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James Downe
Richard Cowell
Cardiff University, United Kingdom
Karen Morgan
University of Bristol, United Kingdom

What Determines Ethical Behavior in Public Organizations: Is It Rules or Leadership?

James Downe is a reader in public management and director of the Centre for Local and Regional Government Research, Cardiff Business School, United Kingdom. His current research interests include local government performance regimes, political accountability, public trust, and the ethical behavior of local politicians. He has more than 10 years of experience conducting evaluations on local government policy and has published widely in international journals.
E-mail: downej@cardiff.ac.uk

Richard Cowell is a reader in environmental planning in the School of Geography and Planning, Cardiff University, United Kingdom. His research interests cover theoretical and political aspects of the relationship between public policy and sustainable development. He has written widely on issues of governance, knowledge and decision making, policy integration, public participation, and trust, with a particular interest in ethics regulation.
E-mail: cowellrj@cardiff.ac.uk

Karen Morgan is a research fellow in the School of Social and Community Medicine, University of Bristol, United Kingdom. She is currently working on a project piloting and evaluating interventions for male perpetrators of domestic abuse, and also on a project exploring experiences of female survivors of abuse. Previous work has included looking at the service needs of homeless women, and at the ethical framework governing local councillors in England.
E-mail: karen.morgan@bristol.ac.uk

Abstract: *Leadership is widely seen as having an important role in fostering ethical conduct in organizations, but the ways in which the actions of leaders intersect with formal ethics regulation in shaping conduct have been little researched. This article examines this issue through a qualitative study of the operation of the "ethical framework" for English local government, which entailed all councils adopting a code of conduct to regulate the behavior of local politicians. Studying local government provides an opportunity to examine how personal and managerial factors combine to influence ethical conduct and to analyze the ways in which ethical leadership is exercised through multiple people in leadership roles (politicians and managers). The article finds that organizations that exhibit consistently good conduct have multiple leaders who demonstrate good conduct but also act to preempt the escalation of problems and thereby minimize the explicit use of ethics regulation.*

Practitioner Points

- The actions of leaders are important in promoting good conduct and fostering an ethical culture.
- The promotion of good conduct within complex organizations can be enhanced when different categories of leaders work in concert.
- Leaders need to be willing to intervene informally to steer behavior in their organizations and resolve emerging problems rather than relying on formal regulatory mechanisms.
- The personal moral credibility of leaders can be very important in enhancing the effectiveness of formal ethics regulation.

Ethics is a key component of good governance (Perry et al. 2014) and has significant potential to affect public trust in all forms of government (Joyce 2014). Previous research has identified a number of factors that can shape standards of conduct within an organization, among which the role of leadership has attracted significant attention (Grojean et al. 2004; Steinbauer et al. 2014). Indeed, the ethical behavior of leaders has come to assume global importance, with leaders being implicated in high-profile ethical scandals and integrity violations (Hassan, Wright, and Yukl 2014; Tonge, Greer, and Lawton 2003).

Researchers are identifying an array of beneficial outcomes arising from "ethical leadership," including increased willingness of employees to use voice to improve their organization, greater employee job satisfaction and sense of well-being, and increased trust in organization leaders, both from employees and the public (see, e.g., Bedi, Alpaslan, and Green 2015; Hassan 2015; Wang and Van Wart 2007). Much effort has also been applied to delineate the actions and behaviors that leaders can undertake to enhance ethics, including aspects of leadership style that

create a culture in which good conduct is maintained (Huberts 2014; Lasthuizen 2008). Nevertheless, analysis of the impact of leadership and its role in fostering ethical behavior remains underdeveloped (Menzel 2015), especially in the public sector (Heres and Lasthuizen 2012; Van Wart 2003; Weinberg 2014), with insufficient testing of theory against empirical research compared with business ethics (Lawton and Doig 2005; Mayer et al. 2012; Perry 2015; notable exceptions are Hassan 2015; Hassan, Wright, and Yukl 2014). Moreover, while it is widely recognized that leaders can exert influence through their character and personal conduct as well as by taking managerial actions to regulate the conduct of others (through issuing guidance or processes of sanctions and rewards), there is relatively little research that considers the causal relationships between leaders, systems of ethics regulation, and resulting standards of behavior. Indeed, Six and Lawton (2013) suggest there is little theory about the best combination of value-based and compliance-based policies.

This article responds to these gaps by examining the roles played by leaders in shaping the ethical

performance of local governments in England. Local government is a vital focus for ethics research, given that local jurisdictions across the globe have democratic mandates and responsibilities for disbursing significant quantities of public funds. In addition, English local government has been subject to a period of intensified formal ethics regulation, including a reinforced role for codes of conduct. Consequently, local government in England is a valuable case study for considering our key research question: how do the activities of leaders intersect with the more formal, codified provisions of ethics regulation in promoting good conduct?

The structure of local government also makes it insightful for understanding the contextual conditions in which ethical leadership unfolds. Much literature in this area assumes an undue homogeneity to "the organization" or "the leader" (Menzel 2015; Van Wart 2003). Leadership/integrity research has been "relatively narrow in scope" (Palanski and Yammarino 2007, 171), often focusing on managers in public agencies (Hassan, Wright, and Yukl 2014; Lasthuizen 2008; Macaulay and Lawton 2006) in largely American organizations (Eisenbeiss and Brodbeck 2014) more than elected representatives (exceptions are De Vries 2002; Schumaker and Kelly 2011). Yet English local government combines managerial and political leaders and thereby enables us to understand multiple leaders' roles (e.g., shared leadership; see Crosby 2010) and the politics–administration dichotomy (Georgiou 2014) in promoting ethical conduct.

The structure of the article is as follows: In the next section, we review how existing research conceives of the relationship between leaders' activities and ethics regulations, with a particular focus on leadership studies. We argue that translational models of power (after Latour 1986) provide valuable conceptual and methodological sensitivity to how different elements combine in the exercise of agency in organizations. We then outline the institutional context of the ethical framework for local government in England. After elaborating our research design, we set out our findings on how those in leadership positions shape ethical behavior. In the final section, we offer some conclusions and suggestions for future research.

Conceptualizing the Role of Leadership
How Leaders Act on Ethics
Leadership can be defined as "a process of social influence whereby a leader steers members of a group towards a goal" (Bryman 1992, 2), and much of the literature linking leadership to ethics falls into two broad sets. As Bedi, Alpaslan, and Green (2015) explain, attention has been given to *defining the moral principles* or qualities that leaders ought to demonstrate and adhere to (the goals), but they also suggest a shift in research from issues of definition toward *identifying the contents and actions* of those who exercise leadership over ethics and capturing the influence that they exert.

An important conceptual construct in this agenda is ethical leadership, which is most commonly defined as "the demonstration of normatively appropriate conduct through personal actions

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and interpersonal relationships, and the promotion of such conduct to followers through two-way communication, reinforcement, and decision-making" (Brown, Treviño, and Harrison 2005, 120). Researchers have sought to further specify the concept by identifying its key components based on modes of promoting conduct, notably, being a *moral person* (exemplified by a leader's traits, behaviors, and how he or she makes decisions) and a being *moral manager* (when a leader creates moral codes for others through guidance, clear communication, and systems of rewards and discipline) (Treviño, Hartman, and Brown 2000). Similarly, De Hoogh and Den Hartog (2008) distinguish three elements of ethical leadership, consisting of morality and fairness, role clarification, and power sharing. For Hassan, Wright, and Yukl (2014), ethical leadership is made up of being an ethical role model, treating people fairly, and actively managing ethics in the organization. Overall, although grouped in different ways, the existing literature sorts the effects and actions of leaders in relation to ethics into two groups: those emanating from the nature and behavior of the leader as a person, encouraging emulation, and those arising from the systems and practices that they set up to regulate conduct on their behalf.

Although research on ethical leadership has grown rapidly, analysis in this field faces a number of issues. The first of these concerns whether ethical leadership is conceptually distinct from other leadership models such as transactional leadership or transformational leadership. The latter entails providing individualized consideration, intellectual stimulation, inspirational motivation, and idealized influence (Bass 1990). Thus, leaders are in a position to set an example and influence the behavior of people around them as people learn by observing and emulating attractive and credible models (Bandura 1977). With transactional leadership, leaders intervene only to set parameters, reward good performance, and discipline when standards are not met. It is often characterized as a more passive style of leadership. The ethical behavior of leaders also forms a key component of other leadership theories, including authentic leadership, spiritual leadership, and servant leadership (Eisenbeiss 2012; Yukl et al. 2013). For example, "ethical leaders use transactional forms of leadership and authentic leaders don't" (Kalshoven, Den Hartog, and De Hoogh 2011b, 52). If the relationship between such leadership theories is "blurred" and overlapping (Bedi, Alpaslan, and Green 2015), this is unsurprising given that most such theories—explicitly ethical or otherwise—are essentially concerned with agency, that is, how influence over others can be achieved.

This leads to a second issue: the criticism that ethical leadership constructs remain vague because in focusing on influencing mechanisms, they do not specify normative reference points that ethical leaders can use in promoting followers to behave ethically (Bedi, Alpaslan, and Green 2015; Eisenbeiss 2012). In principle, therefore, transformational leaders can promote ethical or unethical behavior. We do not seek to define normative principles of conduct in this article, although we note that researchers might do more to connect the modes of governance of ethics to the different objects (different norms and principles) to be governed (Jessop 1997).

On a prima facie basis, one might regard the categorization of ethical leadership as a sufficient explanatory construct, in that it represents an effort comprehensively to specify dimensions of agency. However, questions remain about how leaders combine action as "moral persons" and "moral managers" to influence ethical conduct (Kalshoven, Den Hartog, and De Hoogh 2011a). Statistical analysis can tell us the explanatory power of techniques of moral management, vis-á-vis being a "moral person," but not how leaders combine formal regulatory processes with social learning. One question in particular is that of "reach," which concerns how far leaders can shape what happens across organizations, including in the myriad contexts in which they are not co-present with others. Such concerns direct our attention to examining the use of ethics regulation mechanisms.

The Use of Ethics Codes

A common device for regulating conduct is to draw up an ethics code, which is a written framework used by organizations to specify and then shape what is regarded as appropriate conduct. The International City/County Management Association, for example, has had an ethics code in place for more than 90 years (Svara 2014). The use of codes, with supportive guidance and mechanisms of reward or sanction, has proliferated since the 1980s. Such techniques form a component of ethical leadership as examples of the practices required for being "a moral manager" (Huberts 2014). The growth in the use of codes has not, however, been accompanied by sufficient analysis into their impact and whether ethical behavior has improved as a result (Beeri et al. 2013; Jensen, Sandström, and Helin 2009), and there remains much debate about how codes intersect with other actions and regulatory institutions for ensuring compliance (Svara 2014).

The role of leaders is important here. At a basic level, in the private sector, it will fall to senior managers to decide whether to introduce ethics codes and what their form and content will be. Leaders may be aware that the adoption of an ethics code can be effective in increasing awareness of ethical principles and a useful management tool in fostering an ethical climate within an organization (Beeri et al. 2013; Treviño et al. 1999). However, how leaders effect the *implementation* of ethics codes warrant as much attention as adoption decisions (Svara 2014), and here the limited research available suggests a rather nuanced set of processes at work. In their meta-analysis of ethical leadership outcomes, Bedi, Alpaslan, and Green (2015) usefully unpack the "transactional" dimension of being a moral manager, embracing (1) active management (based on monitoring conduct, issuing rewards), (2) passive management (taking action after a problem), or (3) leaders adopting a more laissez-faire approach. They found negative correlations between ethical leadership and (3) but also (2) and some positive correlations with more proactive measures.

The sense emerging from ethical leadership research is that passive transactional approaches to influencing conduct, relying on regulation, are unlikely to be adequate (Eisenbeiss 2012), a finding that chimes with wider research on ethics codes. Codes have been criticized as being too abstract, coercive, and unworkable while producing red tape and restricting practical options (OECD 1996). Codes of ethics are also seen as insufficient to achieve change or govern conduct without other social processes. Ultimately, the success of codes is dependent on the culture of the organization (Ethics Resource Center 2005), "where people naturally do the right thing when faced with dilemmas" (Back 2006, 9). Leaders can play a significant role in helping set this ethical culture (Hassan, Wright, and Yukl 2014), as they have the scope formally to waive or less formally to ignore ethics codes (as with Enron; see Tonge, Greer, and Lawton 2003). Attention to the potential role of leaders shows that codes do not "act" unless interpreted and translated into actions by human agents.

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Our task is to trace the causal mechanisms through which leaders work with ethics regulation, and the outcomes that arise, to elucidate the predominantly statistical analyses of ethical leadership research to date (Bedi, Alpaslan, and Green 2015). In so doing, we can determine how the "moral person" dimensions of ethical leadership come to bear on managerial actions rather than viewing them as separate modes of influence. The importance of doing this becomes clearer, once we acknowledge both the complexity of ethics in organizations and the limits of codification.

Leaders, Codes, and Agency in Complex Organizations

Much of the research on ethical governance and leadership has taken a rather simplistic view of organizations. Those who are the leaders is assumed to be clear. They are few in number and occupy a clear hierarchical position of authority within an organization from which influence on conduct can be exercised. Indeed, in response to the potential existence of a multiplicity of ethical cultures in organizations, the role of leaders is to create a "unified climate," playing different roles at different levels and providing strategic leadership. There is some evidence to suggest that if leaders across different levels of the organization convey similar messages through training, this will create shared cognitions (Grojean et al. 2004). However, this simple and rather linear view of how agency is exercised faces two problems.

One is that organizations can embrace multiple normalization processes, acting on and through human agents positioned within heterogeneous networks. Local government, for example, embraces political and managerial leaders, and norms for judgment may emanate from conceptions of electoral mandate, party, and constituency (for politicians) or from professional values or divergent goals such as efficiency and delivery (for managers) (Cowell, Downe, and Morgan 2014). Thus, the enhancement of conduct across an organization can be seen not just as a simple issue of implementing a single code of ethics but also as a struggle to assert the importance of a particular set of principles in the face of other bases for judgment. In shared-power worlds, multiple norms must be navigated (Crosby 2010).

The second problem is that the codification of ethics in documented statements—as a basis for communication and regulation—can never fully capture and direct how decisions should be made across the

diversity of situations when ethical issues arise (Jensen, Sandström, and Helin 2009; West and Davis 2011). Applying principles to contexts often entails further reinterpretation. Moreover, there is potential for principles of good governance to conflict, such as the tensions between integrity, transparency, and efficiency (De Vries 2002; Van der Wal, de Graaf, and Lawton 2011). The ultimate expression of dilemmas arising from the incompleteness of moral principles is the so-called dirty hands debate (Newbold 2005; Walzer 1973), concerning the morality of overriding important ethical principles to achieve greater goals. One can imagine that such dilemmas fall heavily on those in leadership roles, especially in governments where multiple constituencies are involved.

Tracing the means by which agency is exercised over conduct in practice requires a conceptual and methodological perspective that can integrate the different effects of leaders (personal or through rules or other practices). A valuable approach, already used in other areas of business ethics (Jensen, Sandström, and Helin 2009) and public administration research (Feldman et al. 2006), is the conception of power as translation. For Latour (1986), it is unhelpful to conceive of power *in potentia*, as something inherently possessed by someone (e.g., a leader, or an idea or principle), as it may not automatically lead to anything. Rather, power is better analyzed *in actu*, as an effect resulting from (and revealed by) the translation of an order or principle into the actions of others. By focusing on agency as a social process of translation, we can observe the combination of elements that come together to align conduct and see this as a collective, composite process entailing an array of practices—"countless, often competing local tactics of education, persuasion, inducement, management, incitement, motivation and encouragement" (Rose and Miller 1992, 175)—linking the actions of leaders, others, and regulations.

Through such a perspective on power, it becomes clearer which individuals actually lead on ethics, in terms of whether their actions change the frame of reference for others and the basis of their authority (e.g., moral, political, or technical expertise). It may be that ethics codes give durability to social practices and extend the agency of leaders into domains where they cannot be present. Alternatively, we may find that leaders are more thoroughly implicated in shaping adherence to the regulations and that aspects of character have reinforcing effects—that is, the nature of moral management is shaped by the detailed interventions of moral persons.

The next section addresses the policy context in which leaders behave before examining the methods we used to assess the ways in which leaders can influence ethical behavior.

The Ethical Framework for Local Government in England

The emergence of the ethical framework for politicians in local government in England echoes international trends, as concerns about conduct and declining trust in public institutions have been translated into ethical codes, statements of values, and other organizational machinery for regulating conduct (Pharr and Putnam 2000). The 1997–2010 Labour governments were seeking to address public concerns about "sleaze" in political life as well as high-profile corruption scandals in a few local councils. One of its main interventions was to greatly reinforce the arrangements for regulating

conduct in local government (the ethical framework). Under the Local Government Act 2000, all English local authorities were obliged to (1) adopt a code of conduct to regulate the behavior of elected members (also known as councillors); (2) establish a register of members' interests, and (3) set up a standards committee to advise on the code, monitor its operation, and promote high standards of conduct. The act also created new bodies, notably, the Standards Board for England. Initially, the Standards Board took the lead role in the assessment and investigation of complaints, but when this task was decentralized to standards committees for each local council beginning in 2008, it adopted a more strategic regulatory role. It is important to note that the ethical framework was imposed on local government and its leaders and required them to adopt it.

Rather than being made the responsibility of a single leader, the ethical framework implicated an array of leadership roles within English local councils. On the political side, these were the council leader (usually taken from the dominant political group) but also the leaders of the other political parties. On the officer side, a senior manager called the monitoring officer had responsibility for the management of the ethical framework and reported to the chief executive in each council. Standards committees were required to include independent chairs and a proportion of independent members to separate them from political influence (Lawton and Macaulay 2014). Therefore, we see how the implementation of the ethical framework was shaped by leaders with different forms of authority—electoral, professional/legal, and the moral authority of "independence." Moreover, operationalizing the ethical framework had to take place within "a collection of agencies, laws and processes" that made up a wider integrity system (Six and Lawton 2013, 640), including internal organizational efforts and external actors such as financial auditors, rules governing political parties, and the justice system.

Methodology

The majority of the research on ethical leadership is statistical and cross-sectional in nature (Bedi, Alpaslan, and Green 2015; Hassan 2015), relying on surveys to measure ethical leadership and correlate it with effects (e.g., De Hoogh and Den Hartog 2008; Kalshoven, Den Hartog, and De Hoogh 2011b; Kolthoff, Erakovich, and Lasthuizen 2010; Mayer et al. 2012; Yukl et al. 2013). What remains deficient is research that moves from statistical associations to elucidating causal mechanisms. To address this, we have responded to the call for more detailed qualitative research (Hassan 2015) and used case studies to enable a deeper assessment of causal processes.

Our research site is English local government, which consists of 353 local councils spanning small district councils (in a two-tier structure in which responsibility for council services is split with county councils) to larger unitary and metropolitan authorities. Councils are predominantly financed by grants from the central government (about 48 percent), with the remainder made up of business rates (charged to local companies, about 25 percent) and council tax (charged to local people, also about 25 percent). To this field, we applied a multiple case study design (Yin 1984), centered on nine local councils.

Cases were selected purposively to embrace an array of contextual conditions and leadership situations deemed likely to bear on

patterns of conduct and their governance. Table 1 outlines the main variables that we used to select cases, and table 2 summarizes how these mapped onto each of our case studies. Structuring case study selection in this way was designed to provide a framework in which the causal effects of different leadership actions on conduct, the roles performed by ethics regulations, and the conditions that facilitated these effects could be teased out. The individuals and councils have been treated anonymously in all published output from this research.

This article reports on data gathered in 2008 and 2010, a pivotal period in the implementation of the ethical framework, when more responsibility was being devolved from the Standards Board for England to individual councils. Visits were made to nine case studies in 2008, and repeat visits were made to six cases (A, B, C, D, E, and F) in 2010; the abolition of the Standards Board meant that we were unable to revisit the remaining three case studies. The principal source of data was semistructured interviews with key informants, including council leaders and leaders of party groups, chief executives, monitoring officers, chairs of standards committees, a range of nonexecutive councillors from different political parties, and senior officers. We felt that it was important to gather the views of not just the formal leaders in the organization (both political and managerial) but also a range of followers (e.g., those councillors not in formal leadership positions) to gain a wider perspective on how conduct was shaped, embracing both those leaders who might be expected to engage in steering conduct and those subjected to such actions (Eisenhardt and Graebner 2007). Across the nine cases and two time points, 129 interviews were conducted, 111 of them face

to face and 18 by telephone. All of the face-to-face interviews were recorded and transcribed.

To operationalize our translational conception of power (Latour 1986), we adopted an interviewing approach that was agnostic about what shaped conduct and did not assume a priori that particular actors or ethics codes were the main drivers (Jensen, Sandström, and Helin 2009). We encouraged interviewees to detail how norms of conduct were shaped and transmitted in their council (Grojean et al. 2004), including how misconduct issues were identified and addressed, by whom, and with what effect. The effects of the ethical framework and the roles of leaders were certainly objects of analytical concern, but we drew information about their importance and agency both from answers to open-ended questions and from responses to specific questions posed about the code of conduct and political and managerial leaders.

We analyzed the interview data through a thematic coding technique (after Flick 2002), utilizing codes defined from the analytical framework and research focus, to enable comparability of analysis across the multiple case studies. The coding was aided by NVivo qualitative software, which facilitated the categorization and collation of text data subject to multiple codes (e.g., type of conduct problem, type of leader [politician, chief executive, monitoring officer], and type of action [informal advice, complaints procedure], etc.). In assembling the analysis, we draw on the causal relationships revealed by the coding exercise, such that quotations offered are both constitutive of the arguments we are making and illustrative of wider patterns (Mason 2002).

Findings and Analysis

We found evidence across our case studies of the roles that leaders play in promoting and reinforcing good standards of conduct. Numerous respondents referred to the ways in which key individuals in the council—chief executives, monitoring officers, and political leaders—shaped its standards of conduct. In effect, those in leadership roles displayed ethical leadership. We also found such respondents accepting responsibility for conduct that flowed from their formal leadership roles. The mechanisms that leaders used echo the main factors highlighted in existing research but also show the more complex ways in which leaders seek to achieve outcomes and the position of formal ethics regulation. We begin by examining the evidence on leaders setting an example.

Leaders Setting an Example

Setting an example (or role modeling) is about the visible actions of leaders in how they behave within an organization, and it is a key component of ethical leadership (De Hoogh and Den Hartog 2008; Hassan, Wright, and Yukl 2014). This behavior helps inspire others to emulate and support them. What is important here is "action" and not rhetoric. There needs to be no gap between what a leader says and what he or she does, as leaders can be hypocritical by outlining the importance of moral values for the organization but not behaving under these rules themselves (Greenbaum, Mawritz, and Piccolo 2015). We found those in leadership roles setting an example in a number of our cases, especially those councils sustaining high standards of conduct, with these actions being recognized both by those seeking to set such an example and by potential recipients of this lesson.

Table 1 Main Case Study Selection Criteria

Factors Likely to Affect Ethical Conduct	Selection Criteria or Proxy Measure
Size: Larger councils are likely to be better resourced to deal with ethical issues than smaller ones (Berman and West 1995)	Selected small, medium, and large councils, measured by population
Conduct history: Past problems with conduct may have a lasting effect (Greasley 2006)	Selected councils with few or no complaints under the ethical framework and those with large numbers of complaints, measured over the period May 2008 to March 2010
Management: Councils that are well managed may be more likely to display good standards of conduct	Selected councils with "good/excellent" and "weak" scores from the Audit Commission's Comprehensive Performance Assessment*
Socioeconomic makeup: The composition of the area may affect the ethical conduct of the organizations that serve them (Menzel and Benton 1991)	Selected councils with lower and higher than average levels of deprivation
Political leadership: Consistency and change in political party control may affect conduct	Selected councils controlled by different political parties, those that had been governed by the same party for a long time, and those that had experienced recent changes in control

*Beginning in 2002, councils were subject to Comprehensive Performance Assessments (CPAs). These were conducted by the Audit Commission and combined judgments about the performance of local services with assessments of a council's "corporate capacity" (its leadership, performance management, partnership working, and use of resources) to provide an overall score that was published in national league tables.

Table 2 Contextual Information on the Nine Case Study Councils

Case Study	Type of Local Authority	Size (population in thousands)	Conduct History (ethical complaints, May 2008–March 2010)	Management (measured using CPA scores)	Political History	Strength of Independents (percentage of independent councillors, 2006–11)	Thumbnail Sketch
A	District council	131	12	Excellent (2003–04, 2008)	Generally Conservative controlled, Conservative 2007–11	5%	A relatively affluent district in southern England with a mainly stable pattern of political control. The council had achieved excellent CPA scores and experienced very few cases under the code of conduct.
B	London borough	276	0	Good (2002–04), 3* (2005–06), 4* (2007–08)	Generally Labour controlled, no overall control 2006–10	10%	A London borough with pockets of affluence and deprivation in which the former dominance of a single political party had declined. The council had experienced good to excellent CPA scores and had been proactive in its approach to ethical governance. The borough had experienced no formal complaints under the code.
C	District council	119	25	Fair (2003–04), Good (2007)	Generally Labour controlled, no overall control 2003–11	32%	A district in the Midlands in a relatively deprived area where the traditional dominance of one political party had given way to turbulent change. The council was improving its CPA score over time. There had been a large number of complaints under the code, most of them among members and between officers and members.
D	District council	149	26	Fair (2003–04, 2008)	Mix of independent and no overall control, Conservative 2007–11	16%	A relatively affluent district in southern England with a largely rural area, which in recent years had seen growing single party control. The council had received "fair" CPA scores but had experienced problems with its corporate governance, including a large number of complaints under the code, most of them among members and between officers and members.
E	Unitary	334	138	Good (2002), Excellent (2003–04), 3* (2005–06), 4* (2007–08)	No overall control 1995–2007, Conservative 2007–11	8%	A unitary council in the north of England, covering a largely rural and affluent area, in which only recently had one party secured overall control. The council had achieved good to excellent scores in the CPA and many complaints under the code (mainly from parish councils).
F	Metropolitan borough	751	35	Good (2002–04), 4* (2005, 2007), 3* (2006, 2008)	Controlled by both Labour and Conservative over time, no overall control 2004–11	9%	A largely urban unitary authority in the north, serving an economically and ethnically diverse population, in which the former dominance of a single political party had given way. The council had achieved good to excellent scores in the CPA and had generated a large number of complaints under the code.
G	Unitary	176	36	Good (2002–04), 3* (2005–08)	No overall control over its existence	5%	A unitary council in southern England with a mostly affluent population, in which no single party had control. The council had recorded good CPA scores and had generated a moderate number of complaints under the code, although fewer than its parishes.
H	District council	94	109	Poor (2007), Fair (2009)	Generally Conservative controlled with Labour in control 1995–99	13%	A district council in the Midlands with an affluent population and a high level of stability in political control. The council had recorded poor CPA scores and had generated a very large number of complaints under the code, most of them by members against other members.
I	Metropolitan borough	225	2	Weak (2002–04), 2* (2005–08)	Controlled over time by all three main political parties, no overall control 2007–11	2%	A socially diverse and in places very deprived metropolitan area in northern England in which the former dominance of a single political party had declined. The council had achieved weak to fair CPA scores and a low number of complaints under the code.

Not making personal attacks was central in the ethical worldview of some, which supports the positive links between conscientiousness and ethical leadership identified by Kalshoven, Den Hartog, and De Hoogh (2011a). For example, the leader of council A was noted for refraining from shouting in the council chamber or making personal remarks: "[I] never ever personalize anything in a public meeting. You know … it doesn't matter whether it's a member or a constituent, never personalize anything. I feel very strongly about manners in council chamber … and at public meetings, wherever you are in public."

In council B, we saw something that most closely approached "values-based leadership" (Grojean et al. 2004), evidenced by a widespread recognition across interviewees that leaders promoted good conduct and, furthermore, that the organization should be defined by it. Many interviewees in council B commented spontaneously on the moral tone set by both the elected mayor and the chief executive, which supported and empowered the monitoring officer in taking a proactive approach to ethical risks. The chief executive explained, "There's been a very strong tradition of doing good by being good. Doing the right things and doing things right. Having integrity and ethics as being central to the politics and purpose of the place." This finding exemplifies the point that leaders are responsible for creating an environment for others to make the right choices (Brown 2007).

How easily the behaviors of those in leadership roles translate into followership was dependent on wider issues of status, expertise, and trust, especially in terms of senior officer support. In some councils, monitoring officers were positioned as "leading" on ethics in their councils. In council A, which generally exhibited good conduct, the monitoring officer was "recognized nationally as a leading light" on the ethical framework, in terms of knowledge, and in council B, too, the expert authority of the monitoring officer—a long-standing senior lawyer—was widely accepted by councillors as issuing good advice on ethical issues (see also Eisenbeiss 2012). In council H, however, the organization experienced a high number of member-on-member complaints that were mostly politically motivated. Rather than taking a proactive role in attempting to resolve the complaints informally, the inexperienced monitoring officer simply referred the cases to the Standards Board for England. A member of the cabinet (the council's decision-making body) being suspended for one month for failing to update his register of interests is an example of how the advice of a respected monitoring officer may have led to a different outcome.

What these cases begin to show is the diverse ways in which individuals as "moral persons" connect to the operation of moral management in the form of compliance with ethics regulation. Indeed, for our case studies that displayed good conduct most consistently, compliance with the code was not necessarily the motivating factor (to which we return later), and the actions of leaders—political and managerial—were not easy to separate from norms and conventions shaping "how politics is done" locally. For example, in case study A, the chief executive suggested that there was "by and large a good working relationship between the

members and politics doesn't get in the way most of the time," and rarely was there a need to bring cases under the ethical framework with a view to formal sanction.

The effects of role modeling and social learning emanating from leaders can also be seen in the perpetuation of conduct problems. In cases that had experienced large numbers of complaints under the code and/or ongoing conduct issues, the council leadership was often implicated in a number of ways. Some politicians expected their leader to take the lead in attacking the opposition, potentially placing them at greater risk of overstepping the line of acceptable conduct (in terms, say, of using respectful language) than anyone else. Certain conceptions of being an effective political leader, held in some competitive party political environments, do not readily equate with being an ethical leader, illustrating the dilemmas of multiple normalizing processes that we introduced earlier. Moreover, what was constitutive of wider ethical problems in some councils was that senior councillors had become involved in the making of complaints for political advantage. For example, in case study H, claims of noncompliance with the ethics code were used deliberately to undermine opposition parties, fueling "tit-for-tat" spirals of accusation. It was often the case that party and council leaders acted as the focus for complaints from opposition parties, insofar as opponents sought to damage the group in power by attempting to undermine its leaders by presenting their behavior as unethical.

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The effects that leaders can exert often became clear when individuals in leadership roles changed. Between 2008 and 2010, the political control of council C changed, and the new leader announced that his party group would take action to prevent the endless cycle of antagonistic ethical complaints. He explained,

> I think by going on record as saying in the Council that we would never take anybody to the Standards Board, I would hope that meant that nobody would then take us to the Standards Board, then that then spread out across. I think the environment … is massively better than it was two years ago. It's a lot more constructive and a lot more positive. … I won't say in harmony, but at least in constructive criticism which it wasn't before.

Being seen to discourage personalized tit-for-tat politics was often integral to the modi operandi of the more effective ethical leaders. Again, however, we can see the ambiguous relationship between achieving good outcomes and the deployment of formal ethics regulation.

Leaders Acting on Individuals
This ambiguity is apparent again when we turn to the second set of ways in which leaders acted on ethics—being a moral manager in dealing with others to persuade them to maintain high standards of conduct (Hassan, Wright, and Yukl 2014). It often meant working informally to resolve complaints prior to (or avoiding) deploying the formal ethics machinery. This included having a quiet word with politicians whose behavior was "sailing close to the wind" and giving

them an opportunity to improve. That these practices occurred more often in some councils than in others, and reflected the extent of conduct issues in each case, suggests a significant causal effect.

We saw extensive use of informal mechanisms of regulation by managerial leaders, notably in council B, which had a good reputation on conduct. Here politicians acknowledged that the chief executive "is very very skilled at managing concerns for members, whether they're executive members or whether they're backbench members. I'm sure that [the chief executive] deals with quite a lot of that stuff under the waterline, so we don't tend to see too much of it." In this council and others, leaders helped create an organizational environment in which people felt comfortable discussing potential ethical risks. In council G, the monitoring officer said that "where members have perhaps got involved where they shouldn't have done on an issue, then … the chief executive or myself would have a word with them."

In councils with conduct problems, leaders were less prepared to intervene to support better conduct or head off problems. In council C, the chief executive did not play an active role. The task of explaining to members why their behavior was unacceptable in public meetings fell entirely on the monitoring officer. He explained, "I don't have the time to spend nattering to people about minor issues in relation to 'do you know what so-and-so said?' 'Do you know what somebody else said?' In contrast to my predecessor, who spent a lot of time talking to members and being able to smooth things over sometimes."

We observed a complex network of personal actions—not always straightforward, hierarchical relationships between a single leader and his or her followers—involving different actors leading on shaping conduct in different councils and in different combinations. In council E, party group members (rather than the leader or monitoring officer) would have words with colleagues whose conduct was at risk of overstepping the line, and in council G, one group leader felt it his responsibility to take an informal role in acting on ethical issues outside his party. That leader explained, "intervene is not the right word, but just sort of gently say 'Look is there an issue? We need to talk about this.'"

We identified numerous incidents in which managerial and political leaders worked in concert to enhance the maintenance of good conduct. In council A, the chief executive explained that "me and the leader are a double act … we are the pivot between the members and the officers." In council I, the deputy leader explained,

> Quite regularly the whips will address an issue if they see that it's going to happen. A person thinking about going into business which would be contrary to their role as a councillor … an officer might say "This councillor's really pushing this personal interest" … and the whipping process resolves a lot of issues like that. And that's why I say the relationship between officers and senior members particularly has been quite reasonable because you know there's an informal feedback at an early stage and the parties usually deal with that.[1]

Our evidence also shows the value of leaders taking assertive steps to ensure that members attend training on ethics. In council B, the monitoring officer introduced annual reminders of training and "named and shamed" those who did not attend. In some cases, the push for training came additionally from the politicians. The joint leader of council F explained taking member training very seriously: "Our assistant whip leads on it. He's very keen to see member training rolled out … we have a proper induction package now for new members which is helpful." It was also clear that in councils that had persistent problems with poor conduct and repeated complaints under the code, training was more poorly attended or more sparely implemented.

A failure of leaders to act in concert could be problematic, as "[f]orces that pull the organization in different directions promote the existence of distinct subclimates, and a weak overall climate regarding ethics' (Grojean et al. 2004, 233). We found a number of examples in which party discipline was less assiduously monitored and aligned. In council H, "I think certain party leaders have the desire to nip things in the bud. I think other party leaders don't necessarily have the same desire." In council F, the joint leader argued, "Well in my view if the person in question was a member of my party we would be taking firm disciplinary action ourselves, that the party of which he is a member seemed … well their leader throws his hands up and says 'I've done all I can. I know what he's like.' I don't think that's good enough."

Mechanisms for exercising agency through party group discipline evaporated when councils had large numbers of independent councillors. By their very nature, independents have no group to discipline, and this situation was associated with conduct problems in a number of cases. Moreover, political independents often emerge and persist where there is a sense of antagonism toward preexisting public and political institutions such as the council, meaning that government-driven codes and organizational reputation are not prioritized in the judgments councillors make. In council C, the chief executive explained, "They're independent. Given away in the name isn't it? I don't believe they have a formal whip system. . . . As there's no party allegiance, you therefore lose that greater dimension." In council D, a councillor observed that the independent group took "a perverse delight in being named in the paper every so often." With independent councillors, all leaders are less likely to be seen as lacking legitimate authority and, no matter what their formal status, have little power in actu.

What Role for the Code?

The evidence presented here shows the variety of practices available to those in formal leadership positions to shape the conduct of their local council, with those exhibiting better conduct seeing leaders routinely applying and combining different practices. What is also apparent is a degree of ambiguity as to how far an agency is facilitated by "moral management"—enacting the formal requirements of the ethical framework. We now explore this issue in detail.

The first major pattern is leaders distancing themselves from the ethical framework. Many of the leaders interviewed, even in councils

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with reputations for good conduct, relativized the importance—or were critical—of the actual practices of the ethical framework. In council A, "The older members who have been around longer, there is more sort of built into them. Partly because of the ethical framework but also more culture of doing the right thing." "Additionality" was also hard to determine in councils that evidently reflected more frequently and openly on ethical issues. In council B, there was criticism from the monitoring officer that the national prescriptions were just a new set of rules on top of already detailed local provisions for good governance and open political conduct (see also Jensen, Sandström, and Helin 2009). The slow working of formal complaints procedures was also a frequent source of concern.

The second major pattern appeared in councils that maintained good standards of conduct. Here, a key set of practices was working informally when risks emerged to keep people away from the formal procedures governing ethical conduct. Of course, this might be taken as an example of the efficacy of formal procedures—the risk of sanctions drives action to avert misconduct—although it is notable that recourse to formal mechanisms was more associated with councils with persistent ethical problems. However, even in cases of serious misconduct, the ethical framework was just one part of an assemblage of elements brought together by leaders to translate their goals into action.

Supporting evidence can be found in two of the case study councils—A and B—which, although they generally displayed good conduct, had to deal with cases of individual councillors behaving in a criminal/fraudulent manner. In each case, a set of leaders including the chief executive, the monitoring officer, and party group leaders worked in concert to eject the people concerned from the council. These leaders were able to mobilize a conception of the council as an organization whose reputation mattered and that the individual risked tarnishing, with behavior clearly contravening acceptable norms. The council leader from case A explained,

> And I'm pleased to say she did when I asked her to resign … long before the Standards Board came in. When I heard what was happening I asked her to go. I'm pleased to say she went, too, it was her decision not mine but I would have asked her to go otherwise. To me it was blatantly obvious that she was not doing what a good … councillor should be doing.

The existence of the ethical framework was an additional ingredient in the making of arguments, but it was not pivotal, as some councillors were removed without invoking formal complaints procedures. Indeed, sanctions available under the framework might not, on their own, have enabled the people to be removed as councillors. The chief executive in case B summarized as follows: "I've had conversations with councillors making them resign, although I haven't had the power to make them resign." It was the combination of elements beyond the formal powers of the ethical framework that created power in actu—that is, led to change. Combinations of a palpable ethical culture with widely shared ethical norms, political party norms, identity and discipline, and the mobilization of action by people who were trusted and could themselves be seen as embodying good standards of conduct together constructed a line of acceptable behavior that errant councillors would recognize they had crossed.

In other councils, one or more of these elements was missing. Political and managerial leaders were more reluctant to intervene preemptively and relied on formal sanctions under the code of conduct. In many instances, however, these sanctions did not lead to significant change of behavior—typically in cases concerning treating others with respect and not using abusive language—as the councillors concerned did not take either the ethical framework, or the personal moral standing of those enacting complaints against them, as a legitimate basis for criticism.

The third major pattern is that, although effective ethical leadership demands a perception that leaders act fairly (Hassan 2014), it seems that the actions of effective leaders is not characterized readily by conceptions of fairness that demand a neutral, hands-off approach and deference to formal procedures. Instead, making judgments about conduct and ethics—as a form of practical reason—is part of the day-to-day repertoire of actions of effective ethical leaders (Lawton and Macaulay 2004). This is vital given that, as we discussed earlier, codified principles are never a complete basis for action or adjudication: they require application in complex, heterogeneous situations. A formal ethics code for the organization as a whole is only one set of rules or norms governing conduct and requires negotiation with the criminal justice system, party membership rules, and so on. We found that ethical leaders were prepared to act on individuals themselves directly and did not expect that the code to govern at a distance. Indeed, in council I, an officer perspective on politicians was that they "take their lead from their leaders to some extent … certainly the leader of the council is keen to exert his morals and influence on behaviors and has made it very clear that if there are issues he wants to know about them."

Conceptions of "fairness as detached/impartial/neutral" also help explain why it was that standards committees—created in each council to oversee the ethical framework and promote high standards of conduct—did not become ethical leaders in most of our cases. They were much newer institutions than other actors in the council and less certain in their status. Moreover, many of the chairs of these committees (which are recruited to be independent from the council) saw it as vital that they be detached from the councillors, not to engage or intervene on a personal level, in order to retain their legitimacy in assessing individual cases.

These findings open up a more fundamental reflection on the nature of leadership on ethics and the exercise of power. Standards committees, whatever their formal "powers," simply could not act "on the ground," proactively intervening in cases in the way that we saw both managerial and political leaders doing in those cases in which good conduct was the norm. Any "leadership" by standards committees was inevitably at the rather detached level as the promoters of abstract principles.

One component of ethical leadership is the opportunity to reward good ethical performance and apply discipline when standards are not met (e.g., Treviño, Hartman, and Brown 2000). However, the leaders in our case studies had few rewards for good behavior by councillors, and the formal sanctions were often perceived as inadequate. They could consist of providing an apology or, if regarded as more serious, lead to councillors being suspended for a period. Moreover, the status of the electoral mandate means that

misdemeanors identified under the code could not, in themselves, lead to councillors being ejected from the council. The uncertain power in actu of the ethical framework helps explain how those in leadership roles responded to it, which, in turn, reveals further insights about the roles of leaders in shaping conduct.

Conclusions

Our objective in this article has been to examine how the activities of leaders intersected with the more formal, codified provisions of ethics regulation in promoting good conduct. In so doing, we have responded to the call from Hassan, Wright, and Yukl (2014) for more research on the influence of specific leadership behaviors on the ethical conduct of subordinates and that of Menzel (2015) to assess whether ethical codes make a difference. Building on the predominantly statistically based research on ethical leadership, our analysis used detailed qualitative analysis to trace the causal processes by which different elements of ethical leadership have an effect on conduct. Our research confirms that the actions of leaders can be important in promoting good conduct and fostering an ethical culture (Beeri et al. 2013), by acting in ways that reinforce and maintain high standards of conduct and tackling emerging problems. However, we also demonstrate the importance of leadership through counterfactual cases—when poor conduct persisted, leaders were often directly implicated or failed to undertake the actions we saw in the better-performing cases.

Previous research has begun to interrogate which models of leadership or sets of actions are most effective at promoting good conduct. Some have argued that a values-based cultural approach is best (Treviño et al. 1999), while others have suggested that "role-modelling is considered the most crucial and influential means to foster followers' ethical decision-making and behavior" (Heres and Lasthuizen 2012, 458). One of the methodological merits of adopting a translational model of power and using it to trace actions and outcomes in the field is that it shows how different elements combine to effect agency and in what direction. We draw the following main conclusions.

We found that ethical leadership is more than simply complying with rules, such as the code of conduct; personal moral values are also important (Eisenbeiss and Brodbeck 2014) in setting a tone, encouraging emulation, and adding authority to regulatory action. Our study supports previous research that has emphasized the importance of leaders who "walk the talk" (Greenbaum, Mawritz, and Piccolo 2015), thus offering positive ethical role models. Moreover, especially perhaps in potentially conflictual, political environments like local government, personal moral credibility can help leaders enact more formal regulatory action. In effect, "moral persons" help make the tools of "moral managers" work.

Our second conclusion, following from the first, helps explain why the "transactional" dimensions of ethical leadership—issuing guidance, rewarding, sanctioning—have more ambivalent outcomes than the transformational dimensions (Bedi, Alpaslan, and Green 2015). Overall, we found that in councils that had maintained good conduct over long periods of time, there were leaders willing

> Political leaders can set an example through endorsing exemplary behavior, denouncing improper conduct, using rhetoric such as making speeches, and influencing their political group.

to intervene informally to steer behavior. Being an effective "moral manager" could entail acting to keep problems from escalating to a point that formal regulation might come into play. As tools of governance, codes of conduct "cannot substitute for dealing personally, courageously, reasonably, and creatively with the moral ambiguity that is the stuff of administrative life" (Chandler 1994, 155). "Treating people fairly" remains a relevant component of ethical leadership (Hassan 2015), but this is fairness demonstrated in interpersonal dealings, from respected individuals, rather than the procedural neutrality of formal regulation. Indeed, excessive reporting of "unethical behavior" can produce cynicism within the organization (Menzel 2007) and exemplifies concerns that investing authority in codified procedures can represent an abnegation of responsibility.

A particular reason for this—and central to our third set of conclusions—links to more fundamental issues with the governance of conduct through ethics codes. Codes are always simplifications and require careful interpretation to apply to the complex, heterogeneous settings of organizational life, and it is precisely where there is uncertainty that the qualities of particular organizational leaders become most apparent. Further effort to codify and define the multiple principles at work would not have improved this situation, or removed the need for effective practical judgment (Jensen, Sandström, and Helin 2009). However, leaders can help constitute and foster environments in which the informal exercising of practical judgment feels appropriate (see also Brown 2007).

The importance of this was further demonstrated by the organizational setting of our research—local government—where there are multiple networks of expertise, hierarchical position, and electoral authority with the potential to reinforce different ethical norms. Moreover, party political competition *within* local government organizations creates distinctive (and under-researched) challenges for ethical leadership, not least how leaders may become implicated in or accused of poor conduct as part of political advantage seeking. In such settings, our research shows that the relationship between leadership and conduct outcomes reflects how multiple leaders interact around ethical issues. Political leaders can set an example through endorsing exemplary behavior, denouncing improper conduct, using rhetoric such as making speeches, and influencing their political group. Managerial leaders can provide resources to show that they take the issue seriously by appointing officers to support training and process complaints. Our analyses also provide pause for thought on whether having multiple, overlapping processes governing conduct in organizations is necessarily a problem requiring rationalization. Against the thesis that "complexity = problems," our evidence suggests that it gives skilled leaders more elements to draw together to translate ethical principles into action. Such an argument warrants further testing in different contexts.

Note

1. The "whip" is an elected member given the role of maintaining the discipline of a political party, typically in terms of maintaining the party line on issues but here embracing conduct and reputation more widely.

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