Principles of Public Life, Codes of Conduct, and the accompanying Ethical Guidelines complementing the Codes of Conduct. Civil servants, including Ministers and Special Advisers, are also subject to rules governing commercial and public appointments.

Figure 3. Distribution of Normative Targets of Ethical Code Texts

4.1.3　Word frequency analysis of ethical code texts

Utilizing the word frequency analysis function of NVivo 14, we can visually present the frequency and density of words appearing in the coded texts. Font size is used to determine the frequency of a

The Rules of Conflict-of-Interest Management for Public Officials under the "British Model": A Content Analysis Based on 19 Codes of Ethics
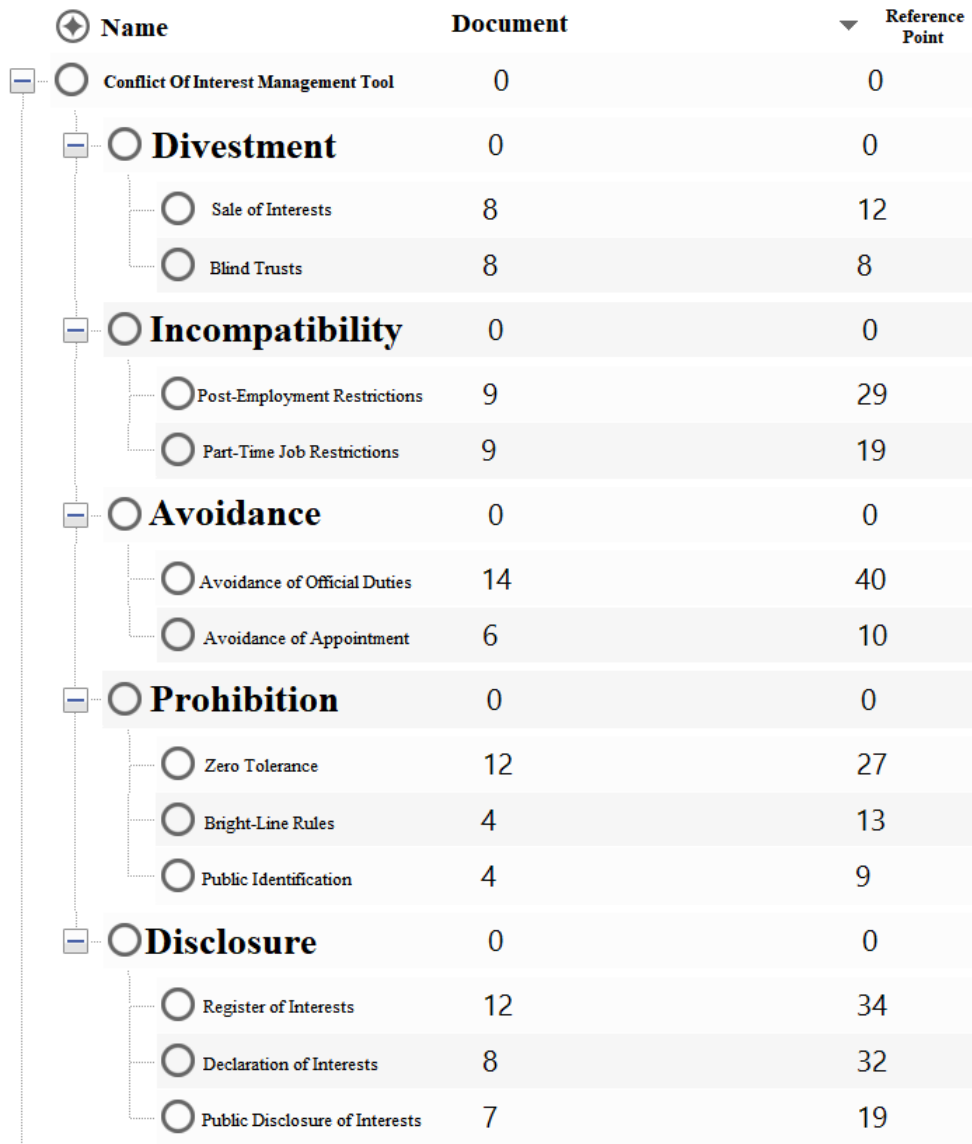
9

word in the coded texts, with larger fonts indicating higher frequencies. Thematic vocabulary related to managing conflicts of interest among UK public officials through ethical codes is highlighted by a cloud of high-frequency keywords in Figure 4. On the one hand, among the keywords describing the targets of conflict of interest management, such as "Members of Parliament," "Civil Servants," and "Ministers," "Members of Parliament" appears most frequently, suggesting that there is a significant amount of content related to the management of conflicts of interest involving MPs. On the other hand, among the keywords reflecting methods of conflict of interest management, "register," "declaration," and other words related to the disclosure of public officials' interests occur more frequently than others. Based on this word frequency analysis, we tentatively conclude that the UK's management of conflicts of interest among public officials focuses on the disclosure of interests by MPs in both the House of Commons and the House of Lords, aligning with the existing research perspective that UK's conflict of interest management is transparency-oriented rather than punishment-oriented. However, word frequency analysis provides only a vague indication of the concentration of keywords. It cannot elucidate the specific characteristics and differences in each management approach and its application across different categories of public officials. This paper will continue to analyze the texts by coding them and using the established two-dimensional framework.

Figure 4. Word Cloud Results of Ethical Code Texts for UK Public Officials

4.2 Two-dimensional analysis of conflict of interest management tools - categorization of public officials

This paper uses the content related to managing conflicts of interest among public officials collected from 19 ethical code texts as the basic analytical units. Regarding conflict of interest management tools, five tools - prohibition, divestment, recusal, incompatibility, and disclosure - are tree-like nodes. Based on these five categories, 12 coding rules for analytical sub-nodes have been established, as illustrated in Figure 5. These coding rules have led to extracting 252 reference points from the 19 ethical code texts.

Name	Document	Reference Point
⊕ **Name**	**Document**	**Reference Point**
○ Conflict Of Interest Management Tool	0	0
○ **Divestment**	0	0
○ Sale of Interests	8	12
○ Blind Trusts	8	8
○ **Incompatibility**	0	0
○ Post-Employment Restrictions	9	29
○ Part-Time Job Restrictions	9	19
○ **Avoidance**	0	0
○ Avoidance of Official Duties	14	40
○ Avoidance of Appointment	6	10
○ **Prohibition**	0	0
○ Zero Tolerance	12	27
○ Bright-Line Rules	4	13
○ Public Identification	4	9
○ **Disclosure**	0	0
○ Register of Interests	12	34
○ Declaration of Interests	8	32
○ Public Disclosure of Interests	7	19

Figure 5. Analysis Diagram of Primary Node Coding

4.2.1　X-Dimension: coding analysis of management tools dimension

The distribution of conflict of interest management tools used in the ethical code texts in the UK is shown in Table 4. The disclosure tool has the highest proportion of coded entries, with 85 coded entries representing 33.73% of the total, based on the frequency of entries related to these management tools. The UK's high transparency in preventing conflicts of interest among public officials reflects this characteristic. The usage distributions of recusal, prohibition, and incompatibility tools are relatively similar, with approximately 50 coded entries each, accounting for approximately 20% of the total, indicating their significance as conflict-of-interest management tools. The divestment tool's low proportion indicates limited use in the UK's ethical management system that emphasizes self-regulation. This text will specifically discuss the distribution and characteristics of the sub-nodes for each management tool.

Table 4. Distribution Of Management Tools

Management Tools	Tool Name	Frequency	Proportion	Total
Prohibition (Gifts, Hospitality Expenses)	Zero Tolerance	27	55.1%	
	Bright-Line Rules	9	18.37%	49
	Public Identification	13	26.53%	
Divestment	Sale of Interests	12	60%	
	Blind Trusts	8	40%	20
Avoidance	Avoidance of Appointment	40	80%	
	Avoidance of Official Duties	10	20%	50
Incompatibility	Part-Time Job Restrictions	29	60.42%	
	Post-Employment Restrictions	19	39.58%	48
Disclosure	Register of Interests	32	37.65%	
	Declaration of Interests	34	40%	85
	Public Disclosure of Interests	19	22.35%	
Total		252	100%	252 (100%)

1) Prohibition Tools

Transactional conflicts of interest are the primary focus of prohibition tools, as public officials, their spouses, and children may make decisions detrimental to public interests due to receiving benefits from others. These tools do not simply ban everything but can be divided into three approaches: zero tolerance, bright-line rules, and public disclosure (see Table 5). These approaches include prohibiting gifts under any circumstances, setting limits on the value of acceptable gifts, and requiring the declaration and public disclosure of received gifts to relevant authorities. The use of prohibition tools extends beyond gifts to hospitality, honors, and other similar situations.

As evident from Table 4, the zero tolerance approach, totaling 27 entries and accounting for 55.1% of prohibition tools, outnumbers the other two approaches combined, highlighting the UK's high standards and stringent requirements for the ethical management of public officials. However, the zero-tolerance approach may sometimes be impractical, given the inherent need for social exchanges. The compromise between bright-line rules and public disclosure is that officials have to report and dispose of gifts, hospitality, awards, and other benefits to their superiors or ethical oversight bodies. Public disclosure is crucial in prohibition tools, accounting for 26.53% of coded entries. Bright-line rules stipulate specific monetary limits for gifts, such as allowing ministers to keep gifts up to £140 and disallowing Independent Parliamentary Standards Authority members from accepting gifts more than £30 in value.

Table 5. Coding Of Prohibition Tools Nodes

Prohibition Dimension	Explanation of Dimension	Key Indicative Statements
Zero Tolerance	Public officials are not allowed to accept any gifts that may influence their official duties	No Minister may accept any gift, hospitality, or service from any person which would, or might appear to, place him or her under any obligation. The same principle applies to the giving of gifts, etc., to members of their families; Ministers should not normally accept decorations from foreign countries during their period of office.
Bright-Line Rules	Allowance of Public Officials Accepting Gifts Within a Single or Cumulative Value Limit	The Chairman and Members will not normally give or receive any gift exceeding £30 in value. In accepting gifts, value for money must always be considered; gifts of lesser value, currently set at £140, may be retained by the recipient.
Public Identification	Requirement for Public Officials to Declare and Disclose All Received Gifts to Relevant Departments	The Chairman and Members will record any gifts given to or by Board Members by declaring them to the Secretary of the Board; Departments and agencies must inform staff of the circumstances in which they are required to report gifts, hospitality, awards, medals, and other benefits offered.

2)   Divestiture Tools

Divestiture is a more aggressive approach to managing conflicts of interest, where public officials dispose of or place their interests under the management of a blind trust as the most effective means of eliminating any actual or perceived conflicts of interest. Divestment primarily encompasses two methods: relinquishment of interests and blind trusts (see Table 6). Giving up or selling financial interests through market transactions is what relinquishment of interests is about, like requiring officials to sell their stocks before joining the government sector. This method is direct and effective, but it can increase the cost for officials entering public service. A blind trust, on the other hand, entails officials entrusting their assets to an independent trustee who manages the assets while keeping the official's knowledge of the assets confidential during their term in office, thereby helping to address potential conflicts of interest.

The most frequently used tool for managing conflicts of interest is divestiture tools, used 20 times in ethical code texts related to conflict of interest management, accounting for 7.94% (see Table 4). Notably, there are no mandatory divestiture requirements; instead, there is a stronger emphasis on public officials' obligation to address conflicts of interest, including managing all conflicts to protect public interests and responsibly fulfill fiduciary duties. This approach is similar to that of other countries, where solutions like selling company shares and establishing trusts are only resorted to in exceptional cases, with most cases involving voluntary choices by public officials [15].

Table 6. Coding Of Divestiture Tools Nodes

Divestiture Dimension	Explanation of Dimension	Key Indicative Statements
Sale of Interests	Public officials sell or relinquish certain private interests that may affect their performance of official duties	When participating in these procedures, they should immediately resolve any conflicts between their personal interests and public interests, giving priority to the latter; holders of public office have the obligation to take steps to resolve any conflicts of interest that arise in a manner that protects the public interest.
Blind Trusts	Public officials entrust their assets to an independent trust institution for management, and remain unaware of the trust details during their tenure	This involves fulfilling fiduciary duties responsibly (i.e., ensuring that public funds and other resources are used appropriately and effectively); in cases of periodic appointments, it may only require temporarily entrusting held shares to a trustee for management; holdings in blind trusts may be exempt from registration.

3) Avoidance Tools

Avoidance refers to ensuring that public officials do not hold positions or engage in public affairs involving conflicts of interest with their relatives or individuals with specific relationships. It can be specifically divided into two categories: avoidance of appointments and avoidance of official duties (see Table 7). Eliminating public officials' involvement and decision-making powers in specific public affairs results in a neutral stance by separating the connection between their private and public interests. Avoidance tools are suitable for managing occasional conflicts of interest. The normal functioning of public institutions may be disrupted by excessive reliance on avoidance tools for frequently occurring conflicts of interest.

Table 4 indicates that avoidance tools are most commonly used for avoiding official duties, with entries for avoiding official duties and appointments accounting for 80% and 20%, respectively. Avoidance can be achieved by deliberating on public affairs, participating in political activities, or engaging with foreign governments, non-governmental organizations, or other institutions. The application of avoiding official duties is extensive, with 14 out of 19 ethical code texts addressing this tool (see Figure 5), making it the most prevalent among all conflict of interest management tools. While avoidance rules are established for various public officials and procedures related to public affairs, and ethics oversight agencies have dedicated departments and officials to provide consultation and guidance, the ultimate decision and responsibility for whether to participate in a particular matter rests with the public official.

Table 7. Coding Of Avoidance Tools Nodes

Avoidance Dimensions	Explanation of Dimension	Key Indicative Statements
Avoidance of Appointment	Prohibit public officials from holding positions in departments where their relatives or friends have vested interests	Ministers should relinquish any other public offices they may hold; the Chair and members of the Independent Parliamentary Standards Authority must not have been Members of the House of Commons at any time in the previous five years.
Avoidance of Official Duties	Prohibit public officials from participating in official activities that may be influenced by personal interests, jeopardizing the impartiality of decision-making	If public affairs that affect the private interests of ministers in any way must be discussed, the ministers should completely exclude themselves from the deliberation of such matters; these rules also require you to withdraw from discussions or decisions on matters in which you have a financial interest; no actions, speeches, or parliamentary proceedings (except voting) related to the interest can be conducted before the interest is registered.

4) Incompatibility Tools

Incompatibility refers to the prohibition against public officials concurrently holding two or more public positions that may give rise to conflicts of interest and the restrictive regulations governing their re-employment after leaving public service. These restrictions can be categorized into part-time job restrictions and post-employment restrictions (see Table 8). Part-time job restrictions encompass the simultaneous holding of positions in different public sectors by public officials and the pursuit of employment outside the public sector. The rules on part-time job restrictions are crucial to the separation of powers system. Taking legislators as an example, they are not permitted to hold positions in the government or judiciary simultaneously. The purpose of these restrictions is to prevent elected representatives from being influenced by conflicts of interest. Post-employment restrictions are an integral part of the civil service system. Public officials can assume dual identities as public and private individuals during the transition from public to private sector employment.

This presents the potential for exploiting public power and influence for private gain. To address this, the UK has established the independent Advisory Committee on Business Appointments, which handles post-employment issues for ministers and other civil servants by the Business Appointment Rules. It provides advice and imposes restrictions on potential employment activities. Separate Business Appointment Rules are for ministers, civil servants, and special advisers tailored to their respective public roles.

As indicated in Table 4, post-employment restrictions are the more frequently used incompatibility tool, with part-time job restrictions accounting for 39.58% and 60.42% of the coded entries, respectively. Post-employment restrictions for civil servants describe the waiting periods, conditions, and other limitations, including information confidentiality obligations, for former public officials seeking employment in the private sector. The stringency of these rules varies depending on the seniority or nature of the civil servant's work, with stricter restrictions imposed on higher-level civil servants and special advisers of equivalent rank. For instance, senior civil servants and special advisers of comparable rank are subject to the Business Appointment Rules for two years after leaving their posts, while ordinary civil servants and special advisers are subject to these rules for one year.

Table 8. Coding Of Incompatibility Tools Nodes

Incompatibility Dimensions	Explanation of Dimension	Key Indicative Statements
Part-Time Job Restrictions	Restrictions on the part-time employment of public officials during their tenure	Ministers should relinquish any other public offices they may hold; the Chair and members of the Independent Parliamentary Standards Authority must not have been Members of the House of Commons at any time in the preceding five years. Holders of public office should not undertake any financial or other obligations to external individuals or organizations that might affect the performance of their public duties.
Post-Employment Restrictions	Restrictions on the employment of public officials after leaving their posts	Upon leaving office, Ministers will be prohibited from lobbying the government for a period of two years; civil servants wishing to take up any new appointments or work within two years of leaving their posts must submit an application; Special Advisers must submit an application to the Head of their former department if they wish to take up new appointments or work after leaving the civil service.

5)   Disclosure Tools

Disclosure is the most common approach to managing conflicts of interest. Many countries require public officials to disclose their assets to the public, aiming to provide information on any economic or non-economic benefits obtained by public officials that may reasonably be perceived to influence their performance of public duties. This makes it easier for the public to judge whether they prioritize public interests over private interests. Disclosure involves two aspects: declaration and publication of interests. The UK has also established a register system for high-level public officials, which details the interests that need to be registered and the scope of disclosure (see Table 9). The key factor in determining relevant interests is whether the public perceives them as potentially influencing the behavior of public officials in fulfilling their public duties.

According to the disclosure tool coding results, interest registers, declarations, and publications account for 37.65%, 40%, and 22.35%, respectively. The rules related to these three specific disclosure methods are comprehensive and detailed. The interest register system explicitly mandates the registration and updating of relevant interests by high-level public officials upon appointment and within specified timeframes. Declarations and publications of interests enhance the register system. Declarations of interests are mentioned

in all 12 ethical texts. For instance, members of the House of Lords must declare interests that do not need to be registered before discussing a particular issue, ensuring that members, the public, and others are duly informed of any interests related to the proceedings or the members' words and deeds. Due to the broad scope of issues, members must declare almost every aspect of their parliamentary duties, which encompasses a wider range of interests than registration. Publications of interests mainly cover details such as receptions, overseas travel, and meetings with external entities by public officials not included in the interest register, typically disclosed on a departmental basis.

Table 9. Coding Of Disclosure Tool Nodes

Disclosure Dimensions	Explanation of Dimension	Key Indicative Statements
Register of Interests	Requires public officials to register all relevant interests in the interest register	Upon appointment, Ministers must provide a complete written list to their Permanent Secretaries of all interests that may be considered as giving rise to conflicts; the register of interests of the Chair or members of the Independent Parliamentary Standards Authority is published and updated quarterly; Members of the House of Lords must complete and submit a registration form to the House of Lords Register of Interests within one month of taking office.
Declaration of Interests	Requires public officials to declare private interests that fall outside the scope specified in the interest register	If it is appropriate for a Minister to retain a private interest, he or she should declare it to their Ministerial colleagues; holders of public office have a duty to declare any private interests relating to their public duties; Members of the House of Lords should declare any interests relating to the matter under debate or discussion when speaking.
Public Disclosure of Interests	Requires public officials to publicly disclose private interests that are not covered by the interest register	Departments will publish detailed information on ministerial receptions quarterly; departments will publish detailed information on all overseas travel undertaken by Ministers quarterly; information on the number and costs of Special Advisers will be published annually.

4.2.2 X-Y dimension: analysis of conflict of interest management tools utilized by different categories of public officials

1) Management Tool - Public Official Category Matrix Coding

Given that the coding entries related to conflict of interest management tools in ethical guidelines texts encompass multiple categories of public officials, such as the Seven Principles of Public Life, which serve as the ethical norms to be observed by all types of public officials, repeated counting is employed in the statistical coding process to derive the Management Tool - Public Official Category Matrix Coding Table (see Table 10). By comparing the frequency of coding entries for conflict of interest management tools among different categories of public officials, it becomes evident that Members of the House of Lords and civil servants have the highest number of conflict of interest management rules, with 69 and 60, respectively. Ministers and Members of the House of Commons closely follow each other, with 49 and 32 rules, respectively. Relatively fewer rules are observed for members of ethics regulatory bodies and special advisors, with 19 and 16, respectively.

Table 10. Statistics of the Management Tool - Public Official Category Matrix Coding Table

Category of Public Officials	Prohibition	Divestment	Avoidance	Incompatibility	Disclosure	Total
Members of the House of Lords	9	4	13	8	35	69 (28.16%)
Members of the House of Commons	3	4	8	5	12	32 (13.06%)
Ministers	7	6	17	8	11	49 (20%)
Special Advisors	2	2	3	6	3	16 (6.53%)
Civil Servants	10	9	13	19	9	60 (24.49%)
Members of Regulatory Bodies	7	1	4	2	5	19 (7.76%)
Total	38	26	58	48	75	245

This is the average frequency of coding entries for conflict of interest management tools across the four ethical guidelines texts involving members of ethics regulatory bodies.

2) The Utilization Structure of Conflict of Interest Management Tools Among Different Categories of Public Officials

From the perspective of the utilization structure of conflict of interest management tools, as illustrated in Figure 6, House of Lords and House of Commons members exhibit similar patterns, with disclosure tools accounting for the highest proportion and incompatibility tools occupying the lowest. The registration systems for Members' interests and the declaration of interests in both Houses primarily use disclosure tools, which have been well-established with monthly transparency reports. The limited restrictions on part-time and post-employment are attributed to the nature of Members' work; unlike civil servants, Members are not appointed for life and their position is not full-time. While Members are permitted to engage in other remunerated employment, such activities must remain outside the realm of parliamentary activities, and they are prohibited from accepting remuneration in exchange for parliamentary advice and other services.
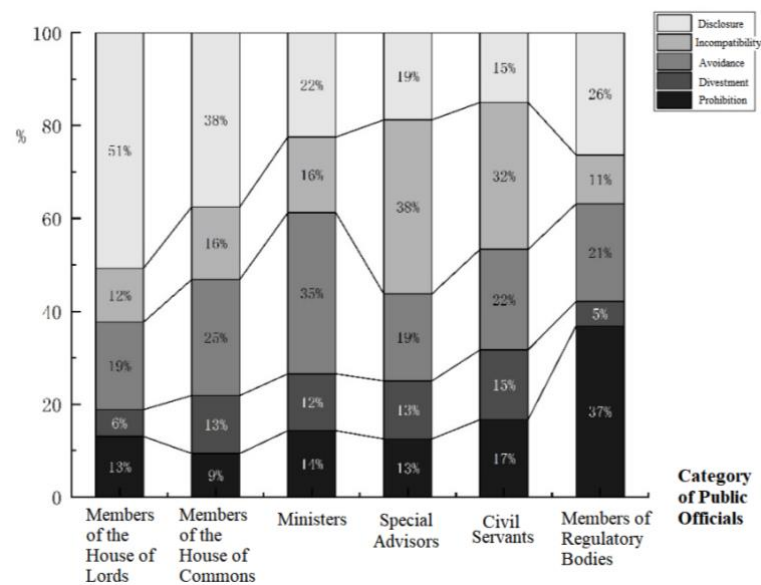
The use of conflict of interest management tools for Ministers is dominated by avoidance tools, which account for 35%, while the other four tools are relatively balanced. This is closely related to the content of ministers' work, which involves numerous official meetings during their duties, where potential conflicts of interest often arise. Private secretaries or other officials are necessary for all discussions related to government affairs, so Ministers are prohibited from participating in such activities alone. The latest revision to the "Ministerial Code of Conduct" emphasizes that "when holding meetings with Ministers and overseas government officials overseas, or in places where official business may be discussed, Ministers should always ensure that a private secretary or embassy official is present."

The utilization structure of conflict of interest management tools among civil servants and special advisors is relatively similar, with the highest number of ethical rules targeting part-time employment and post-employment behaviors, accounting for more than 30% of the total. The large number of civil servants and the frequent role transitions between the public and private sectors pose significant risks of conflicts of interest, known as the "revolving door" phenomenon. Civil servants may seek benefits and advantages from the private sector at the expense of public interests, such as providing improper favors to enterprises during their tenure and subsequently being hired by these enterprises at high salaries after leaving

office. Similarly, when entering the private sector, former civil servants can use their influence or information collected during their tenure to impact government policies. To address these risks, detailed rules governing part-time employment and post-employment restrictions need to be established, aiming to bring "revolving door" conflicts of interest under the regulatory framework and standardize the mobility of civil servants between the public and private sectors.

In the codes of conduct for members of ethics regulatory bodies, the prohibition tool is the most frequent occurrence, accounting for 37%. Often, the departments formulate the codes of conduct for these members, which reflect the stricter rules on accepting gifts and hospitality imposed by these oversight agencies as ethical standards setters. Compared to other public officials, members of ethics regulatory bodies are required to declare gifts exceeding £10 to the board secretary, which is the lowest threshold among the explicit monetary limits set in these rules.

Figure 6. Utilization Structure of Conflict of Interest Management Tools Among Different Categories of Public Officials

4.3 Discussion of analysis results

Through a content analysis of the sections related to conflict of interest (COI) management in the ethical codes of British public officials, it is evident that the UK's ethical rules prioritize the complementary use of various COI management tools while emphasizing tailored approaches for different categories of public officials. This paper summarizes the key lessons learned from the UK's experience in formulating ethical rules for managing COI among public officials as follows:

It is crucial to establish a foundational moral framework that is a guiding principle for all public officials to adhere to in their public life. The Seven Principles of Public Life in the UK fulfill this duty and have endured the test of time. These principles are widely integrated into public life, which provides moral guidance and expectations for everyone who participates. On the other hand, they form the basis of all ethical norms, including codes of conduct, ensuring that other ethical texts do not contradict their spirit or wording and can be found within the ethical codes of various public officials and institutions. Moreover, moral principles should possess long-term stability, with infrequent revisions to the fundamental framework, while allowing for adjustments to specific

content based on the evolving needs of public life. For instance, the UK Standards Committee revised its description of "leadership" after revelations of bullying and harassment in Parliament, emphasizing treating others with respect.

Second, COI management tools are not independent entities; a practical and comprehensive COI management rule necessitates integrating five tools: prohibition, divestment, recusal, incompatibility, and disclosure. Various tools are appropriate for different contexts, and combinations are tailored to specific categories of public officials. Prohibition and divestment should be used cautiously. Ethical rules are designed to guide public officials on appropriately handling potential COI rather than imposing blanket bans or divestitures on all private interests. Overly stringent rules requiring significant sacrifices may risk deterring talented individuals from public service. Priority should be given to neutral measures, such as recusal and incompatibility tools. These measures create a firewall between public and private interests and safeguard against misuse of public resources by requiring officials to step aside or restrict their access to certain information. It is crucial to have clear recusal guidelines for senior officials in government departments and dedicated part-time and post-employment rules for civil servants. Lastly, disclosure tools should be utilized widely because of their low intrusiveness. Public oversight is built upon disclosure, enabling superior departments, ethical oversight bodies, and the public to access relevant information, assess COI, and determine necessary measures. The public can observe the process of making public decisions and who is involved in the decision-making process.

The Seven Principles of Public Life-based COI rules for public officials are crucial in shaping the image of the UK's public service and boosting public trust in its officials. The UK's reputation in the global fight against corruption is enhanced. However, the operation of the civil service system, which leans heavily on self-regulation, and the treatment of adhering to codes of conduct as best practices, coupled with insufficient attention to enhancing the effectiveness of oversight, can increase pressure on ethical standards. The vulnerability of the regulatory system can be exposed when conventions are breached and difficult to restore.

5　Conclusion

Managing conflicts of interest among public officials has emerged as a crucial aspect of international corruption prevention efforts, with a heightened emphasis on prevention, preemptive risk mitigation, and adopting more rational and forward-looking anti-corruption strategies aimed at stemming corruption at its source. The fragmented legal systems and moral codes scattered across the departmental regulations of public institutions are still a challenge for most countries. This paper explores and analyzes the relevant management practices employed by the United Kingdom to prevent conflicts of interest among public officials and offers insights and inspiration for the institutional development of conflict-of-interest prevention.

At its core, managing conflicts of interest is a fundamental aspect of ethical governance for public officials. It is imperative and effective to devise moral rules that are straightforward to comprehend, effortless to apply, and require minimal judgment in determining their applicability. The potential for moral laws to be misused for political purposes is minimized by this approach. On the one hand, when formulating rules for managing conflicts of interest, it is crucial to prevent public officials from making inappropriate decisions and avoid deterring talented individuals from entering the public sector due to concerns over potential encroachment on their private interests. On the other hand, public sectors should strive to codify the most crucial conventions and norms surrounding ethical standards into more formal procedures and rules, which is necessary to enhance regulatory efficiency and public trust.

References

[1] OECD.Managing Conflict of Interest in the Public Service:OECD Guidelines and Country Experiences[M].Paris:OECD Press,2005:13.

[2] Christine Trost and Alison L. Gash (eds.), Conflict of Interest and Public Life: Cross-National Perspectives. Cambridge: Cambridge University Press, pp.155–187.

[3] Rose C. 'Corruption and conflicts of interests in the United Kingdom', in Corruption and Conflicts of Interest , pp.150-166

[4] Peele, G., & Kaye, R. Conflict of Interest in British Public Life. In C. Trost & A. Gash (Authors), Conflict of Interest and Public Life: Cross-National Perspectives, Cambridge: Cambridge University Press. pp. 155-187.

[5] Bolleyer N , Smirnova V , Mascio F D , et al. Conflict of interest regulation in European parliaments: Studying the evolution of complex regulatory regimes[J]. Regulation & Governance, 2018.

[6] Commission on Standards in Public Life Report: Maintaining Standards in Public Life, 1 November 2021 ,https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1029944/Upholding_Standards_in_Public_Life__Web_Accessible.pdf

[7] Allen N,The Nolan Reforms and their Impact on the House of Commons. Unpublished PhD thesis, University of Essex, Colchester.

[8] Bolleyer N , Smirnova V . Parliamentary ethics regulation and trust in European democracies[J]. West European Politics, 2017:1-23.

[9] Gong Ting, Ren Jianming. Theory and Practice of Conflict of Interest Management [J]. Chinese Public Administration, 2012(10): 96-100.

[10] Whaley, J, Legislative Ethics: A Comparative Analysis, Technical report, National Democratic Institute for International Affairs.

[11] Zhuang Deshui. Research on Preventing Conflicts of Interest and Building an Incorruptible Government [M]. Xiyuan Publishing House, 2010. Pages 195-208.

[12] Messick, Richard E.'Policy Considerations When Drafting Conflict of Interest Legislation', in Jean-Bernard Auby, Emmanuel Breen, and Thomas Perroud (eds.), Corruption and Conflicts of Interest. A Comparative Law Approach (Studies in Comparative Law and Legal Culture). Cheltenham: Edward Elgar Publishing, 113–23.

[13] Mattarella, Bernardo Giorgio. 'The Conflicts of Interest of Public Officials: Rules, Checks and Penalties' in Jean-Bernard Auby, Emmanuel Breen and Thomas Perroud(eds.), Corruption and Conflicts OfInterest. Cheltenham: Edward Elgar, 30–38.

[14] Liu Wei. The Application of Content Analysis in the Study of Public Administration [J]. Chinese Public Administration, 2014, (06): 93-98.

[15] Rose-Ackerman, Susan. 'Corruption and Conflicts of Interest',in Jean-Bernard Auby, Emmanuel Breen, and Thomas Perroud (eds.), Corruption and Conflicts of Interest. Cheltenham: Edward Elgar, 3–14.

About the Author

Wenyu Li was born in Taiyuan, Shanxi, China in 1994. she is a doctoral student at the School of Law and Humanities, China University of Mining & Technology-Beijing, with her main research interests in the prevention and punishment of corruption in the public sector.