

The cover features a background of interlocking gears in various shades of blue. A prominent yellow diagonal stripe runs from the bottom left towards the top right. The title is centered in the upper half, and the author's name is at the bottom.

# INTEGRITY MANAGEMENT IN PUBLIC ORGANIZATIONS

*Content & Design*

Alain Hoekstra



# **Integrity Management in Public Organizations:**

*Content & Design*

**Alain Hoekstra**

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Printed by: Ridderprint, Alblasterdam | [www.ridderprint.nl](http://www.ridderprint.nl)

Cover design and layout by: Publiss | [www.publiss.nl](http://www.publiss.nl)

**Integrity Management in Public Organizations:  
*Content & Design***

Integriteitsmanagement in Publieke Organisaties:  
*Inhoud & Vormgeving*

Thesis

to obtain the degree of Doctor from the  
Erasmus University Rotterdam  
by command of the  
rector magnificus

Prof. dr. A.L. Bredenoord

and in accordance with the decision of the Doctorate Board.

The public defence shall be held on  
Wednesday, November 9 at 13:00 hrs

by

Albert Hoekstra, born in Heerlen

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*"If the soul is left in darkness, sins will be committed. The guilty one is not he who commits the sin, but he who causes the darkness."*

[Victor Hugo, 1862]

*I dedicate this book to my sons, Max and Julius Hoekstra; that they may discover their passions.*

## Preface and Acknowledgements

Wassenaar, 07 September 2022

In addition to the people acknowledged below, I want to express my sincere gratitude to the members of the reading committee of this dissertation. I thank them for their time and willingness to read and evaluate my work, and for being leading examples of good scholarship: prof. dr. Lucas Meijs (Erasmus University Rotterdam, the Netherlands), prof. dr. Karin Lasthuizen (Victoria University of Wellington, New Zealand), and prof. dr. Zeger van der Wal (Leiden University, the Netherlands).

Wassenaar, 25 May 2022

As a public administration student at Erasmus University, my interest in public integrity was triggered when I studied the 'New Public Management' (NPM) trend in the mid-1990s. NPM can be characterized as an (initially Anglo-Saxon) neo-liberal trend to reinvent and transform the public sector by running it in a much more businesslike way. As a visiting student at Victoria University of Wellington I studied how NPM was implemented, in the most rigorous way, in New Zealand. Among New Zealand scholars I sensed serious concerns about the negative impact of NPM on the public ethos and integrity.

The aroused fascination for public integrity resulted in a long-term and diverse professional career as an integrity expert working for the Dutch Ministry of the Interior and Kingdom Relations (hereafter, Ministry of the Interior). In addition to drafting integrity legislation and policies, the design, implementation, and evaluation of integrity policies was part of my work. In the aftermath of the fraud in the building and construction industry in the Netherlands the Ministry of the Interior decided to expand integrity legislation for government organizations and to establish a National Integrity Office (Bureau Integriteitsbevordering Openbare Sector) to support government organizations in fostering integrity in 2006. This office, of which I was one of the founders, not only provided practical integrity tools but also organized network meetings, courses, and training sessions for integrity professionals.

At its ten-year anniversary, in 2016, the Ministry of the Interior unfortunately decided to disband the National Integrity Office. With some colleagues I was invited to come and work for the new Dutch Whistleblowing Authority (Huis voor Klokkenuiders), which had to be built up from scratch. Certainly, the first couple of years turned out to be quite a challenge for this developing institution. The occupational transfer to the Whistleblowing Authority also changed my work as an integrity expert. Not only because more emphasis was required on typical whistleblowing-related themes like reporting and investigation procedures, but also because this authority serves both the public and the private sector.

During my professional career I gradually developed a scholarly interest in integrity management. At first to structure my own knowledge and experiences, and later to expand my understanding of how integrity can be managed within public organizations. This scholarly interest resulted in a position as an external PhD candidate at the



Department of Business-Society Management at Rotterdam School of Management, Erasmus University.

The continuous encouragement and patience of my two PhD supervisors, Muel Kaptein and Leo Huberts, have been crucial in the process of writing my dissertation. Dear Muel and Leo, the enormous knowledge and experience you have acquired during your lifetime academic careers on ethics and integrity and your willingness to share it with me gave me the feeling of standing on shoulders of giants. How can I possibly thank you enough for being my 'pillars' over all these years? I also learned from the co-authors I worked with on numerous articles, book chapters and research reports on integrity management related topics. I am thankful to all of you for your inspiration, cooperation, and shared wisdom. Although this list is not exhaustive, I would like to mention Edgar Karssing, Alex Belling, Jitse Talsma, Paul van Tongeren, Marcel Becker, Leonie Heres, and André van Montfort in this regard.

Moreover, the feedback I received from peers at international conferences has been instructive and inspirational for my academic work. The opportunity to meet and connect with foreign scholars, to learn about their research interests, and to reflect on their work has been very useful. On 'practitioners' level the participation in various international ethics and integrity related networks like for instance the OECD's worldwide network for Senior Public Integrity Officials (SPIO), the European Network for Integrity Professionals (ENIP), the Network for European Integrity and Whistleblowing Authorities (NEIWA), and the European Partners Against Corruption (EPAC) has been most inspirational. I would also like to thank The Hague Academy for Local Governance for the opportunity to teach and train international delegations of civil servants on integrity management for more than ten years now. All these international activities gave me a good impression of the efforts other countries make to enhance public integrity.

My work as an integrity expert gave me the opportunity to come into daily contact with public organizations (study subject of this dissertation) on matters related to integrity management (study object of this dissertation). These contacts provided me with deep-rooted insights into the state of affairs (and issues) concerning integrity management within the Dutch public sector. Moreover, the many discussions I had with colleagues and other experts in the field helped me to develop a broad perspective on integrity management. As my (former) colleagues I would especially like to thank Alex Belling, Marijntje Zweegers, Ed Fenne, Jitse Talsma, Kristien Verbraeken, Dominique Hagenauw, and Petra Melis for their friendship and support.

My employers have also encouraged me to complete this dissertation. Their support and understanding, but foremost their acknowledgement of the relevance of my research projects, have been crucial in this trajectory. Thank you for your confidence and for the interest you have shown in my research activities.

It is only fair to admit that writing a dissertation in combination with a full-time job and parenthood has been a continuous challenge. Certainly, finishing a dissertation amidst a global pandemic was not easy. In this final stage I frequently visited '*Slangenborg*', a guest house under Benedictine regime located in the countryside. Slangenborg turned out to be a sanctuary and provided the structure I needed to study in a disciplined and concentrated way. The hours I have put into this dissertation kept me from spending time with my family and friends. Dear Olga, thank you for your love and kindness, flexibility, and support during all these years. And to my two beloved sons Max and Julius: sorry for not being around as much as I should have been. I will make amends and I am looking forward to it.



# Table of Contents

<b>Preface and Acknowledgements</b>	6
<b>Chapter 1. Introduction</b>	15
1.1 Integrity in Public Service	16
1.2 Research Questions and Aim	17
1.3 Introducing Key Concepts: Integrity and Integrity Management	18
1.3.1 Integrity	18
1.3.2 Integrity management	19
1.4 Methods	20
1.5 Dissertation Outline	21
• Understanding integrity policy formation processes	22
• The institutionalization of integrity in local government	23
• Integrity management as interorganizational activity	23
• Content and design of integrity systems	24
• The integrity of integrity programs	24
1.6 Academic and Practical Relevance	24
References	26
<b>PART 1. DUTCH NATIONAL INTEGRITY POLICIES: ORIGINS, KEY ACTORS, AND DEVELOPMENTS</b>	31
<b>Chapter 2. Understanding Integrity Policy Formation Processes</b>	33
Abstract	34
2.1 Introduction	35
2.2 Kingdon's Streams Model	36
2.3 Research Methodology	37
2.4 The Dutch Context	38
2.4.1 Before 1990: A historical overview	38
2.4.2 Actors in the Dutch integrity system	39
2.5 The Multiple Stream Model Applied	41
2.5.1 Phase 1: Initial formalization (1990–1995)	41
2.5.2 Phase 2: Gradual regulation (1995–2003)	42
2.5.3 Phase 3: Discontinuous value-oriented expansion (2003–2007)	43
2.5.4 Phase 4: Reorientation and reprioritization (2007–2010)	45

2.6 Summary and Implications	47
2.6.1 Practical implications	48
2.6.2 Theoretical implications	48
References	50
<b>PART 2. HOW ORGANIZATIONS INSTITUTIONALIZE AND MANAGE INTEGRITY IN PRACTICE</b>	55
<b>Chapter 3. The Institutionalization of Integrity in Local Government</b>	57
Abstract	58
3.1 Introduction	59
3.2 Institutionalizing Integrity	60
3.2.1 Two views on managing integrity	61
3.2.2 Framework for analyzing integrity	61
3.2.3 Formal and informal institutionalization strategies	62
3.2.4 Formal vs. informal institutionalization: The debate	63
3.3 Methods	65
3.4 Findings	66
3.4.1 Integrity policy in the Netherlands	66
3.4.2 Typology of institutionalization	69
3.4.2.1 Formal approaches: Offices and projects	69
3.4.2.2 Informal approaches: Passive and reactive	71
3.4.3 The integrity office(r) and other players	72
3.4.4 Critical conditions for institutionalizing integrity	73
3.5 Conclusions and Recommendations	75
References	78
<b>Chapter 4. Integrity Management as Interorganizational Activity</b>	83
Abstract	84
4.1 Introduction	85
4.2 Definitions, Literature, and Theories	86
4.2.1 Definitions	86
4.2.2 Cooperation literature	86
4.2.3.1 Institutional theory	87
4.2.3.2 Cultural theory	87

<b>4.3 Methodology</b>	88
4.3.1 Data collection	89
4.3.2 Data processing and analysis	90
<b>4.4 Research Findings</b>	91
4.4.1 What integrity partnerships have in common	91
4.4.2 How integrity partnerships differ	93
4.4.3.1 Integrity Workshop (Sharing Instruments)	93
4.4.3.2 Integrity Pool (Sharing Capacity)	94
4.4.3.3 Integrity Forum (Sharing Experiences)	95
4.4.3.4 Integrity Megaphone (Sharing Influence)	97
<b>4.5 Discussion</b>	98
4.5.1 Follow-up research	100
4.5.2 Practical and policy considerations	101
References	102
<b>PART 3. TWO THEORY-BASED INTEGRITY MANAGEMENT FRAMEWORKS</b>	107
<b>Chapter 5. Content and Design of Integrity Systems</b>	109
Abstract	110
5.1 Introduction	111
5.2 Theory: Constituting Elements of an Integrity System Assessment Framework	112
5.3 Methodology: Case-studies in Munich, Antwerp, and Amsterdam	113
5.4 Research findings	114
5.4.1 Institutional contexts in Germany, Belgium, and The Netherlands	114
5.4.2 Applying the integrity system assessment framework; identifying shortcomings in local integrity systems in Munich, Antwerp, and Amsterdam	115
5.5 Conclusion and Discussion	119
5.5.1 Practical recommendations for local government organizations	119
5.5.2 Practical recommendations for the national level	120
5.5.3 Related research	121
5.5.4 Suggestions for further research	121
References	123

<b>Chapter 6. The Integrity of Integrity Programs</b>	127
Abstract	128
6.1 Introduction	129
6.2 Distilling Integrity Norms for Integrity Programs	130
6.3 Specifying and Underpinning Integrity Norms for Integrity Programs	131
6.3.1 Intentional wholeness	131
6.3.2 Organizational wholeness	133
6.3.3 Societal wholeness	134
6.3.4 Processual wholeness	135
6.4 Discussion and Implications	137
References	139
<b>Chapter 7. Conclusions, Recommendations and Reflections</b>	143
7.1 Introduction	144
7.2 Conclusions	144
7.3 Recommendations	147
7.3.1 Recommendations for the national level	147
7.3.2 Recommendations for the organizational level	148
7.4 Reflections on Relevance	149
7.5 Reflections on Limitations	150
7.6 Reflections on Avenues for Future Research	151
References	153
<b>Annexes</b>	155
About the author	156
PhD Portfolio	157
Scientific publications	157
Conference presentations	158
Sideline activities	158
Summary	159
Samenvatting (summary in Dutch)	161





The background features a large, faint number '1' on the right side. The left side is filled with a complex pattern of overlapping, semi-transparent gears of various sizes and orientations, creating a mechanical and industrial aesthetic.

# CHAPTER 1.

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INTRODUCTION

## 1.1 Integrity in Public Service

Integrity is an important quality to have, both in our individual lives and in our professional careers (Huberts, 2014). Integrity is also recognized as an indispensable and highly prized quality for public organizations. Integrity is a crucial aspect of 'good governance' (Head, 2012; Huberts, 2014). Its significance is formulated in terms such as the enhancement of public trust (Lewis & Gilman, 2012), the reinforcement of the constitutional state (Cowell, Downe, & Morgan, 2011), the improvement of economic growth, social stability and service delivery (Bossaert & Demmke, 2005), and the effectiveness of government activities (Maesschalck & Bertok, 2009). Public integrity presumably even contributes to the happiness of citizens (Veenhoven, 2018).

On a less abstract level I argue with Heres (2016) that public integrity is crucial because of the special powers vested in public organizations (for instance to use violence, for issuing passports, permits and licenses, and for granting subsidies and social benefits). Public integrity is also a condition for attaining and maintaining public support and thus for the legitimacy of the government and its administration. Moreover, upholding integrity and leading by example is important for public organizations and their officials if they want citizens to respect the law and to act according to the public morale. And finally, as public organizations are funded by taxes, taxpayers have the right to expect that their money is spent in the proper way and in accordance with the values of transparency, accountability and integrity.

Given the above, the integrity of public organizations should be undisputed. Therefore, specific integrity measures are required by (national) law and recommended by (international) guidelines. Despite the imposed measures, integrity violations are frequent reoccurring events within the public sector. Hence it is important to expand our knowledge and understanding of public integrity management. Certainly, since public integrity management is a relatively new and complicated research topic there is much more to be learned.

The complexity of managing public integrity is partly caused by the unclarity of the concept of integrity itself (Six, Van der Veen, & Kruithof, 2012). And as there exist many different types of integrity violations (Lasthuizen, Huberts, & Heres, 2011), which are often the result of a combination of different types of causes (Kish-Gephart et al., 2010), there are no simple 'one size fits all' solutions and single 'silver bullet' interventions to foster integrity. On the contrary, managing integrity requires a diverse set of integrity measures and instruments that are well organized and fit together (Kaptein, 2015; Maclean, Litzky, & Holderness, 2015).

Although there is growing awareness that such a well-organized an integrated integrity management approach is to be preferred (Maesschalck & Bertok, 2009; Six & Lawton 2010; Van Montfort, Ogric, & Huberts, 2018) there is limited knowledge of what such an approach should entail (Huberts & Van Montfort, 2020; 2021). Thus far, most studies have focused on singular aspects of integrity management, like ethical leadership

(Heres, 2014; Dobel, 2018), ethics and dilemma training (Svara, 2007; Van Montfort, Beck, & Twijnstra, 2013; Warren, Gaspar, & Laufer, 2014), whistleblowing (De Graaf, 2010; Kaptein, 2022), oaths of office (Bowman & West, 2021), codes of conduct (Kaptein & Schwarz, 2008), and confidential integrity advisors (De Graaf, 2019). In general, it seems that scholarly attention to organizational integrity is still rather underdeveloped and that researchers have not yet taken up in a central way the challenges of maintaining a sustained commitment to integrity (Fiorito & Ehrenhard, 2019).

Given the importance of public integrity, the responsibility of public organizations to foster integrity and the complexities of managing integrity in public organizations, the research omissions referred to indicate that it is necessary to expand our knowledge and understanding of public integrity management.

## 1.2 Research Questions and Aim

Public organizations are expected to meet high integrity standards. However, recurring integrity violations indicate that this is quite a challenge. The complexities of integrity management combined with the research omissions in this field signify that there is room for increasing our knowledge and understanding in this area and lead to the following general research question of this dissertation: ***How to manage integrity in public organizations.*** Various themes are relevant in this regard, starting with attention to the origins and developments of integrity policy processes, the institutionalization and management of integrity of public organizations in practice, and the evaluation of integrity systems and programs based on insights and criteria derived from the literature. The overarching research aim of this dissertation is to advance scholarly as well as practitioner knowledge and understanding in the field of public integrity management, and how this can be improved. The following sub-questions are formulated in line with the central research question and aim: ***What characterizes the origins and developments of Dutch public integrity policies, how do Dutch public organizations institutionalize and manage integrity in practice, which criteria can be derived from the literature to judge the quality of integrity systems/programs, and what overall recommendations can be made in this regard?***

The dissertation is divided into three parts. *Part 1* addresses the first sub-question and covers Chapter 2. It provides insights into the origins, actors involved, and the developments of Dutch national integrity policies (and legislation) in the period 1990-2010. Analyzing national integrity policies is important as these policies determine the parameters of integrity management of individual organizations. But since these are only 'minimum requirements', that are not based on a coherent and systemized national integrity policy or strategy (GRECO 2019; Netwerk Goed Besturen, 2021), individual organizations are -to a large extent- responsible to make their own decisions regarding the content and design of their integrity management approach. Consequently, differences can be expected among public organizations in this regard, which makes research into how integrity is actually institutionalized and managed in practice, and how this could be improved, interesting and relevant.

*Part 2* analyzes how public organizations actually institutionalize and manage integrity in practice and describes different (internal and external) approaches. This second part of the dissertation addresses the second sub-question and is covered by Chapters 3 and 4. Chapter 3 focuses on how integrity is institutionalized within Dutch municipalities. Mapping out different approaches followed, as well as pointing out their positive and negative sides, may help organizations to reflect on their own approach, and on alternatives that could be considered. For many organizations, however, it turns out to be a challenge to develop, implement, and maintain adequate integrity policies on their own. Therefore, it may be beneficial to cooperate with similar organizations in this regard and to establish or join 'integrity partnerships'. The existence and working of these partnerships is explored in Chapter 4. Both chapters present empirically-based insights on how integrity is managed. The focus is not so much on the content but on the design (how it is organized and institutionalized) of integrity management.

*Part 3* addresses the third sub-question and covers the Chapters 5 and 6. Whereas part 2 describes approaches that are being used in practice (empirically-based), this part presents two theory-based integrity management frameworks. Both frameworks combine content and design aspects of integrity management. Chapter 5 presents an integrity framework that is based on effectiveness criteria which is also used to evaluate the integrity systems of three international cities. Chapter 6 presents an integrity framework based on normative criteria. These frameworks provide guidance for the content and design of organizational integrity systems/programs. In addition to similarities, there are also certain differences between the two frameworks. These differences and similarities will briefly be discussed in the concluding Chapter (7) of this dissertation. Inspired by the research findings and in line with the ambition to also make a contribution to the policy practice, the practical recommendations (fourth sub-question) are also presented in Chapter 7.

## **1.3 Introducing Key Concepts: Integrity and Integrity Management**

In this section the two main concepts of this dissertation, being integrity and integrity management, are briefly introduced.

### **1.3.1 Integrity**

In recent decades integrity has become a core value that has gained a lot of attention in both the public and the private sector (Boatright, 2011; De Graaf & Macaulay, 2014; Van Montfort, Orgic, & Huberts, 2018). Despite this heightened attention to integrity, it still remains a troublesome and unclear concept (Six, Van der Veen, & Kruihof, 2012), with many faces (Audi & Murphy, 2006), lacking scholarly consensus (Robinson, Cadzow, & Kirby, 2018), and resisting an easy definition (Cox et al., 2003). As such integrity is regarded as an ambiguous, un-fixated, and nebulous term (Karssing, 2006), and what Godfrey and Hatch (2007) call a 'tortured concept'.

Huberts (2014) points out that it is possible to distinguish at least eight different views or perspectives on integrity. Huberts' own definition of integrity refers to (acting in) 'accordance with relevant moral and legal values and norms'. This is a rather general and commonly accepted definition that is also used (implicitly or explicitly) in this dissertation. Another prominent definition refers to integrity as wholeness or completeness. This is in line with the Latin word "integritas" that etymologically refers to a state of wholeness, as in being complete, unbroken, united, and entire (e.g., Cox, La Caze, & Levine, 2014; Hartman, Wolfe, & Werhane, 2008; Heywood, Marquette, Peiffer, & Zúñiga, 2017). This focus on wholeness, as either a direct or indirect notion of integrity, is also referred to in literature reviews on integrity (Montefiore, 1999; Robinson, Cadzow, & Kirby, 2018; Huberts, Kaptein, & De Koning, 2021). This view on, or definition of, integrity comes to the fore in chapter six which focusses on the wholeness of integrity programs.

Huberts' (2014; 2018) definition of integrity as acting in accordance with relevant moral values and norms also seems to relate to this notion of wholeness. After all, the adjective 'moral' in his definition emphasizes the relational aspects of integrity, which makes it subject to a wider evaluative community (Brown, 2005; Calhoun, 1995; Reynolds & Bowie, 2004). As such, integrity is not primarily a matter of individualistic tastes, preferences, values, or opinions. On the contrary: what integrity entails is collectively determined by society (Heywood & Rose, 2015). This is especially demonstrated when integrity violations occur, which often lead to strong feelings of public disapproval and discontent (Huberts & Van Montfort, 2020). In other words, behavior -certainly of public officials- should be 'whole' and in accordance with societal expectations.

### ***1.3.2 Integrity Management***

As there are many different types of integrity violations (Lasthuizen, Huberts, & Heres, 2011), which are often the result of a combination of different types of causes (Kish-Gephart et al., 2010), simple 'one size fits all' solutions and single 'silver bullet' interventions to foster integrity do not exist. On the contrary: enhancing and safeguarding integrity requires a diverse set of integrity measures and instruments, such as: a code of conduct, an integrity office(r), integrity training, risk analysis, integrity regulations, ethical leadership, whistleblowing procedures, trusted persons, investigative and corrective policies for misconduct, and pre-employment screening (Ferrel, LeClair, & Ferrel, 1998; Kaptein, 2015; Maclean, Litzky, & Holderness, 2015; Van Montfort et al., 2018; Weber & Wasieleski, 2013). Moreover, as different organizational actors are responsible for these different instruments and measures (e.g., HR, Legal, Audit, IT, Finance, Works council, Communication, etc.) it is crucial that these actors work together. Cooperation based on a shared integrity vision and ambition are key to ensure a coherent integrity management approach (OECD, 2020).

In this line, and inspired by Constantinescu and Kaptein (2019), integrity management -as the process of enhancing and safeguarding organizational integrity- can then be defined as: the systematic, coherent, and iterative determination of what the integrity criteria of

an organization should be, and the development, implementation, and monitoring of the interventions to meet these criteria. This definition of integrity management both interconnects and transcends Paine's (1994) 'compliance' and 'integrity' strategies and does much more justice to the institutional and processual aspects of integrity management. Moreover, this coherent and integrated perspective on integrity management is consistent with the latest developments in the field (ISO, 2014; Jeurissen, et al. 2012; Kirby & Webbe, 2019; Maesschalck & Bertok, 2009; OECD, 2017; Six, Van der Veen & Kruithof, 2012; Van Montfort et al., 2018) and resonates in the following chapters of this dissertation.

## 1.4 Methods

The data for this dissertation is collected via in-depth semi-structured interviews, the analysis of formal policy documents, and literature research. The chapters in this dissertation each report on a particular subset of the data. Chapter 2 follows an unobtrusive research approach and provides a meta-analysis of the developments of Dutch national integrity policies (in the period 1990-2010) based on both primary and secondary sources.

Chapters 3 and 4 are primarily based on interviews, and are grounded in empirical data. Both chapters follow an inductive approach based on the experiences of interview respondents and systematically analyze the obtained data in accordance with conceptual categories or typologies that are constructed based on the obtained data. For chapter 3, fifteen interviews were conducted with local government officials directly involved in and responsible for embedding integrity in their organizations. A code tree was developed to analyze the interview transcripts. For chapter 4, thirty interviews were conducted with functionaries directly involved in integrity partnerships. A data matrix was used to analyze the interview transcripts.

Chapter 5 presents a theory-based framework for integrity systems which is used to evaluate and compare the integrity systems of three large international cities. This framework contains seven core elements which, according to the literature, constitute a complete and effective integrity system. The evaluation of the cities' integrity systems is based on a combination of interviews with eighteen public officials and the analysis of policy documents and existing research data. Chapter 6 presents a newly-developed normative framework for integrity programs that consists of twelve norms that are deduced from the concept of integrity.

The research is strongly focused on the Dutch public sector and more specifically on local government organizations. Public integrity has been a topic on the Dutch administrative and political agenda since the early 1990s. Because of this substantial period of time, it could be expected that enough integrity policies, practices, and experiences could be researched in the Dutch public sector. Another advantage to focusing on the Dutch public sector is that public organizations are relatively free to make their own decisions regarding the content and design of their integrity management approach. Consequently,

interesting differences could be expected in this regard among public organizations. The strong (but not exclusive) focus on local government organizations is justified because of their responsibility for large public expenditure in service provision areas that are often known for their vulnerability to integrity violations (Six & Huberts, 2008). Furthermore, local integrity risks are increased by the trend to decentralize public responsibilities from the national to the local level, and by the intense contact with citizens at the local level, where officials may have greater vested interests based on social ties that can influence public decision making (Transparency International, 2021). Local government organizations are therefore forced to think about how to address these vulnerabilities and risks and how to prevent integrity violations (Huberts & Van Montfort, 2020 and 2021). As always, one has to be aware of the limitations of the chosen research focus and its value to other contexts (this will be addressed in chapter 7).

This dissertation addresses both the integrity measures and elements (content) public organizations should consider implementing and how these could be organized (design). The interlocked cogs and wheels on the cover of this book represent a set of well-organized and interconnected integrity elements that fit together and constitute a well-functioning integrity management framework.

## 1.5 Dissertation Outline

The three subsidiary parts i.e., the research questions of this dissertation, are addressed in five subsequent chapters. Although the chapters are related, they have been written as individual articles over a period of approximately ten years. The five research articles are all published in *Public Integrity*, and for each article I am the leading researcher and author. *Public Integrity* is a double-blind, peer reviewed, journal of the American Society for Public Administration. This journal was selected because of its specific (and one of a kind) focus on public integrity. *Public Integrity* was also selected because of its global readership and its relevance for both scholars and professionals which relates to the ambition to advance scholarly as well as practitioner knowledge in the field of public integrity management. In retrospect I acknowledge that it is probably more common and desirable when writing a dissertation to publish articles in various academic journals instead of in just one. The wish to publish a consistent series of articles for the same (relevant) readership, but (I must admit) also the benefits of getting used to a certain publication process, prompted me to choose *Public Integrity*.

Each chapter has its own theoretical grounding, methodological setup and analytical angle. The chapters align in terms of the overall topic of integrity management in the public sector, but show differences in the terminology used and conceptualization. This signals how the chapters build on and enrich each other, and how the line of reasoning has matured over time because of new insights from previous chapters, and new insights and publications in the field. Sometimes terms have been used as synonyms. The terms 'integrity systems' (chapter 5) and 'integrity programs' (chapter 6) are for instance used interchangeably in this dissertation.

Table 1.1 reflects the outline of the dissertation and how the chapters relate to the different parts. Per chapter, the table also specifies the data sources used, the methods applied, and the status of publications. Readers will notice that the sequence of the chapters does not always match the publication dates of the research articles. The reason for presenting the chapters in a slightly different sequence is that this leads to a more comprehensible research narrative. The content of the research chapters (2-6) is explained in more detail below.

**Table 1.1** Outline of the chapters

Part	Research question	Chapter	Data source	Status and result
1. Policies	RQ1. What characterizes the origins of and developments in Dutch public integrity policies?	2. Understanding integrity policy formation processes.	Meta-analysis of official policy documents, evaluations, and related research publications.	Published in <i>Public Integrity</i> (2014). Leading author. Presents four chronological integrity phases.
2. Institutionalization and management	RQ2. How do Dutch public organizations institutionalize and manage integrity in practice?	3. The institutionalization of integrity in local government.	Interviews with 15 local government integrity officers combined with document analysis.	Published in <i>Bestuurswetenschappen</i> (2010) and in <i>Public Integrity</i> (2012). Leading author. Presents six types of integrity institutionalization.
		4. Integrity management as interorganizational activity.	Interviews with 30 participants in integrity partnerships combined with document analysis.	Published in <i>Public Integrity</i> (2016). Leading author. Presents four types of integrity partnerships.
3. Frameworks	RQ3. Which criteria can be derived from the literature to judge the quality of integrity systems/ programs?	5. Content and design of integrity systems. Evaluating integrity systems in local government.	Interviews with 18 public officials of three international cities, combined with literature research and document analysis.	Published in <i>Public Integrity</i> (2022). Leading author. Presents a framework for assessing and advancing integrity systems that is based on seven main criteria.
		6. The integrity of integrity programs.	Literature research.	Published in <i>Public Integrity</i> (2021). Leading author. Presents a normative framework for assessing and advancing the integrity of integrity programs that consists of twelve (sub) criteria.

## **Chapter 2. Understanding integrity policy formation processes**

Analyzing national integrity policies (and how these develop over time) is important for at least two reasons. Firstly, these policies (issued by the Ministry of the Interior) are to be complied with by all administrative levels and thus of influence on how integrity is managed within government organizations. Secondly, it can be expected that analyzing the origins and developments of Dutch national integrity policies, but also the conditions that influenced these policies, creates valuable insights for policy advisors to shape future integrity policies. Chapter two, titled *'Understanding integrity policy formation*



*processes*, contains a historical reconstruction of the origins and developments of the Dutch national integrity policies (for the period 1990-2010) and identifies the main actors involved in this process. The reconstruction is based on a meta-analysis of official policy documents, evaluations, existing research, and similar sources. Kingdon's (2010) stream model is used to analyze, structure, and explain these developments (which sometimes turn out to be gradual and sometimes abrupt), resulting in four chronological phases. The first two phases concern the (rules-based) formalization and regulation of integrity (1990-2003), followed by a more values-based third phase (2003-2007). The fourth phase (2007-2010) is labelled reorientation and reprioritization. It is a rather indecisive phase, but what stands out is an emerging attention to political integrity that, before, was somewhat disregarded, and also to whistleblowing.

### ***Chapter 3. The institutionalization of integrity in local government***

One of the characteristics of the Dutch national integrity system is that local governments remain to a large extent responsible for the content -and certainly for the design- of their own integrity policies. Although changes in national integrity policies (such as changes in the Civil Servants Act) have consequences for local integrity policies, local administrations can decide how to implement these policies. This triggered me, as a follow up question, to examine how local government organizations actually manage integrity. Chapter three *'The institutionalization of integrity in local government'* focuses on the organizational aspects of integrity and how integrity is managed and institutionalized within municipalities. That chapter addresses the process of transferring integrity ambitions into intended outcomes by means of support structures, specialized agencies/officers, and formalization processes. Systems theory (Von Bertalanffy, 1968) and institutionalization theory (Scott, 1995) are used as theoretical frameworks, whereas grounded theory (Glaser & Straus, 1967) is used as the method to analyze and categorize fifteen coded in-depth interviews with local integrity officers, resulting in an integrity institutionalization typology. The six types found are: centrally and decentrally organized integrity offices; internally and externally organized integrity networks; and two types (reactive and passive) of integrity approaches that are based on the complete delegation of the responsibility for integrity to line-management. Mapping out these different approaches, as well as pointing out their positive and negative sides, may help organizations to reflect on their own approach and on alternatives that could be considered.

### ***Chapter 4. Integrity management as interorganizational activity***

The previous findings on external integrity networks are further researched and explored in chapter four *"Integrity management as interorganizational activity"*. This chapter describes if, and how, organizations cooperate with peer organizations to manage integrity. As many government organizations, certainly the smaller ones, often lack the resources (e.g., time, budget, and expertise) to design and maintain adequate integrity policies and systems, external cooperation with peers might offer a solution. Using institutional (Scott, 1995; Zucker, 1987) and cultural theory (Douglas, 1970) and based on empirical research, 23 different Integrity Partnerships were mapped and analyzed

via a data matrix (Miles & Huberman, 1994) resulting in four categories: the Workshop (sharing integrity instruments), the Pool (sharing integrity capacity), the Forum (sharing integrity knowledge) and the Megaphone (sharing integrity influence). This categorization offers a first overview of existing forms of interorganizational cooperation on integrity management. It identifies the characteristics per category, as well as the practical benefits and pitfalls of cooperation, and it provides a basis for future research in this under-researched area of integrity management.

### ***Chapter 5. Content and design of integrity systems***

In 2020 the Dutch parliament commissioned an international comparative case study into the content and design of local integrity systems which resulted in the fifth chapter of this dissertation, called "*Content and design of integrity systems*". This chapter presents a framework that contains seven theory-based elements constituting an effective integrity system, that is used to evaluate the integrity systems of the cities of Amsterdam, Munich and Antwerp. The seven elements of the framework are: attention to and clarity about integrity, ethical leadership, a balanced rule- and value-based integrity strategy, integrity policies, organizational arrangements, and critical reflection on what matters and works. The chapter not only provides insights into the completeness of the integrity systems in the three researched cities, but also into the most prominent differences and similarities, and into the different administrative contexts that are of influence on these systems.

### ***Chapter 6. The integrity of integrity programs***

As in the previous chapter, most research develops and applies effectiveness criteria for assessing integrity programs and systems. The norms developed in the sixth chapter "*The integrity of integrity programs*" are however grounded on normative criteria, signifying what a 'good' integrity program would be, based on the concept of integrity itself. As the word "integrity" originates from the Latin "integritas" and either directly or indirectly refers to a state of wholeness, wholeness can be regarded as an elementary and overarching notion of integrity. From this perspective, the following four norms for integrity programs are deduced: intentional wholeness, organizational wholeness, societal wholeness, and processual wholeness. Each of these norms is operationalized into three subnorms and six indicators, which results in an evaluative framework for assessing and advancing the integrity of integrity programs.

## **1.6 Academic and Practical Relevance**

This dissertation aims to advance scholarly and practical knowledge in the field of integrity management in the public sector. It combines empirical observations on how integrity is managed in reality (descriptive), with theoretical insights, and recommendations on how to improve integrity management (prescriptive). Theoretically, it complements and brings together the loosely coupled literature on integrity management from both Public Administration and Business Administration. Despite differences between these two disciplines, the cross-fertilization of insights seems to be valuable.

The predominant focus of this dissertation is on the organizational aspects of integrity management which have not received much research interest for a long time. It is the aim of this dissertation to enrich this particular body of knowledge and to trigger other researchers to reflect and build on the methods that are used to manage integrity and on the presented frameworks that could be used to evaluate integrity systems and programs. Both frameworks combine content and design aspects of integrity management and emphasize the necessity of the integration (and interconnectedness) of their composing parts. Whereas the first framework is based on effectiveness criteria, the second framework is built on normative criteria. The differences and similarities between both frameworks require further academic reflection. In the same way as the possibility of integrating both frameworks.

In a more practical sense, this dissertation provides insights that can be used by integrity officers and others who are involved in the process of improving public integrity. It offers policy officers insights which can be used to better predict and influence future integrity policy processes. It may also help integrity officers to reflect on the various methods there are to institutionalize integrity management within their own organizations and how they could benefit from integrity partnerships. The presented frameworks could also be used by policy and integrity officers, for instance as a checklist to assess integrity programs or systems. Despite the strong (but not exclusive) focus on the Dutch context, it is certainly the ambition and the expectation that the presented insights are also valuable in a broader context.

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The background features a dark blue field filled with various sizes of semi-transparent gears. Overlaid on this are several bright yellow geometric shapes, including triangles and trapezoids, creating a dynamic, industrial aesthetic.

# PART 1.

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DUTCH NATIONAL INTEGRITY POLICIES:  
ORIGINS, KEY ACTORS, AND DEVELOPMENTS



The background features a large, light gray number '2' on the right side. On the left side, there are several overlapping, semi-transparent gear shapes in various shades of gray, creating a mechanical or industrial aesthetic.

# **CHAPTER 2.**

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## **UNDERSTANDING INTEGRITY POLICY FORMATION PROCESSES**

## Abstract

The increase of attention to integrity in the public sector has been accompanied by growing interest in integrity as a field of inquiry. As yet, analyses of integrity policy as a change process have not been part of the research agenda. Insight into the actors, factors, and circumstances that influence policy change could lead to more realistic goals and offers opportunities for improving public integrity. This study applies Kingdon's model of policy change to reconstruct and analyze the changes in Dutch integrity policy. Besides integrity breaches, it turns out that intensive monitoring of policy implementation, personal commitment of high-level policy entrepreneurs, and the expectations of the policy community are all preconditions for accomplishing substantial policy change. This chapter demonstrates that policy change theory is useful both for analyzing and influencing integrity policy developments.<sup>1</sup>

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<sup>1</sup> This chapter is previously published as: Hoekstra, A. & Kaptein, M. (2014). Understanding integrity policy formation processes: A case study in the Netherlands of the conditions for change. *Public Integrity*, 16(3), pp. 243-263.

## 2.1 Introduction

According to Bowman and Williams, “the issue of ethics in public service is as old as government itself” (1997, p. 517). Awareness of the importance of ethics and integrity in public organizations and among civil servants is certainly not new. Integrity is seen as a precondition for good governance. Public arena ethics are a prerequisite to citizen trust (Lewis and Gilman 2005), reinforce the constitutional state (Cowell, Downe, & Morgan, 2011), and contribute to economic growth, social stability, and service delivery (Bossaert & Demmke, 2005).

In the past two decades, ever more attention has been given to integrity worldwide. Central governments and other institutional players both national and international have increasingly taken measures to promote integrity (Huberts, Anechiarico, & Six, 2008a). Efforts to promote integrity have often been triggered by ethical breaches and by extensive media coverage generated by scandals (Anechiarico, 2005; Menzel, 2009; West & Berman, 2004). In the meantime, much has been written about the state of affairs in integrity research (Huberts et al. 2008a; Lawton & Doig, 2005; Maesschalck, 2004; Menzel, 2005a), but many studies still focus on theoretical and conceptual questions.

Attention has also focused on specific integrity measures, such as codes of conduct (Walton, 2000), training (West & Berman 2004), and the use of integrity surveys (Kaptein, Huberts, Avelino, & Lasthuizen, 2005). What is missing from the stream of empirical research, however, is any systematic analysis of integrity policy formation processes. National studies limit themselves to descriptions of, or comparisons between, integrity systems and institutions (Huberts, Maesschalck, & Jurkiewicz, 2008b; Organization for Economic Cooperation and Development, 2008), or overviews of differences in current integrity policies and legislation (Bossaert & Demmke, 2005).

Obtaining insight into the nature and causes of the dynamics of change in integrity policy, however, is also important. This focus can enable policymakers to better comprehend the unpredictable dynamics of policy formation and decision-making, thereby leading to more realistic governance goals and offering more possibilities of influencing these processes. For researchers, studying the development of integrity as a policy process would broaden the current academic engagement with integrity.

Public policy and administration sciences encompass a diversity of theories and models for studying policy change, such as the punctuated-equilibrium theory (Baumgartner & Jones, 1993), the wheels-of-time theory (Namenwirth, 1973), and Kingdon's (2010) stream model. Punctuated-equilibrium theory emphasizes the effect of shifting policy monopolies on policy change. According to this approach, the entry of new actors in the arena can lead to instability and abrupt change. But since the integrity community in the Netherlands is relatively stable, this theory did not seem to be appropriate for the present discussion. And because Namenwirth's wheels-of-time theory is most suitable for studying policy changes over a period of about 50 years, it did not fit with the 20-year history of formal integrity policy in the Netherlands. This study, then, utilizes Kingdon's

multiple-stream model, which has often been applied in public administration studies (e.g., Maesschalck, 2002a and 2002b). The model emphasizes the often chaotic and unpredictable reality of the policymaking process, but increases manageability through its description of the regularities in the process. Moreover, it enables a chronological reconstruction and explanation of policy change over time.

In view of the lack of attention to integrity policy development as a change process, and the potential value such insight might yield for practitioners as well as researchers, two central questions are asked in the present study: How useful is Kingdon's model of policy change for reconstructing and analyzing the development of integrity policy? What are the preconditions for making substantial progress in integrity policy development?

The policy of the Dutch central government was selected as the object of analysis because integrity has occupied a key position on the political and administrative agenda in the Netherlands since the early 1990s (Becker, Van Tongeren, Hoekstra, Karssing, & Niessen, 2010; Hoekstra, Belling, & Van der Heide, 2008). The developments are empirically described below in chronological order and in four distinct phases. The analysis offers insight into the factors, actors, and circumstances that influenced the process, and offers an explanation for developments in Dutch integrity policy.

## 2.2 Kingdon's Streams Model

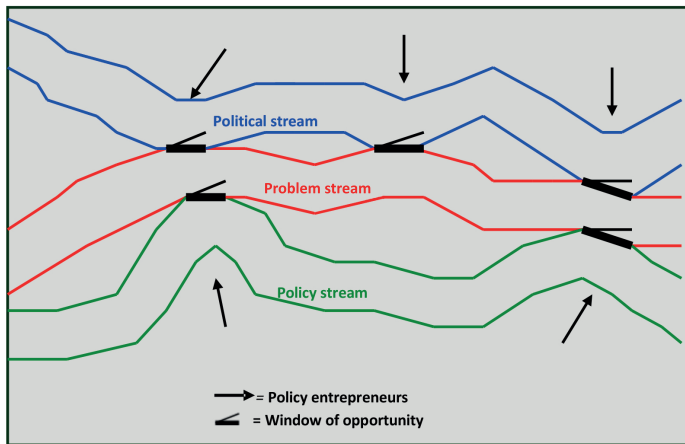
The work of Kingdon is well known in the disciplines of public policy and administration. The first edition of his most important work, *Agendas, Alternatives and Public Policies*, was published in 1984. In it Kingdon describes how the occurrence of societal problems (problem stream) sometimes converges with the political commitment to address these problems (politics stream) and with the availability of suitable, and sufficiently supported, policy solutions (policy stream). Such convergence creates an opportunity for change (window of opportunity), but does not always happen automatically or predictably. So-called policy entrepreneurs are important in this process. Entrepreneurs are stakeholders of different kinds who are prepared to invest in the policy they stand for. They wait for the right circumstances to present a problem, then try to place it (higher) on the agenda or to push their solution to the forefront in order to initiate a link between the three streams. Kingdon describes the streams as independent of each other, and all determined by their own particular interests and dynamics. The policy stream, for instance, continuously generates— quite apart from actual societal problems or the political demand for specific policy solutions—a great number of ideas and alternatives that lie in wait for the right moment at which to be seized.

This chaotic “garbage can” process (Cohen, March, & Olsen, 1972) is in sharp contrast with the previously accepted rational model of policy- and decision- making. The earlier approach assumed a systematic, coordinated, and predictable process that evolves in a series of logically ordered, sequential steps and offers a few well-defined alternatives from which decision-makers can make a thoughtful selection appropriate to the

perceived problems. Kingdon's model also deviates from Lindblom's incremental model (1959), which describes policy change as occurring in gradual steps and does not explain why or how abrupt changes suddenly take place.

Figure 1 portrays the asynchronous course of the three streams. It is only when all three streams converge, with the aid of policy entrepreneurs, that a window is created and significant change is made possible. If the streams do not, or only partially, converge, change will fail to occur or will have an incremental character.

**Figure 1:** Asynchronous Streams & the Origin of Windows of Opportunity



Note: The model has been adapted from Van Walraven et al. (2002, p. 14).

Asynchronous Streams and Origin of Windows of Opportunity

Source: Adapted from van Walraven et al. (2002: 14).

## 2.3 Research Methodology

The research summarized in this article focuses on the development of the Dutch government's central integrity policy in the period from 1990 to 2010, with specific attention to elements of the policy that pertain to the civil service. Thus, the focus is neither on the policy of specific government institutions and sectors nor on the issue of political integrity. Political integrity was excluded because it has received significantly less attention in the Netherlands, which explains the less formalized policy, and the lack of periodic, large-scale research on political integrity.

The study is descriptive in that it gives a chronological account of the development of integrity policy as characterized by distinct phases. Kingdon's model is used to explain the causes or circumstances that led to the various policy changes. The work can be described as a formative analysis in that it focuses largely on the course of policy formation (Van Thiel, 2010) instead of on policy content, concepts, or systems.

Existing materials were drawn upon an approach sometimes referred to as “unobtrusive research” (Van Thiel, 2010: 117–123). This strategy is well suited to describing developments over time. The project’s use of a large number of publications can be seen as meta-analysis. The materials can be further classified as primary and secondary sources. The primary materials were not produced for research purposes, and include policy documents, white papers, legal texts, and other official government publications. The secondary materials include prior research findings, such as policy studies, reviews, and inventories. The distinction between different phases was based on extant accounts of the development of Dutch integrity policy (Becker et al. 2010; Hoekstra et al. 2008).

## 2.4 The Dutch Context

The Netherlands is a constitutional monarchy with a population of more than 16.5 million. The government executes a number of tasks on behalf of the citizens, to which end it has approximately 1 million civil servants at its disposal (Ministerie van Binnenlandse Zaken, 2010). Compared to English-speaking countries, the Netherlands has a larger state establishment (Gwartney, Holcombe, & Lawson, 1998; OECD, 2009), but also a better functioning one (Social and Cultural Planning Office 2004), and, according to Transparency International (2011), a stronger reputation for integrity. These relationships hold globally: The Netherlands is, even among rich countries, characterized by a relatively large state, a medium- to high-functioning government, and high levels of integrity.

The fact that serious attention was not given to integrity in the Dutch government until the beginning of the 1990s does not mean that the issue was ignored earlier. The attention it received until then was, however, incidental, and policy consisted mostly of unwritten agreements and voluntary measures. The following historical overview of the issue of integrity in this period illustrates how attention to integrity gradually became more formalized.

### 2.4.1 Before 1990: A historical overview

Just as the well-known Sieneese paintings of “good and bad governance” of the fourteenth century were intended to remind rulers of the importance of integrity (Starn, 1994), similar exempla virtutis from the late Middle Ages can be found in Dutch government buildings (Van den Heuvel, 2007). This does not detract from the fact that during the seventeenth and eighteenth centuries there was evidence of decadence and office-seeking by government officials and governors. Holders of public office were inclined to let their self-interest prevail over that of the state and, just like the traders of the time, were strongly mercantile in spirit (Bekker, 1996; Knevel, 2001).

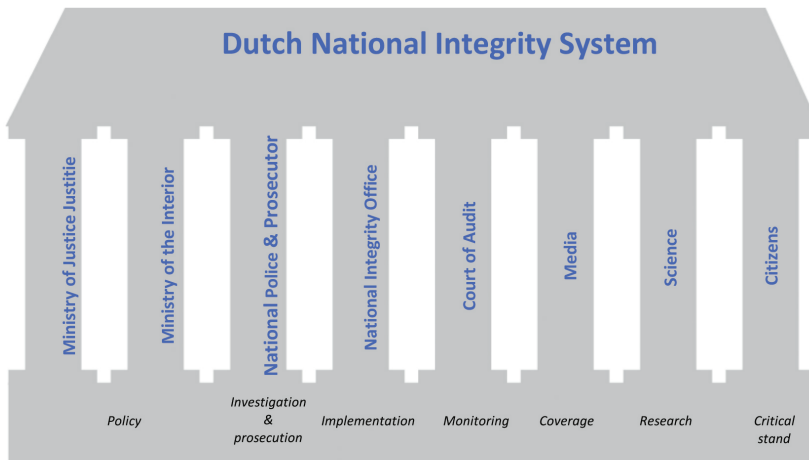
Van der Meer and Raadsschelders (2003) indicate that interest in integrity gradually increased from the late nineteenth century on through the ongoing process of democratization and emancipation of the citizenry. After World War II, the expansion of the public sector, accompanied by an influx of “new” civil servants—often with a commercial background and therefore unfamiliar with the specific norms and values



of public service—led to greater attention to the issue of abuse of office. In the 1960s and 1970s, there were fears that the civil service would develop into an unwanted, and independent, fourth power, in addition to the classical triune division of political power. In the 1980s and 1990s, the introduction of New Public Management led to concern about erosion of the public sector values underlying administrative integrity (Bovens, 1996; Van der Meer, & Raadsschelders 2003).

Despite the gradual deepening of the attention given to integrity in the period directly prior to the 1990s, the government's agenda was focused on functional-rational implementation and efficiency issues (Veldheer, 1999: 2-5). Thus, it concentrated on the objectives, means, instruments, planning, and outcomes of governance, and gave only limited attention to ethical considerations (Huberts, 2005). This, incidentally, does not apply only to the Dutch situation. For quite some time in the United States, for example, public administration was also characterized by a technical-rational administrative approach (Adams and Balfour 1998). Indeed, Efficiency, economy and effectiveness have been the hallmark values of modern public administration. . . . Public officeholders . . . were expected to be men and women of high moral character. Thus, there was little reason to be concerned about the need to add a fourth "e"—ethics—to this holy trilogy. But times change. (Menzel, 2005a: 155). This change took also place in the Netherlands.

**Figure 2:** The Dutch National Integrity System



### 2.4.2 Actors in the Dutch integrity system

The diverse range of actors that promote integrity and combat corruption in any country comprise part of what Transparency International refers to as a National Integrity System (Pope, 2000). Figure 2 portrays the Dutch system and the most important actors who have played a role in the development of the country's integrity policy.

From a policy perspective, the Ministry of Justice is responsible for anti-fraud and anti-corruption policy. Increased international political attention and a number of sensational fraud and corruption scandals have emphasized the importance of anti-fraud and anti-corruption legislation (Ministerie van Justitie, 2005). The Ministry of the Interior (hereinafter cited as Ministerie van Binnenlandse Zaken) is responsible for integrity policy, which has a more preventative character. The minister prescribes rules and regulations with respect to integrity policy that are embedded in the Dutch Civil Servants Act, and monitors the implementation of policy by means of periodic reviews and inquiries. In addition, the minister has the facilitating role of developing and providing guidelines for government organizations. In the event that concrete cases of fraud or corruption (or other serious integrity violations) present themselves, the Department of Internal Investigations of the National Police makes inquiries that could lead to prosecution by the public prosecutor.

The National Office for Promoting Ethics and Integrity in the Public Sector— or, in short, the National Integrity Office—is an independent agency that supports governmental bodies in the design and implementation of integrity policy (Hoekstra et al. 2008; Menzel, 2007). It does so by providing training and courses, developing ready-to-use instruments, and facilitating exchanges of information and expertise.

The Court of Audit is an independent monitoring and research agency and, as such, an important actor. It oversees the operation of the democratic system, its purpose being to ensure the lawful, effective, efficient, and ethical functioning of the government and to review and improve related government agencies. Since the mid-1990s, it has monitored the state of integrity in the central government (Algemene Rekenkamer, 2010).

In addition to these institutions, three other actors have a role in the integrity system: the media, the scientific community, and the citizenry. The Netherlands has an independent, multiform press that closely follows and monitors the conduct of public officials (Van den Heuvel, 2007). Media reports have generated extensive attention to a great many integrity-related cases. On the basis of the Public Disclosure Act, the media increasingly submit requests to scrutinize expense claims, moonlighting jobs, and the salaries of both elected and nonelected officeholders.

Research on integrity and integrity policy can likewise contribute to effective and ethical public administration by shedding light on the nature and scope of the state of affairs regarding national policy. It also offers insight into the advantages and disadvantages of certain strategies and can therefore lead to recommendations with regard to the implementation of policy. Menzel (2005b) observes that scholarly interest in integrity has increased worldwide and that this trend is likely to continue. The same growth in interest is apparent in the Netherlands (Van den Heuvel, Huberts, van der Wal, & Steenbergen, 2010), and has manifested itself in an increasing number of publications on the topic by a diverse range of scientific bodies and institutes (Becker et al. 2010; Huberts & Nelen, 2005; Karssing, 2006).

Finally, citizens have become more critical and articulate over the years. People want proof of the impeccable integrity of government functionaries (Van den Heuvel, 2010). The increased concern in this sphere reflects the critical attitude of many citizens toward those who govern the country (Van den Heuvel, 2007). There is certainly evidence of a “shift in the public’s capacity and desire for scrutiny and insistence upon adherence to moral standards defined by appropriate behaviors from those holding public authority” (Huberts et al. 2008a: 239).

None of the structural components of the Dutch system is unique. Compared to some other countries, the Netherlands seems, however, to be different in its use of the term “integrity.” Whereas other countries define integrity narrowly as the absence of corruption and fraud, Dutch institutions have gradually developed a broader and more positive definition (Karssing, 2006). Instead of a limited focus on preventing misuse of power, there is also a more encompassing emphasis on the moral aspects of working for the government and of the culture of public organizations. The focus is not merely on what to avoid, but also on encouraging officials and organizations to do what is right, to act responsibly, and to make better judgments.

## 2.5 The Multiple Stream Model Applied

The discussion in this section divides developments in Dutch integrity policy into several distinct chronological phases and gives a systematic overview of the most characteristic developments of each phase within the three streams. The treatment of each phase concludes with a brief analysis that provides insight on why changes occurred or did not occur in a specific period.

### 2.5.1 Phase 1: Initial formalization (1990–1995)

#### *Problem and Politics Streams*

Serious concern with the question of integrity, and attention to its structural aspects, began in the early 1990s. The problem of organized crime, and of attempts by criminal organizations to corrupt elements of the government apparatus by bribing civil servants and infiltrating key positions, was a contributing factor (Ministerie van Justitie and Ministerie van Binnenlandse Zaken 1992). At the same time, breaches of integrity in a number of municipalities in a southern province came to light and were reported in detail by journalists. This led the minister of the interior, Ien Dales, to place integrity firmly on the agenda in 1992. The National Security Service, which is part of the Interior Ministry, also played an important role. According to Bovens (1996), involvement of the ministry and the security service was motivated by “bureau politics.” Both were facing a crisis of legitimacy; the ministry had lost many responsibilities as a result of decentralization and the rise of other departments, and with the end of the cold war, the security service was in search of a new mission to justify its continued existence. Safeguarding the integrity of the government suited both organizations in their role as guardians of the democratic system.

### *Policy Stream*

Conferences with key figures from the public sector were quickly organized, and a diverse range of papers explored the situation (Ministerie van Binnenlandse Zaken 1993). The first policy document focused on producing an inventory of integrity risks, preventing and dealing with violations, and measures to promote integrity from the perspectives of both the organization and personnel management (Ministerie van Binnenlandse Zaken 1995). This represented the first initiative toward a less voluntary, more formalized policy. The National Security Service began to develop a system to detect vulnerabilities in the procedures of government agencies and established a report desk for alleged breaches of integrity.

### *Analysis*

In retrospect, the launch of the issue of integrity was prompted by a stream convergence of problems, political momentum, and new policy proposals. There was a fear that structural machinations by the criminal underworld would endanger the core of the government and the democratic state. Concurrently, the scandals in the southern province—which seemed almost endemic and were covered extensively in the media—provided a fertile breeding ground. Interior Minister Dales acted as a true policy entrepreneur by placing integrity high on the agenda. The desire for a meaningful role for both her ministry and the National Security Service was a contributing factor. In this regard, as Kingdon points out, referring to March and Olsen (1984), government agencies are not merely policy followers but are autonomous actors whose vision and interests can influence the policy agenda. The initial integrity proposals and measures began to mature within the organized policy communities, thereby opening a window of opportunity. As a result, the topic of integrity was now formalized and permanently on the map. In academia, however, there was no interest in public integrity as a research subject at this point in time (Huberts 1992).

## **2.5.2 Phase 2: Gradual regulation (1995–2003)**

### *Problem and Politics Streams*

The serious concern about integrity that began in the preceding period continued. The first inquiry into integrity policy by the Court of Audit was critical of the progress made and stated that the introduction of integrity policy was proceeding with difficulty (Algemene Rekenkamer 1996, 1998). Academic and media publications on the theme of integrity increased in this period, partly stimulated by incidents in large municipalities (Soetenhorst and Zonneveld 2001; Verlaan 1999), while the exposure later in the period of widespread corruption in the construction industry also had a major impact (Karssing 2006). Prime Minister Jan Pieter Balkenende and his cabinet considered the national debate about norms and values in 2002 to have raised an important political issue in which both the government and the public sector had to play an exemplary role, and in consequence the issue of integrity flourished during his administration (2002–2006).

### *Policy Stream*

Integrity policy was given further shape and content in this period. The document “Integrity in Public Administration” issued by the Ministry of the Interior (1999) pledged a more uniform integrity policy, new regulations, and supervision of policy measures. Two sets of amendments were made to the Civil Servants Act (in 1997 and 2003), and the central government developed a range of rule-oriented integrity guidelines, models, and audits. The emphasis was on top-down imposition of uniform rules and prescriptions to prevent unethical conduct and to promote ethical conduct through external supervision, control, and punishment of perpetrators. On a decentralized level, however, small-scale initiatives with a more values-oriented character started to develop. This strategy was characterized by joint bottom-up formulation and internalization of the desired organizational values and the promotion of ethical conduct by strengthening the moral competence of employees. It focused on equipping individuals with the capacity to use their own judgment (internal guidance) in arriving at morally accountable and ethical courses of action. The Inland Revenue Services (van Blijswijk, Breukelen, Franklin, Raadschelders, and Slump 2004) and the municipality of Amsterdam were front-runners in this trend.

### *Analysis*

The theme of integrity remained on the agenda, steadily developing in accordance with the previously instituted policy. The problems that continued to arise and the critical policy evaluations of the Court of Audit contributed to this, as did the fraudulent practices in the construction industry that came to light at the end of the period. In addition, the lively public discussion of norms and values made for a more critical attitude among citizens toward government. From a policy perspective, little changed, with the result that this period could be described as one of gradual, incremental policy development. It was a time of what Baumgartner and Jones (1993) refer to as “punctuated equilibria,” a long period of relative stability occasionally interrupted by significant changes. The absence of new policy proposals can be attributed to the fact that such alternatives had not yet sufficiently developed or taken shape within the policy community. As such, this period was characterized by a partial connection between the political and problem streams, independent of the policy stream (Figure 1). Thus the change should be labeled as gradual rather than abrupt.

### **2.5.3 Phase 3: Discontinuous value-oriented expansion (2003–2007)**

#### *Problem and Politics Streams*

In this phase, the theme of integrity became a more prominent agenda item. The shift is illustrated by the explicit mention of integrity in the Outline Agreement constituting the second Balkenende cabinet (Hoofdlijnenakkoord voor het Kabinet CDA 2003: 7) as well as by the 2004 debate in the House of Representatives on integrity in public administration. The first policy evaluations appeared shortly thereafter (Algemene Rekenkamer, 2005; Huberts & Nelen, 2005; Ministerie van Binnenlandse Zaken, 2004). The evaluations

concluded that a strong impetus was still required to improve integrity policy and the integrity system, and that breaches were not unequivocally and centrally registered. In addition, prominent leaders criticized the lack of progress during the first two phases (Karssing, 2006), maintaining that integrity policy was discussed a lot but only reluctantly implemented. Large-scale research on how public servants perceived integrity painted a bleak picture of the regard for integrity in government agencies and the transparency/openness of the organizational culture (Ministerie van Binnenlandse Zaken, 2007). The outcome of these evaluations, and the investigations of fraud and corruption in the construction industry, contributed to the problematization of the issue and the pressing need for change.

### *Policy Stream*

The evidence of a strengthening of integrity policy in this period is reflected in the document "Integrity Policy Public Administration and the Police" (Ministerie van Binnenlandse Zaken, 2003). On the one hand, central steering was continued with the announcement of detailed regulations and policy inventories. On the other hand, the document established an explicit connection between integrity and greater concern with norms and values (Karssing, 2006). For the first time, and partly because of the investigations of construction fraud, explicit attention was given to consciousness raising and to the cultural aspects of integrity policy. As a result, the prevailing rule orientation was broadened to include a more values-oriented approach. At the same time, the responsibilities of the Ministry of the Interior were expanded. Now, in addition to its legislative function, it assumed a facilitating role through the establishment of the National Office for Promoting Ethics and Integrity in the Public Sector. The establishment of this office coincided with a third amendment to the Public Servants Act in 2006 that legally embedded the values-oriented approach (in addition to a number of more rule-oriented stipulations) (Ambtenarenwet, 2006).

### *Analysis*

Policy change in this period was non-incremental and abrupt. The diverse problems that arose, as well as the prime minister's once again placing the issue on the agenda, coincided with new policy proposals and goals on the basis of what Kingdon refers to as the "gradual accumulation of knowledge" within the policy community (2010: 17). Collaboration with scientific institutions and the Interior Ministry's greater capacity to deal with integrity matters gave concrete substance to a broader approach to integrity. However, the General Intelligence and Security Service (formerly the National Security Service), which had played an important role in the first and second phases, now had to withdraw its involvement. The attacks of September 11, 2001, and two political murders in the Netherlands (in 2002 and 2004) obliged it to change its focus to combating terrorism and providing personal security for public officials.

### **2.5.4 Phase 4: Reorientation and reprioritization (2007–2010)**

#### *Problem and Politics Streams*

In this period, the composition of the government changed twice, and thus there were two different ministers of the interior. The primary objective of the new minister was to thoroughly understand the nature and scope of the integrity problem and the reporting structure, led by the lack of insight into the nature and scope of breaches of integrity as indicated in earlier reports (Algemene Rekenkamer, 2005; Groupe d'Etats contre la Corruption, 2003; Huberts & Nelen, 2005). The focus on the reporting structure was prompted by a critical report about the existing whistleblowing guidelines (Utrechtse School voor Beleidsonderzoek, 2008) as well as reports in the media about the negative consequences for several prominent whistleblowers. Investigations carried out during this period found, on the one hand, that attention to integrity and implementation of integrity measures had improved, but, on the other hand, that familiarity with integrity measures was still problematic, and there was little confidence in the integrity of government organizations and the ethical guidance provided by their managers (Algemene Rekenkamer, 2010; Ministerie van Binnenlandse Zaken, 2008a and 2008b).

A number of studies at the end of the period demonstrated that integrity policy was still not thoroughly institutionalized (Algemene Rekenkamer, 2010; Hoekstra & Kaptein, 2012; Jongmans, 2011; Van den Heuvel et al. 2010). Policy within government organizations was incoherent and fragmentary, not based on a clear vision, and seldom evaluated and reported. For the first time in 20 years, integrity now became a broader question of organizational design. Concurrently interest in political integrity increased (Ministerie van Binnenlandse Zaken, 2009). This was caused, at least in part, by breaches of integrity by officials brought to light by the media and by widespread discontent regarding the income, side-line activities, and expense claims of elected officeholders such as ministers and aldermen. The elections at the end of the period were marked by a difficult and drawn-out struggle to form a cabinet followed by considerable budget cuts as a result of the 2008 financial crisis.

#### *Policy Stream*

A uniform national registration system for integrity violations was developed, the whistleblowing regulation was amended, and the dismantled report desk of the National Security Service was replaced by the new option of reporting integrity violations to the Report Crime Anonymously Foundation (Becker et al. 2010).

Table 1: Reconstruction and Analysis of Dutch Integrity Policy 1990-2010

Phases	Streams		Characterization	Type of policy change
	Problems	Political-administrative		
<b>Phase I:</b> 1990-1995	<ul style="list-style-type: none"> <li>- organized crime</li> <li>- integrity breaches in southern province</li> <li>- institutional problems: Ministry of the Interior/National Security Service</li> </ul>	<ul style="list-style-type: none"> <li>- problem acknowledgement</li> <li>- legitimization Ministry of the Interior/National Security Service</li> </ul>	<ul style="list-style-type: none"> <li>- conferences</li> <li>- policy exploration</li> <li>- policy documents</li> </ul>	<p>Initial formalization: orientation phase with slightly rule-oriented focus.</p> <p>Abrupt: more formalized approach and more prominent positioning of the issue of integrity than in previous years.</p>
<b>Phase II:</b> 1995-2003	<ul style="list-style-type: none"> <li>- integrity issues in some large cities</li> <li>- revelation of fraud in construction industry</li> <li>- critical policy reviews</li> </ul>	<ul style="list-style-type: none"> <li>- debate norms and values Cabinet Balkenende I</li> </ul>	<ul style="list-style-type: none"> <li>- policy documents</li> <li>- change Civil Servants Act</li> <li>- development of various integrity manuals</li> </ul>	<p>Gradual: the issue remains on the agenda and builds upon the approach of the preceding period but does not change significantly due to lack of new policy ideas.</p> <p>Gradual regulation: intensification of rule-oriented policy.</p>
<b>Phase III:</b> 2003-2007	<ul style="list-style-type: none"> <li>- impact fraud in construction industry</li> <li>- criticism from/of prominent public leaders</li> <li>- critical policy reviews</li> <li>- two political murders</li> </ul>	<ul style="list-style-type: none"> <li>- outline agreement and debate on public morals Cabinet Balkenende II</li> <li>- support as result of construction fraud</li> <li>- receding role of National Security Service</li> </ul>	<ul style="list-style-type: none"> <li>- policy documents</li> <li>- change Civil Servants Act</li> <li>- expansion of policy capacity: Ministry of the Interior</li> <li>- Establishment National Integrity Office</li> </ul>	<p>Discontinuous broadening: acknowledgement of the importance of integrity awareness and a facilitating role for the Ministry of the Interior.</p> <p>Abrupt: the issue gains a more dominant position on the agenda and expands to a more value-oriented policy through the introduction of new policy ideas.</p>
<b>Phase IV:</b> 2007-2010	<ul style="list-style-type: none"> <li>- lacking insight into integrity breaches</li> <li>- whistle-blowing problem</li> <li>- critical policy reviews</li> <li>- lacking institutional assurance</li> <li>- integrity incidents of elected public office holders</li> </ul>	<ul style="list-style-type: none"> <li>- support for whistle-blowers and political integrity</li> <li>- cuts in public spending</li> <li>- rise of other important issues</li> </ul>	<ul style="list-style-type: none"> <li>- laborious new policy initiatives</li> <li>- shrinking capacity and less attention for integrity due to other emerging administrative issues and cutbacks</li> </ul>	<p>Gradual: the issue remains on the agenda and there is evidence of a shift in emphasis, but through the change of government and policy reorientation it is hard to predict whether and how these policy ideas will take shape.</p> <p>Reorientation and reprioritization: focus on report structures and political integrity, new administrative priorities and, attempts to delegate responsibility for integrity on a more decentral level.</p>



### *Analysis*

Integrity remained on the agenda in this period, supported by a number of critical evaluations and incidents. Although there is evidence of new initiatives, it is too early to speak of a decisive change, given that the initiatives were not fully developed and supported. The national uniform registration system for violations, for example, was only partly successful, given that not all sectors participated. Although the whistleblowing regulation was amended, the idea of setting up an accompanying advisory body is still under discussion. It also remains to be seen whether the theme of political integrity will truly become more important. Whether and how these issues will be addressed in the future, and whether there will be any fundamental changes, partly depends on the outcome of the reorientation of the Ministry of the Interior and the planned decentralization of the responsibility for integrity policy. In this respect, the impact of the financial crisis is also important, as are the ministry's new administrative priorities, such as "Safe Public Duty" and "Revision of the Special Legal Status of Civil Status."

An overview of the described policy developments is presented in Table 1.

## **2.6 Summary and Implications**

Huberts (2001) stated that the development of Dutch integrity policy was an incremental process. The present study, however, shows that in addition to incremental change, policy change also occurred abruptly. The acquisition of a permanent position on the political agenda driven by ethical problems, and the accompanying development of policy and measures in the beginning of the 1990s, led to a stream convergence forged by a strong policy entrepreneur (the interior minister). This resulted in an abrupt departure from the incidental and voluntary concern for integrity in the preceding period.

Ten years later, a broadening of policy from a rule-oriented to a more value-oriented approach was detected, and this resulted in a second abrupt change. The problem, politics, and policy streams converged again, this time under the supervision of the prime minister. This change is, however, in contrast with an OECD study (1997) that scored the Netherlands as already very high on the values approach in the second half of the 1990s. As the present analysis demonstrates, this approach did not become a reality before the third phase of Dutch policy development.

In the second and fourth phases there was policy change, but of a different nature: small, incremental, less distinctive, gradual changes. Stream convergence did not take place in these periods because policy proposals had not yet matured or been supported, and because of the absence of strong entrepreneurs. Based on Kingdon's model, both gradual and abrupt changes could be distinguished, which can be explained by (non) occurring convergences in the three streams. As the next section demonstrates, four conditions were found to be of influence in such convergences.

### **2.6.1 Practical implications**

The present study shows that fundamental changes occur when problems, political support, and matured policy ideas converge. Four (pre)conditions were found to be important for stream convergence, and this should be taken in account if there is a future desire to influence policy change. The first two conditions address the problem stream, the third refers to the politics stream, and the fourth relates to the policy stream.

First, there is potential for fundamental change when breaches of integrity are taken seriously by policy- and decision-makers who address system failures from a broader organizational perspective rather than as isolated incidents. Second, policy inventories, reviews, and inquiries appear to be an important factor in the development of integrity policy. The existence of monitoring instruments by means of which policy can be critically assessed is important for effective, problem-driven policy development. Monitoring will also guarantee attention to the issue of integrity in a political-administrative sense if reports are presented in parliament. Third, the personal affinity and commitment of influential authority figures, such as ministers and the prime minister, is key to the realization of substantial progress in integrity policy development. Through debate, they can raise governmental and societal awareness of the importance of integrity and effective policy. Fourth, policy alternatives need to be ready—formulated, supported, and tested—in order to be launched effectively in the specific time slot of a policy window. This underlines that problems and political will are not by themselves enough to enforce policy change. The lack of new and ready ideas explains the gradual course of the second phase (1995–2003).

Although this study makes clear that none of these conditions is, on its own, able to affect a convergence, combined they are useful levers for influencing the policy process if fundamental changes are desired. Whereas the uncertainties involved in change processes have a moderating effect on the goal of developing integrity policy, the regularities (in the form of the four conditions discussed above) offer opportunities for the continued pursuit of substantial policy development.

If the worldwide trend continues within and outside government to invest in the improvement of integrity and integrity policy of public officials and organizations so as to recover trust in these institutions, these conditions for change should be taken into account. This certainly applies to countries in the beginning phases of formulating integrity policy and intent on making considerable progress in the coming years.

### **2.6.2 Theoretical Implications**

Kingdon provides a model that is generally applicable for studying policy change. His model explains the conditions under which policy ideas can reach the agenda and identifies the actors that can influence the process. Notable in his account, however, is the negligible influence of the media and civil servants. Kingdon regards media influence as both too short-lived and too sensationalist to have influence on politics and the policy

stream. This is why, in his view, the policy community regards the press with a certain degree of disdain. However, the extensive and prolonged attention of Dutch investigative journalists to integrity almost qualifies them as policy entrepreneurs (Dohmen, 1996; Dohmen & Verlaan, 2003; Verlaan, 1999). Their analyses were sometimes so elaborate that concrete proposals could be derived from them, not only providing inspiration to policy advisers, but enabling them to justify their policy proposals and imparting a sense of urgency and commitment to decision-makers in the political arena. That journalists are even invited by the policy community to share their insights attests that their influence has been underestimated.

Kingdon limits the influence of the civil service to the formulation and implementation of proposals. Public officials, however, sometimes actively attempt to influence the agenda. Some may see this as an example of the aforementioned fear about a “fourth power.” It is often the case when a new government takes office and asks permanent officials for their input on its programs, especially if the officials try to persuade the new ministers to prioritize certain policy issues both internally and externally. The receptiveness of the minister, however, is an important precondition for an official’s being able to influence the agenda. Publications by government functionaries in journals are also an attempt to influence the political agenda by drawing the attention of decision-makers and members of parliament to a specific issue.

One may ask to what extent these observations are specific to the Dutch context and to the policy area of integrity. More detailed research on an international level could shed light on this and might lead to further theoretical development of Kingdon’s model. Regarding integrity policy in general, two final questions are relevant for further study. First, it would be interesting to find out whether the alternation between abrupt and gradual changes in the development of integrity policy is found in countries throughout the world or only typical of the Netherlands. Second, is the sequence of alternating emphasis on compliance- and values-based integrity programs (Becker et al. 2010) a universal trend? Gaining insight into these aspects of the course of integrity policy would increase the predictability of future developments.

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The background features a dark blue field filled with various sizes of semi-transparent gears. Overlaid on this are several bright yellow geometric shapes, including triangles and a large diagonal band, creating a dynamic, industrial aesthetic.

# PART 2.

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HOW ORGANIZATIONS INSTITUTIONALIZE  
AND MANAGE INTEGRITY IN PRACTICE



The background features a large, faint, light gray number '3' on the right side. On the left side, there are several overlapping, semi-transparent gear shapes in various shades of gray, creating a mechanical or industrial aesthetic.

# **CHAPTER 3.**

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## **THE INSTITUTIONALIZATION OF INTEGRITY IN LOCAL GOVERNMENT**

## Abstract

Scientific research and legal provisions offer more guidance on what regulations and instruments government organizations should apply to manage integrity than on how they should manage integrity, although the latter is at least as important as the former. Based on interviews with integrity officials in Dutch local government organizations, this exploratory study develops a descriptive typology of different approaches to the institutionalization of integrity. Its main contribution is a typology demonstrating that a “one-size-fits-all” approach does not exist. Combined with the critical elements and conditions for institutionalizing integrity, this typology can guide local authorities in making considered decisions in managing organizational integrity.<sup>2</sup>

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<sup>2</sup> This chapter is previously published as: Hoekstra, A. & Kaptein, M. (2013). The institutionalization of integrity in local government. *Public Integrity*, 15(1), pp. 5-27.

### 3.1 Introduction

In recent decades, issues pertaining to ethics and integrity have become a matter of growing concern in both the public and the private sector (Berman, West, & Cava, 1994; Bowman, 1990; West & Berman, 2004). This can be attributed to various factors, such as political pressures to outdo the previous administration in terms of ethical “toughness” (MacKenzie & Hafken, 2002) and the prevailing societal climate that enables politicians to score as ethical “hardliners” (Hoekstra, Belling, & Van der Heide, 2008). In addition, notable incidents of fraud and corruption have contributed to a sense of urgency about the importance of ethics in organizations (Fombrun & Foss, 2004; Jose & Thibodeaux, 1999; Smith, 2003).

In the private sector, reputation damage and the loss of shareholder and customer confidence, in some spectacular cases even bankruptcy, have had a far-reaching impact (Treviño & Nelson, 2004). In the public sector—the focus of this article— instances of corruption and unethical conduct of officials have been reported world-wide (Menzel, 2009). According to Bossaert and Demmke (2005), this can lead to a loss of trust in public authorities and administration, discontent about the waste of taxpayers’ money, disillusionment with the political system, a decline in citizen’s willingness to comply with government rules and regulations, and, ultimately, a diminishment in the effectiveness of the public sector.

The public’s insistence that civil servants and public officeholders adhere to ethical standards, the scrutinizing role of the media, and “corruption watchdogs” such as Transparency International all support the concern about ethical conduct in the public sphere (Huberts, Maesschalck, & Jurkiewicz, 2008). External pressures of this kind have contributed to the proliferation of integrity legislation, which has led individual government organizations to subscribe to and invest in a wide range of initiatives and instruments aimed at fostering integrity (Gibson, 2009; Menzel, 2007; Smith, 2003). Pre-employment screening, ethics oaths, codes of conduct, integrity training, ethics officers, integrity risk assessment methodologies, audits and reporting, and investigation procedures are among the many instruments that have been developed and adopted to this end.

Nowadays there does not seem to be a shortage of knowledge and expertise on the content of integrity policy and the measures and instruments an organization could adopt. However, the organizational aspects of integrity, or more specifically the manner in which integrity is and should be institutionalized within organizations, have been neglected somewhat.

Compared to research on ethics and integrity in the private sphere, the field is generally less developed in public administration (Menzel, 2005). And with the exception of the work of some public administration scholars in Anglo-American countries (Berman et al. 1994; Gibson, 2009; Herrmann, 1997; Lawton & Macaulay, 2004; Menzel, 2006 and 2007; Smith, 2003), the specific focus on institutionalizing seems to be developed even less. The interest in institutionalization issues in these nations can be attributed to their

enactment of specific legal provisions to institutionalize integrity that have not been enacted in many other countries. And despite the attention the institutionalization of integrity receives in business ethics (Ethics Resource Center, 2007; Kaptein, 2010; Pajo & McGhee, 2003; Rossouw & Van Vuuren, 2004), experts still view it as a relatively under-researched area (Jose & Thibodeaux, 1999) that requires further investigation (De Colle & Werhane, 2008) and deserves high priority (Singhapakdi & Vitell, 2007). Publications by nongovernmental organizations, for instance the Organisation for Economic Co-operation and Development (OECD, 2008b), address the theme of the institutionalization of integrity, but the focus is generally on the national or even international, rather than the organizational level. The same applies to research and publication on local integrity systems, which also focus mainly on the broader organizational context and external institutions, such as the media, ombudsmen, civil society, and the judicial system (Huberts, Maesschalck, & Jurkiewicz, 2008). Limited attention has thus far been paid to the internal institutionalization of integrity in public sector organizations.

This “how to” dimension is, however, of paramount importance. The institutionalization of integrity can be regarded as a ‘*conditio sine qua non*’ for government organizations. The institutionalization of integrity is defined as the process of transferring integrity ambitions into intended outcomes by means of support structures, specialized agencies and officers, and formalization processes within a given context. This entails that the specific content of integrity policy and the available measures and instruments are taken as given input and that a more functional approach is adopted. In this respect a narrower approach is followed than is often pursued in “integrity management,” which encompasses both the substantive content of specific integrity measures and policies (the “what”), the methods to embed integrity (the “how”), and also the monitoring and evaluative aspects of the “integrity policy cycle” (Kaptein, 1998). The explorative research presented in this article serves a primarily descriptive and, to some extent, prescriptive purpose. It offers insight into integrity institutionalization approaches within government organizations and an understanding of the critical elements and conditions for institutionalizing integrity.

### 3.2 Institutionalizing Integrity

Integrity and the institutionalization of integrity can be studied at a micro (personal), macro (national), or meso (intra-organizational) level (De Ruyter, Bullens, Van der Beken, & Siron, 1999). At the micro level, the focal point is the ethical behavior of individual employees and their ability to act as “good” employees. This entails, for instance, the ability to solve ethical dilemmas, avoid integrity risks, and resist temptations. The different roles an individual fulfills and the competence to deal with sometimes complex and conflicting expectations in a morally responsible manner constitute an important issue (Cox, 2003).

At the macro level, integrity involves the development of integrity systems at a national or even an international level. The focus is on the roles, tasks, and powers of specific institutions involved in combating corruption. International NGOs, such as Transparency International, the Council of Europe, the United Nations, the World Bank,

the International Monetary Fund, and the OECD, function primarily at this macro level (Huberts, Anechiarico, & Six, 2008). They design systems of nationwide institutional arrangements and frameworks to foster and support integrity. In this article, integrity at the intraorganizational (meso) level takes center stage. From this point of view, the focus is on the structures and formalization processes designed to support integrity initiatives and the key role players involved.

### ***3.2.1 Two views on managing integrity***

The literature shows that scholars have different views on the extent to which organizations are capable of managing employee behavior and therefore on the logic of designing policies and systems in order to do so (Kaptein, 1998; Menzel, 2007; Paine, 1994; Treviño & Nelson, 2004). One point of view is that individuals are taught ethical values and behavior during early childhood and youth. As such, ethical consciousness is a matter of disposition, an individual character trait, which is fixed and almost indifferent to attempts to influence or change it later in life. Therefore, organizations cannot be expected to be responsible for the character of their employees. In keeping with this line of reasoning, Bowman (1990), for example, demonstrates that quite a number of organizations neglect or deny their responsibility for ethics and integrity, and make it a concern primarily of individual employees. From this view, integrity is often antonymously and negatively defined as not being corrupt or fraudulent, and misconduct is perceived as aberrations by “bad apples” which should be detected and removed from the organization as swiftly as possible.

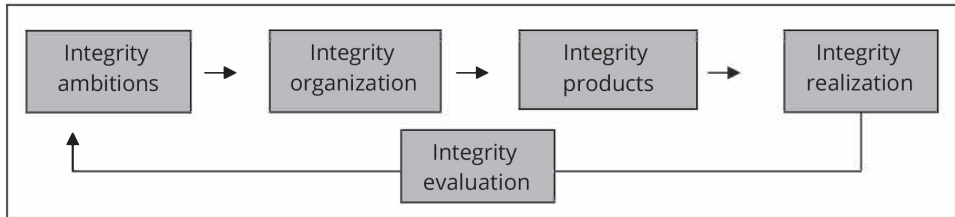
Quite the opposite view holds that ethical behavior can be taught, and that organizations can design structures, processes, and strategies to encourage and support ethical behavior. Here the focus shifts from the disposition of individual employees and occasional ‘bad apples’ to a sound organizational ‘barrel’ supported by a healthy structure and culture and coherent integrity-management systems. Nowadays a general consensus prevails among scholars that integrity is a responsibility of the organization and management. Treviño and Nelson (2004:10), for instance, state: “Discarding bad apples generally won’t solve an organization’s problem with unethical behavior. The organization must scrutinize itself to determine if there’s something rotten inside the organization that’s spoiling the apples”. The authors subscribe to this view, and in the sections that follow analyze the manner in which organizations institutionalize integrity.

### ***3.2.2 Framework for analyzing integrity***

A model based on systems theory, an interdisciplinary field of science that pertains to complex systems, is employed to answer the research questions. Systems theory was developed in the 1940s by the biologist Von Bertalanffy (1968). Instead of reducing an entity to the properties of its parts, the theory focuses on the arrangement and interrelations of the parts that connect them into a whole. More specifically, it is a framework by means of which one can analyze a group of objects that work in concert to produce a certain result. Important interrelated, basic components of such a framework are input, throughput, output, outcome, and evaluation. In short, the theory assumes

that a system's input will lead, via a certain organizational arrangement (throughput) and the accomplished output, to certain results (outcome). A systems theory framework can be employed to analyze integrity policy. It provides a fresh perspective on the various aspects of an integrity policy cycle. For research purposes, the basic components of systems theory were translated into terminology that matches the stages of such a cycle, as depicted in Figure 1.

**Figure 1:** Systems Approach to Integrity Policy



*Figure 1: a systems approach of the integrity policy cycle*

It all starts with the ambitions of an organization in managing integrity. These ambitions are often based on specific legislation and norms for a specific sector or industry, and are supported by ethical guidelines and other instruments. This can be considered as the input, the working material, of the system. In the next stage, integrity ambitions need to be institutionalized in the organization, while the individual instruments need to be orchestrated. The organization, or institutionalization, of integrity entails the design and formalization of integrity structures and processes, including the establishment of a coordinating integrity office or the appointment of integrity officers. This can be seen as the throughput of the system, which transfers the input into integrity output. Integrity output can be expressed in terms of products and services that are delivered within the organization, for instance, integrity workshops and risk assessments. In the end, it all comes down to the effects (impact) of these initiatives, and the extent to which the intended integrity ambitions are realized and effective. This can be seen as the outcome of the system, which manifests in more trustworthy, legitimate, and responsible public organizations. Periodic monitoring and evaluation of the integrity policy reveals whether appropriate measures were taken, whether they are effective, and how they can be modified and improved.

### ***3.2.3 Formal and informal institutionalization strategies***

In the ethics literature, the organizational component, throughput, is generally referred to as institutionalization. The process of institutionalization is based on institutional theory, which “attends to the deeper and more resilient aspect of social structure. It considers the process by which structures, including schemas, rules, norms, and routines, become established as authoritative guidelines for social behavior” (Scott 1995: 408). Institutionalizing integrity implies “getting ethics formally and explicitly into daily



business life" (Purcell & Weber, 1979: 6) and can be seen as analogous to creating the "good barrel" (Singhapakdi & Vitell, 2007).

Institutionalization has the aim of ensuring that the integrity ambitions, norms, and measures (input) are supported by organizational structures and formalization processes. Important structural aspects include the design of clear, resilient structures and integrity systems and the delineation of the specific roles and tasks of key officials and responsible departments. Key aspects of the formalization process include the visible design, documentation, and standardization of a well-developed, proactive plan that grounds, promotes, and supports ethical behavior (Foote & Ruona, 2008; Tenbrunsel, Smith-Crowe, & Umphress, 2003).

Although formalization can be considered an important aspect of institutionalization, Brenner (1992) also distinguishes a more informal institutionalization strategy. This strategy is characterized by a more implicit, indirect, and "low-profile" approach, which is less visible and recognizable to people inside and outside the organization. Although the strategy has a significant influence on the ethical climate of the organization, it is not directly aimed at fostering integrity; instead it focuses "on a wider set of goals than just the rightness or wrongness of employee behavior" (Brenner, 1992: 393). The strategy focuses on the question of what it means to be a "good employee" and a "good employer." This strategy is behaviorally based (Berman et al. 1994) and resembles the integrity-based approach, as described in Paine's (1994) classic article. Cardinal aspects include: exemplary conduct of colleagues and management; general value statements and credos; fair practice in job appraisals, promotions, and payments; rewarding "good" behavior; and encouraging professional pride and responsibility. Research has shown that small organizations are more likely to rely on these informal forms of institutionalization. Such organizations generally have fewer resources and spend less attention directly on enhancing integrity; they less often appoint specialized integrity officers or establish an integrity office, they do not design formal structures and integrity plans, and they tend to use "softer" control systems (Guillén, Melé, & Murphy, 2002; Longenecker, McKinney, & Moore, 1989; Menzel, 2006; Robertson, 1991; Soutar, McNeil, & Molster 1995; Weaver, Treviño, & Cochran, 1999).

### **3.2.4 Formal vs. informal institutionalization: The debate**

There is an ongoing debate on the pros and cons of both strategies that can be traced back to the famous Friedrich-Finer debate of the 1940s. Whereas Friedrich stressed the importance of more implicit forms of internal self-control, Finer placed his faith in more explicit, external institutional controls (Cooper, 2006).

Proponents of the informal approach argue, for instance, that a formally institutionalized approach often fulfills a purely symbolic function. It demonstrates, often in a misleading way, that the organization takes ethics to heart and complies with integrity legislation. Consequently it has been dubbed "Enron ethics," illustrating "the ultimate contradiction

between words and deeds, between a deceiving glossy facade and a rotten structure behind. . . . Enron ethics means that business ethics is a question of organizational 'deep' culture rather than of cultural artifacts like ethics codes, ethics officers and the like" (Sims & Brinkmann 2003: 243).

Others argue that organizations have limited time and resources to develop and implement formal ethics programs and structures (Weaver et al. 1999) and therefore emphasize the more informal, culturally oriented, strategy with a central role for managers encouraging ethical conduct (Murphy, 1988; Petry & Tietz, 1992; Vitell & Singhapakdi, 2008). Managers themselves also seem to be skeptical about the possibility of formally institutionalizing ethics and display a preference for an informal strategy based on encouraging ethical behavior through the deeper organizational culture and leadership (Jose & Thibodeaux, 1999).

Although ethical leadership is important, it may be inconsistent among managers, and because ethics is seldom a factor in hiring and ethics training is often not mandatory (Berman et al. 1994), relying only on informal institutionalization approaches—which strongly depend on the capabilities of individual managers—is risky. The design of formal structures and processes and the appointment of specialized officials can therefore support managers and enable them to give substance to their responsibility to foster integrity. The Ethics Resource Center (ERC, 2005), for instance, emphasizes the importance and the positive effects of an informal, culture-based strategy but also argues that strong ethical cultures are supported by a formal ethics approach:

. . . where cultures are strong, it is in part because a formal program is in place. Even further, formal programs are likely to be an essential element in the maintenance of a strong culture. While culture matters in making an impact, formal programs are still essential to creating a culture. (V: 94)

Pajo and McGhee (2003: 62) support this line of reasoning: . . . informal processes play a vital role in the establishment and maintenance of an ethical climate, and . . . the actions of peers and superiors are particularly critical in this regard . . . [but] . . . relying solely on informal mechanisms has inherent dangers. Without formal systems to safeguard ethical behavior and clear standards against which employees can benchmark their actions, the same informal mechanisms that can contribute to a positive ethical climate may instead foster laxity and unethical decision making.

The OECD (2008a) also emphasizes the importance of formalized, structured, visible, and explicit institutionalization of organizational integrity, arguing that it increases the scope for coordination and allows for synergies between instruments, allows for an accumulation of expertise based on recommendations, insights, and best practices, ensures continuity of ethics in the long term, and clearly signals that integrity is considered important within the organization.

To summarize, “The quest for entrenching ethics in an organization . . . will require not only an informal commitment to ethical behavior, but also a formal and sustained institutionalization” (Rossouw & Van Vuuren 2004: emphasis added). A preliminary conclusion is that both approaches have their advantages, but that a combination of the two is probably most effective (ERC, 2008), and that the right combination probably depends on the specific organizational context and characteristics.

### 3.3 Methods

The qualitative methods followed in this study can be situated in the tradition of “grounded theory” developed by Glaser and Strauss (1967). This theory posits that truth, or reality, emerges from an ongoing interpretive process where meaning is produced by observers. It is therefore suitable to making knowledge claims about the way individuals perceive or interpret reality, as opposed to making truth claims about an “objective reality,” as the positivistic natural sciences do (Suddaby, 2006). Grounded theory follows an inductive approach based on the experiences of studied actors and systematically analyzes data in accordance with conceptual categories or typologies that are constructed based on such data.

The research for this article was conducted among local government organizations that, thanks to their relative autonomy, were identified as having distinctive approaches to the institutionalization of integrity. Since the goal was to gain an initial understanding of the way in which integrity is institutionalized, a limited number of in-depth interviews were conducted with officials directly involved in, and responsible for, embedding integrity in their organizations. The results of the fifteen interviews achieve what Glaser and Strauss (1967) refer to as the “saturation point.” The law of diminishing returns (Kvale, 1996) made clear that beyond this point, any new interviews would add increasingly less to what had already been learned (Rubin & Rubin, 2005). The limited number of interviews implies that the research findings are not representative of the whole spectrum of local government organizations. Since the perceptions and experiences of respondents were interpreted, no objective truth claims are being made. Instead these experiences were abstracted into meaningful categories and typologies at a conceptual level.

In order to reach a rich understanding of the various institutionalization approaches, the selection included large, medium-sized, and small organizations. Three of the organizations studied belonged to the first category, and the rest were distributed equally along the other two categories. To allow for possible regional differences, the selected organizations were spread throughout the country. Within these parameters, different methods for selection of organizations were combined. At the end of each interview, the respondents were asked if they knew of organizations that followed an approach different from theirs in institutionalizing integrity. This method, known as network or “snowball” sampling (Babbie, 1989), was applied in order to get an overview of as diverse a range of approaches as possible. However, the network method had to be combined with a more or less random selection method (within the parameters defined), since it

became clear during the research that these organizations hardly have (or exchange) information about each other's integrity approaches.

To enhance willingness to participate and avoid the risk of social desirability bias, the confidentiality of the interviews was guaranteed. To maximize openness, it was emphasized that the goal was to achieve a better understanding of institutionalization approaches and of the conditions that contribute to or impede embedding integrity in an organization. Most of the organizations approached reacted positively and agreed to participate. Six small organizations declined the invitation due to lack of time. It is reasonable to ask whether the organizations that agreed to participate did so because they were already to some extent active in institutionalizing integrity, because if that were the case, it would have resulted in a biased view. This concern is unnecessary, since several organizations admitted that they did not institutionalize integrity and reported their shortcomings in this respect.

The interviews were conducted on site between February and July 2009. A "standardized" interview guide for research questions was designed, which ensured consistent application of the primary research questions. Based on the transcripts, a code-tree was gradually constructed, the transcripts were (re)coded with two researchers, and simultaneously ways to categorize and present the research findings were conceived. The interrater reliability was 0.75, which is considered an acceptable score (Lombard, Snyder-Duch, & Bracken, 2002). The coded transcripts were analyzed in successive steps in order to condense the information into clear and tractable conceptual structures and typologies. In addition to the interviews, the integrity policy plans of the organizations were obtained (if available), and their content was analyzed. This use of multiple sources (interviews and documents) is also considered an important aspect of grounded theory.

## 3.4 Findings

### 3.4.1 *Integrity policy in the Netherlands*

Public integrity has been on the Dutch political and administrative agenda for almost twenty years (Hoekstra et al. 2008; Menzel, 2007). The Netherlands is a decentralized unitary state. As such, governmental bodies—within the bounds set by centrally issued formal legislation and collectively formulated and agreed-upon integrity norms—possess a large degree of autonomy. This means that individual governmental organizations are responsible for the appropriate formulation, design, implementation, and enforcement of integrity policy within the framework established by the central government. The minister of the interior and kingdom relations fulfills a coordinating role, which entails steering, monitoring, and promoting the general public sector integrity policy. Steering takes place on the basis of the inclusion of integrity-related provisions in the Civil Servants Act that are mandatory for all public organizations. In addition, the minister monitors compliance with the regulations via periodic inventories and also promotes attention to integrity through policy statements, for example, and by organizing conferences and roundtables. The National Integrity Office, established in 2006, assists the minister in

the latter role by developing and providing practical and ready-to-use instruments and models to enable government organizations to meet the ethics requirements.

Systems theory was used as an analytical framework to analyze the developments in integrity policy and the systematic institutionalization of integrity. The conclusion is that some of the components of the integrity framework were given more attention than others. At the national policy level, the predominant focus is on input. This has resulted in a raft of integrity legislation and the dissemination of numerous instruments, models, and the like. The Ministry of the Interior and the Netherlands Court of Audit periodically monitor the adoption and implementation of the prescribed legislation and norms (output).

At this time, however, there is hardly any information available on the actual impact of the adopted integrity policy. There is no indication that the implemented integrity measures have succeeded in enhancing integrity (outcome). According to Huberts, Anechiarico, and Six (2008b), this weakness is certainly not limited to the Dutch situation, but is a worldwide phenomenon. The lack of information made it virtually impossible to evaluate and refine integrity policy in the Netherlands. The relatively large degree of autonomy and responsibility of individual governmental organizations for the design, management, and implementation of integrity accounts in part for the lack of information available about the manner in which organizations institutionalize integrity. Delving deeper into this throughput component can be considered a precondition for any further action. For interdependency and time-sequential reasons, based on systems theory, it makes poor sense to focus on the other components of the integrity policy framework before a proper understanding of the organization and design of the integrity function is reached.

Table 1: Typology of Institutionalization

Form	Type	Subtype	Description	Pros (+) and cons (-)	Size and commitments
Formal	Office organization	central	Centralized integrity office, without integrity officers in de-centralized departments.	(+) Ensures unambiguousness and delegates the responsibility for implementing integrity at a de-centralized level straight to line management. (-) Departments are often quite different, which leads to the question if the central office has sufficient capacity to meet their specific requirements.	- Large but flat organizations with a positive commitment to institutionalize integrity.  - Large but hierarchic organizations with a positive commitment to institutionalize integrity.
		decentral	Centralized integrity office, supported by additional integrity officers in decentralized departments.	(+) Decentralized integrity officers know the specific circumstances of their departments and can therefore support management with specific requirements. (-) The information exchange between the central and decentralized level can be problematic, and leads to the question whether decentralized implementation is in line with the central framework.	- Medium-sized organizations with a positive commitment to institutionalize integrity which value internal support.
Informal	Project organization	internal	Internal interdisciplinary integrity project group, coordinated by the integrity officer.	(+) A broad interdisciplinary project group contributes to a coherent integrity perspective and enhances internal support for integrity. (-) Members of this project group will balance the pros and cons of participation and will compare them with their other work priorities and objectives.	- Medium-sized organizations with a positive commitment to institutionalize integrity which value external support.
		external	The organization's integrity officer participates in an external inter-governmental project group.	(+) Participation in an external project group provides a stimulus for organizations to develop and maintain integrity policy, and it supports the exchange of knowledge and experience. (-) Participation as such does not necessarily lead to the adequate institutionalization of the integrity function.	- Medium-sized organizations with a positive commitment to institutionalize integrity which value external support.
Informal	Line-staff organization	reactive	The organization primarily reacts to occurring incidents and responsibility for integrity is delegated to line management.	(+) Avoids over-accentuation of the integrity issue and strongly appeals to the responsibility of management. (-) Isolates the position of the integrity officer who will experience problems to develop and implement an integrity policy, and keep it on the agenda due to the lack of support of management and other organizational priorities.	- Small organizations with virtually no commitment to institutionalize integrity.
		passive	The organization undertakes no initiatives to organize integrity and responsibility for integrity is delegated to line management.	(+) See reactive (-) As if reactive, with the additional disadvantage that the passive attitude in the organization hinders an adequate institutionalization of the integrity function.	- Medium-sized organizations with a negative commitment to institutionalize integrity.

### 3.4.2 Typology of institutionalization

The typology of institutionalization approaches is derived from the interviews and makes use of the formal-informal distinction described in the theoretical section about institutionalizing integrity. The formal approach is characterized by an explicit, intentional, goal-directed focus on integrity, clear assignment of responsibilities, and accountability structures for specific integrity officials, all of which make the integrity activities visible to anyone inside or outside the organization. The informal approach is characterized by a focus on wider organizational values and beliefs indirectly related to integrity, the absence of specialized officials, an emphasis on the general responsibility of all employees, and strong reliance on the dedication and ability of individual managers, which taken together make integrity activities less tangible and visible. Within these two broad categories, the empirical research data showed that further distinctions can be made between three core types and six subtypes of institutionalization. Size and commitment are also taken into account, and the advantages and disadvantages (pros and cons) of the different approaches are highlighted. Each of the local government organizations included in the study fits into one of the subtypes. The typology, shown in Table 1, demonstrates, and confirms, a clear relation between the size of an organization and the manner in which integrity is institutionalized.

#### 3.4.2.1 Formal approaches: Offices and projects

Large organizations are committed to formally institutionalize integrity and have enough resources to do so. Integrity is not a “side job” of an individual integrity officer, but the concern of a specific coordinating integrity office. The office operates under the supervision of an integrity committee that fulfills an important role in formulating the organization’s integrity policy, deciding on integrity breaches, and monitoring policy implementation. Two subtypes of integrity offices can be distinguished: one centralized, the other decentralized.

In the first case the office operates from a single, centralized point within the organization without the aid of decentralized integrity officials in different departments. The responsibility for implementing policy in different departments is delegated to, and primarily the concern of, line management. An advantage of this approach is that managing the integrity function from a central position without additional integrity officials in the respective departments ensures a uniform approach. This subtype appears in large but flat organizations, where the distance between the central office and other units is small enough for higher management to remain in touch with the work floor.

In opposition to a centralized approach, other organizations follow a decentralized approach to the institutionalization of integrity. This means that in addition to the central office, integrity officers are appointed at lower levels of the organization. One reason for this approach is that the various departments often have their own quite different tasks, cultures, structures—and hence different integrity problems. Decentralized integrity officers understand the particular circumstances of their respective departments and can

support management by taking into account the “couleur locale.” This subtype appears in large hierarchical organizations with a strong commitment to institutionalizing integrity, but where the distance between the central office and the decentralized units is too great for higher management to be in touch with the work floor.

Although all larger organizations invest more time and resources in institutionalizing integrity, considerable differences were found between their respective integrity offices. Only one of the offices has been in existence for more than ten years, actively delivers integrity services and advice on a large scale within the organization, and employs a considerable number of integrity staff. The other two offices are still in an exploring and developing phase, work with only two or three people, do not deliver as many customized services, and are experiencing difficulties regarding their position within the organization.

A small number of medium-sized organizations also display a strong commitment to integrity and structurally institutionalize it by means of specific project groups. Two subtypes of integrity projects can be distinguished: internal and external. The internal project group, resembling Enteman’s (1984) matrix management approach to ethical issues, consists of people from different parts of (and positions within) the organization, such as managers, heads of staff departments, the integrity counselor and coordinator, and representatives of the works council. The internal, multidisciplinary project structure ensures collective responsibility and broad support for integrity within the organization. This subtype appears in organizations that embrace the importance of institutionalization and value internal support for a coherent integrity policy and implementation.

Another way of institutionalizing integrity is to collaborate with an external integrity project group encompassing several connected “neighboring” municipalities. An important role of the project group is to share integrity-related knowledge and experience, and to jointly develop policy and instruments. Imitative practices of this kind, based on the desire of several regional municipalities to develop similar policies and instruments, is known as mimetic isomorphism (Treviño & Weaver, 2003). The same subtype also appears in medium-sized organizations that value the external stimuli of the collective project group to keep integrity on the organizational agenda. The use of project organizations by medium-sized organizations can be attributed to the fact that they are too small to establish their own integrity offices and too big to rely solely on informal structures.

Besides these explicit structural integrity arrangements, both subtypes have in common that they work with detailed and formalized integrity documents and plans. Document analysis was used to evaluate the extent of explicit documentation and formalization of each organization’s integrity policy, which represents an important aspect of formal institutionalization. Integrity plans provide a clear basis for the formulation of the organization’s integrity strategy, commitment, objectives, activities, evaluation, and reporting structures. They also provide a framework for description of the responsibilities of key officials. Once formulated, a plan supports a sustainable integrity approach and makes it resilient to forces within the organization that temporarily deprioritize this



theme. Although such integrity plans are obligatory for all governmental organizations in the Netherlands, only one-third of the studied organizations had adequate plans (all the large and medium-sized organizations that organized integrity in a project structure). The degree of adequacy was determined by compiling an overview of the contents of the integrity plans, comparing and analyzing the plans, and constructing a benchmark table based partly on best practices and partly on the components of the integrity policy cycle discussed earlier (see Appendix 1).

#### 3.4.2.2 *Informal approaches: Passive and reactive*

All of the small and most of the medium-sized organizations follow a line-staff integrity approach and show no clear commitment to formalize and address integrity as an explicit theme. Within this category, reactive and passive (sub)types were distinguished.

Although the small organizations in the study perceive integrity as important, they manage it rather sporadically, implicitly, and pragmatically, based on specific occurrences or incidents. A clear vision of integrity management is generally lacking. This corresponds with previous research showing that smaller organizations usually follow a more informal approach. The respondents reported that integrity is only one of their many responsibilities and therefore is considered not much more than a side task. In these organizations, the responsibility for integrity is largely a matter for line management and only marginally supported by an integrity functionary. This approach, which prevents over accentuation of integrity but often leads to an isolated, unsupported, and relatively weak position for the integrity functionary, resembles Rossouw and Van Vuuren's (2003) "reactive mode" of managing morality. It is a minimalistic, partly symbolic, laissez-faire way of managing integrity, based on a certain awareness that something should be done. The initiatives are limited in scope and depth, and hardly implemented. Lack of resources can account for a more gradual and low-profile integrity approach.

Most of the medium-sized organizations follow a rather passive, or even defensive, approach without making any commitment to formalize integrity. Their general attitude toward integrity-related questions is more negative than in the small organizations. There is no support for institutionalization, because integrity is perceived as conceptually too vague and abstract, or as superfluous (because the organization has no integrity related problems), or as a theme the organization is not ready to implement because of counterproductive dynamics, such as internal reorganization or fusions with other municipalities. The situation resembles Rossouw's and Van Vuuren's (2003) more cynical "immoral mode": the organization does not acknowledge a need to make decisions concerning integrity, and a clear integrity management strategy and the sensitivity to deal with, or talk about, ethics is absent. It amounts to what Waters and Bird (1987) label as moral muteness.

The arguments advanced in these two subtypes to justify refraining from institutionalizing integrity are largely consistent with Soutar's (1995) findings in the private sector. Unlike the organizations that institutionalize integrity by establishing offices or participating in projects, the two subtypes are characterized by the absence of adequate integrity documents or plans. This is so, at least in part, because they simply have no intention to formulate separate integrity plans, and prefer either to comply with externally imposed integrity regulations or to let integrity be an implicit part of a broader HR policy. In some of the organizations that claimed to have an integrity plan, it was later found that the document was not formalized or turned out to be nothing more than a list of existing laws and lacked a central integrity vision and strategy.

### 3.4.3 *The integrity office(r) and other players*

One of the aims of this research is to obtain a clear view of the different actors (both individual officials and departments) that constitute an organization's integrity function. Unlike the practice in other countries, such as the United States (Smith, 2003) and the United Kingdom (Lawton & Macaulay, 2004), the appointment of a so-called integrity officer is not obligatory in the Netherlands. However, officials with integrity-related tasks were found within all the contacted organizations. Most of them held positions in the HR department (61 percent), a minority held a line management position (11 percent), and some were in the financial/audit department (11 percent) or functioned within an actual integrity office (17 percent). Most of the officers, except in the large organizations, fulfilled their tasks part-time and did not have an integrity-earmarked budget at their disposal. In medium-sized organizations, officers could spend on average up to four hours on integrity-related matters, whereas in small organizations, they could barely spend one hour per week. An overview was created of the integrity tasks these officers generally fulfill. Shown in Table 2, it draws a distinction between the four most reported tasks, categorized as designing, implementing, and monitoring integrity policy, and investigating (possible) misconduct.

**Table II:** Integrity officers' tasks

<b>Integrity officer's tasks</b>	<b>Generalized task description</b>
1. Designing	To (re)design up-to-date integrity policy based on specific integrity requirements and approaches; e.g., to formulate integrity plans and to develop instruments and material.
2. Implementing	To advise the organization on and to assist with integrity implementation; e.g., concerning integrity training, oath of office sessions, introduction meetings for new personnel, disseminating integrity related material, and managing the organization's integrity policy by coordinating the efforts of the different key role players.
3. Monitoring	To monitor compliance with integrity guidelines and provide integrity reports; e.g., to guard integrity policy, to detect implementation deficits and to inform on the achieved policy results.
4. Investigation	To conduct, or reflect on, investigations regarding misconduct.

As the typology makes clear, other actors besides the integrity officer are often directly involved in managing integrity within an organization. Rossouw and Van Vuuren (2004) label these actors who fulfill integrity-related tasks as “key role players.” They operate at a strategic, systems, or operational level. At the strategic level, they decide what integrity approach the organization should follow based on its vision and mission. At the systems (staff) level, they translate and implement the strategy, design specific integrity structures, procedures, and plans, and then apply them in the daily activities (operational level) of the organization. These three levels were used to identify the most important role players (and their tasks) in the local government organizations studied (see Table 3).

**Table III:** Key role players

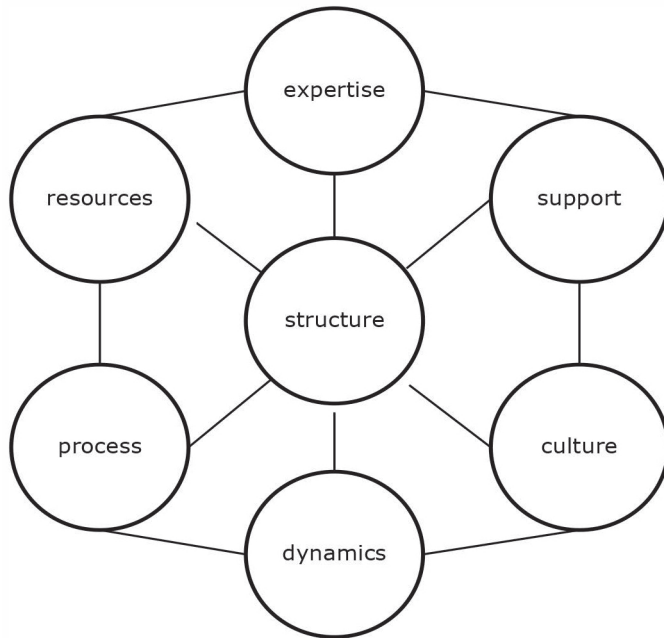
Level	Players	Description
Strategic	Top management	Top management is considered to be the most important role player and as the first responsible actor for integrity management. They are responsible for the design and dissemination of the organization’s integrity policy, the monitoring of the policy’s progress and have to set the ethical example. The integrity committee of the larger organizations operates at the strategic level.
	Integrity office(r)	Integrity officers or offices develop the integrity policy and instruments, inform, assist and advise both line and top management on the integrity policy and investigations. They coordinate and monitor compliance with integrity guidelines, provide content for integrity reports and (sometimes) participate in integrity project groups.
Systems	HR department	HR officials advise line management, are often involved in formulating integrity policy and guidelines, conduct investigations in (alleged) integrity violations and advise which specific sanctions might be applicable.
	Financial/audit department	The Financial/audit department organizes and controls the administrative processes, the segregation of functions, and monitors (the legality of) the spent budgets.
	Integrity counselors	The (confidential) integrity counselors are considered to be the ‘eyes and ears’ of the organization. They listen to integrity-related issues and complaints of employees, and advise them how to report those complaints according to the reporting lines of the organization.
Operational	Line management	Line management is responsible for implementing integrity management within their (sub)units. Integrity is integral to their management responsibilities. They translate integrity policy and emphasize the importance of ethical behavior on the work floor, fulfill signaling and controlling tasks and have to act as a role model. Because they are closest to the employees they have the best view on how they function and have the power to address their behavior.

### 3.4.4 Critical conditions for institutionalizing integrity

In addition to identifying the different ways in which organizations institutionalize integrity and the key role players involved, the interview subjects were also asked more specifically to indicate positive conditions (what works/should be promoted) and negative conditions (what undermines/is to be avoided) for institutionalizing integrity in their organizations. Based on their answers, the most important (critical) conditions for institutionalizing integrity were categorized, as shown in Figure 2. Taking these conditions into account can provide key role players, especially at the systems and strategic levels, with a better understanding of what is needed to make the institutionalization of integrity a success.

Providing sufficient *resources*—the allocation of adequate funding and enough time for integrity officials to perform their jobs properly—is considered to be an important condition for the institutionalization of integrity (Herrmann, 1997; OECD, 2008b; Smith, 2003). *Experience* in terms of skilled and enthusiastic staff is another important condition. Besides the selection and appointment of (critical and committed) integrity experts (who know the organization and have solid internal networks and irreproachable reputations), it is equally important to share integrity related knowledge and expertise with both internal and external stakeholders to give substance to the internal integrity function. *Support* by (top) management of integrity officials, and of their efforts to keep integrity on the organization’s agenda at all times and levels, is a prerequisite for the institutionalization of integrity. It prevents an organization’s ethics practices from being ignored (Treviño & Weaver, 2003). Lack of support also leads to a situation where the integrity office(r)s become isolated and end up in an ineffective vacuum. The existence of integrity legislation, as a form of external pressure on organizations, provides another source of support for the integrity office(r)s, because it equips them with a clear basis and argument to carry out their responsibilities.

**Figure II:** Critical Conditions for Institutionalizing Integrity



Integrity can be supported by means of ad hoc initiatives, but it is related to the “deeper” organizational *culture*, which is much more challenging to change. An organizational culture that is receptive to integrity issues, resilient to political pressures, and characterized by a willingness and openness to address and discuss ethical issues is crucial for organizing integrity. The same applies to organizational *dynamics*. Organizational change,

both internal and external, influences integrity initiatives. In more dynamic situations, attention to integrity policy and institutionalization seems to diminish. Sources of (internal or external) organizational dynamics, such as restructuring or mergers with other organizations, can lead to integrity's temporarily becoming a "luxury" item. Treviño and Weaver (2003) point out that ethics programs need a relatively stable background and that transitions pose serious problems. At the same time, however, such dynamics may turn out to create a "window of opportunity" for institutionalizing integrity. Especially in situations where two organizations merge, this sometimes may prove to be the right time to analyze differences in integrity measures and approaches and to establish a new integrity function.

The institutionalization of the integrity function is reported to be a gradual *process* that evolves over several years. Therefore, it is important to take into account (and to influence) the above-mentioned conditions in the process of institutionalizing integrity within the organization. Such an approach enables the establishment of an organization with integrity in a systematic manner based on experience, and makes it possible to tailor a specific integrity design to the organization. The harmonization and, when appropriate, integration of integrity with other, related organizational themes (such as law, human resources, audit, or finance) ensures continuous but "spread out" attention to integrity, thus avoiding the risk of "integrity exhaustion."

In the end, this all leads to the development of a specific integrity *structure* (see. Table 1) that is appropriate to the organization, through taking into consideration its size, commitment, specific circumstances, and the (dis)advantages of each of these structures. Once a basic integrity structure is in place, our findings demonstrate, it contributes to the further institutionalization of integrity.

### 3.5 Conclusions and Recommendations

The preceding analysis of the integrity policy of the Dutch government reveals that there is little concern about the question of how integrity is to be institutionalized—in terms of the appointment of specific integrity officials, formalization processes, and explicit integrity structures. This can be attributed to the lack of any provision for institutionalization in the central integrity legislation, combined with a decentralized system that provides governmental organizations with a great degree of autonomy and responsibility for the formulation, design, implementation, and enforcement of integrity policy. In light of this, the appointment of a formal integrity official should be considered a minimum requirement for any future integrity legislation. An official would support the continuity, coordination, implementation, and coherence of an integrity policy, enable the accumulation of integrity-related expertise, and underline the importance of the organization's integrity ambitions. Thus, a specialized and pivotal official can be considered a necessary condition for the institutionalization of integrity in organizations.

However, merely issuing integrity provisions is not sufficient, since implementation is often the problem (Demmke & Moilanen, 2012; Herrmann, 1997). This is certainly the case in the Netherlands, where integrity plans have been obligatory for some years, but only a third of the municipalities included in this study comply with the legislation and have adequate integrity plans in place. This implementation deficit is the result of unclear and undefined legislation, which permits a fragmented listing of compulsory items, and the omission of a clear strategy to manage and institutionalize integrity. Clear legislation and central enforcement are necessary.

Most of the organizations studied, with the exception of the larger ones and some of the medium-sized ones, do not have formal integrity structures. These organizations embed integrity in an indirect, implicit, and casual fashion, strongly relying on mechanisms such as mutual trust and informal systems of social control. The lack of resources and support, but also specific organizational dynamics and the perception of integrity as a vague and superfluous theme, turn out to be an impediment to formal institutionalization efforts. The typology, grounded in empirical research, illustrates that specific organizational circumstances and size do influence the way in which organizations manage integrity. Therefore, the commonly prevailing one-size-fits-all solutions should be reconsidered.

The typology has to be subjected to further testing by conducting a large-scale study. Further elaboration will lead to more robust findings and perhaps have an influence on institutionalization efforts. Further work is also needed to combine the specific conditions with the typology—which takes account of the organization's size and integrity commitments, and the (dis)advantages of each of the subtypes. The effort would certainly be worthwhile, because it could help managers to identify the most appropriate and feasible approach to institutionalizing integrity in their organization.

Another question for future research is whether a formal approach, an informal approach, or a combination of the two is more appropriate. Especially for small and medium-sized organizations—which in this study exhibited a rather worrying reluctance to incorporate formal institutionalization elements—this seems a particularly important question. Would they not be better off if they incorporated some formal elements that would enhance their integrity system in the long run? This would, of course, have to take place in a manner and at a pace suitable to the specific organization. The conditions for institutionalizing integrity presented in Figure 2 could be helpful in this endeavor.

Besides these topics for future research and elaboration, the general observation can be made that more work is needed in order to open up the seeming “black box” of institutionalizing integrity. This is most certainly the case in public administration, and attempts should be made to examine the lessons that can be learned from business ethics, which seems to be more advanced in this regard.

During the research, a vexing question arose that is not discussed above, but is worth noting. Two dominant views on managing integrity prevail in the current debate and

research literature. Apart from the formal-informal distinction that structures the present study, the well-known compliance-integrity dichotomy (Paine, 1994) is often used in research on the institutionalization of integrity. The question pertains to how these two approaches differ and relate. Intuitively, one would proclaim that the formal and compliance approaches strongly converge, as do the informal and integrity approaches. But if one were to visualize these different approaches as the extremes of an imaginary Cartesian plane, some interesting kinds of integrity initiatives might emerge in each of the four quadrants. A thorough examination and understanding of the relationship between these two approaches could provide a new and enriched conceptual framework that could serve both descriptive and prescriptive purposes.

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## Appendix I:

### Elements of an Integrity Plan

Ambition	1. Mission & vision	<i>Defining the intended aims of the organization's integrity ambitions and broadly describing the wanted results (objectives) for a medium to long period</i>
	2. Policy & measures	<i>Assessing the basic elements of prescribed integrity legislation and measures, the extend of actual compliance with these elements and the additional actions to be taken in this respect</i>
	3. Strategy	<i>Formulating a clear integrity strategy, based on the organization's ambitions, that ensures coordination between the various integrity initiatives and identifies both what specific actions should be taken to reach the objectives and how to monitor the accomplishments</i>
Organization	4. Actors	<i>Describing the roles, positioning and accountability structures of the different actors, which make part of the organization's integrity function, and defining their responsibilities for the formulation or implementation of (certain parts of) the integrity strategy and plan</i>
	5. Means	<i>Determining the needed amount of time, budget and other means (such as communication) for the execution of the described integrity tasks for each of the actors</i>
Efforts, realization and evaluation	6. Efforts & realization	<i>Monitoring the organization's specific integrity efforts and objectives and determining if, and to what extent, they contribute to the intended policy outcomes</i>
	7. Reporting & evaluation	<i>Framing (annual) integrity reports based on the organization's ambitions, the accomplishments of the different actors and their achievements</i>  <i>Evaluation of the organization's integrity policy and determining whether the followed strategy, the integrity actions and structures work effectively and efficiently to realize the organization's ambitions or if they have to be readjusted</i>



The background features a large, faint number '4' on the right side. On the left, there are several interlocking gears of various sizes, some of which are semi-transparent, creating a layered effect. The overall color palette is light gray and white.

# **CHAPTER 4.**

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**INTEGRITY MANAGEMENT AS  
INTERORGANIZATIONAL ACTIVITY**

## Abstract

Much research on integrity management centers on the internal activities and measures individual organizations may employ to foster integrity. Using institutional and cultural theory, this article, conversely, explores how organizations can cooperate with peer organizations to manage integrity. Based on empirical research, 23 different integrity partnerships were mapped and analyzed, resulting in four categories: the integrity workshop (sharing instruments), the integrity pool (sharing capacity), the integrity forum (sharing knowledge), and the integrity megaphone (sharing influence). This categorization offers a first overview of existing forms of interorganizational cooperation in integrity management. It identifies the characteristics, practical benefits, and pitfalls of the four integrity partnership categories. It demonstrates that integrity management is not necessarily “the wheel” that organizations have to reinvent and keep moving on their own, and it provides a basis for future research in this under-researched area.<sup>3</sup>

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<sup>3</sup> This chapter is previously published as: Hoekstra, A. Talsma, J. & Kaptein, M. (2016). Integrity management as an interorganizational activity: Exploring integrity partnerships that keep the wheel in motion. *Public Integrity*, 18(2), pp. 167 -184

## 4.1 Introduction

Since the early 1990s, public and private organizations have devoted more attention to ethics and integrity management (Huberts, Maesschalck, & Jurkiewicz, 2008; Treviño & Nelson, 2004). Research has demonstrated that external challenges — like integrity scandals, reputation issues, increased media attention, and new regulations — have contributed to this rise in attention (Treviño, Den Nieuwenboer, Kreiner, & Bishop, 2014).

Institutional theory (Scott, 2008) and cultural theory (Douglas, 1970) both suggest that external challenges lead to cooperation between organizations, because they are more capable of dealing with uncertainties collectively than on their own. Scholars have also suggested that organizations benefit from sharing knowledge and experiences in their efforts to manage integrity. Integrity officers benefit from networking with counterparts from other organizations to develop integrity programs and increase expertise (Adobor, 2006; Morf, Michael, Schumacher, & Vitell, 1999; Petry & Tietz, 1992; Weber & Fortun, 2005). This seems all the more important as integrity efforts often lack internal support, and even encounter internal resistance, which requires external support (Hoekstra & Kaptein, 2013; Treviño et al., 2014).

Research into the interorganizational dimension of integrity management is, however, limited. Much literature concentrates on intraorganizational activities that organizations can engage in to manage integrity. Codes, hotlines, dilemma training, risk analysis, audits, and the appointment of specific officers are all part of the array of activities that can be used to foster integrity (Lawton, Rayner, & Lasthuizen, 2013; Wulf, 2012). But until now, little is known about how individual organizations can cooperate with peer organizations to manage integrity. For example, no research has been conducted to date on whether organizations cooperate in this area with other organizations. Nor is there research into ways organizations could cooperate with other organizations and the associated reasons and benefits.

Given this lack of knowledge, this research explores how organizations can cooperate in managing integrity. This article provides an overview of the various modes of integrity management cooperation, referred to here as integrity partnerships. It specifies the characteristics of the distinct types of partnerships, and it identifies the benefits and concerns of each. As such, it offers an interorganizational perspective on integrity management, complementing the existing body of knowledge. From a more practical point of view, it will show organizations the different options for cooperation in this area. It demonstrates that integrity management is not necessarily “the wheel” that organizations have to reinvent and keep moving on their own.

For this study, organizations in the Netherlands that engage in integrity partnerships were identified. Based on interviews with integrity officers, the partnerships were mapped, analyzed, and categorized. The key definitions, literature, and theories are discussed in the next section. We then present our research methodology and findings. In addition to what integrity partnerships have in common, four distinct categories are introduced

and explained. In the concluding section, the results are discussed and reflected, and questions for future research are formulated, followed by some practical and policy considerations.

## **4.2 Definitions, Literature, and Theories**

This section starts with an introduction to the study's central concepts. Gulati's (1995) definition of cooperation is illustrated and supplemented with additional literature. This is followed by an outline of institutional theory and cultural theory. Both theories pay attention to the influence of external factors on organizations and provide insights into cooperation among organizations. Elements from both theories were used to formulate the interview questions.

### **4.2.1 Definitions**

The terms "ethics" and "integrity" are often used as synonym. Some conceptual clarity is thus needed. According to Huberts (2014), integrity refers to acting in accordance with relevant moral values and norms. It is about doing the right thing, in the right way, within a specific context — for instance, in an organization. Integrity primarily concerns the process of governance, whereas ethics primarily refers to the policy content and outcomes. Typical examples of ethical questions include whether a country should go to war, whether drugs should be legalized, and to what extent an organization should be accountable to its employees, its external stakeholders, and the environment.

Integrity management, the focal point of this article, is defined here as a set of (systematic) efforts to promote integrity. It concerns the sum of specific activities and instruments used to foster organizational integrity. Integrity management is, in this research, explored from an interorganizational, cooperative perspective. According to Gulati's (1995) seminal definition, cooperation refers to a purposive relationship between two or more independent organizations that involves the exchange, sharing, or co-development of resources or capabilities to achieve mutually relevant benefits. Building on the previous definitions, integrity partnerships can be described as cooperative arrangements between two or more independent organizations intended to promote and manage integrity.

### **4.2.2 Cooperation literature**

Gulati (1995) addresses three core aspects of cooperation, namely, that it has a certain aim, a certain form, and certain benefits. The benefits are often expressed in terms of improving effectiveness, cost-efficiency, knowledge development, and market position (Kaats & Opheij, 2012). Specific activities (such as the exchange of knowledge, sharing experiences, or the joint development of instruments) and forms of cooperation can vary. Forms of cooperation can be distinguished in terms of formal and informal cooperation, intra- and interorganizational cooperation, and vertical, horizontal, and diagonal cooperation (i.e., partners in a chain, similar partners, and partners from different sectors) (Child, Faulkner, & Tallman, 2005; Smith, Carroll, & Ashford, 1995).



According to Van der Krogt and Vroom (1989), cooperation and the accomplishment of goals is facilitated by organizational and contextual similarities (e.g., structure, culture, legislation, products, developments, and issues), but hampered by differences and competition. Recent research in the Dutch public sector has demonstrated that cooperation, for example between municipalities, is increasingly popular, but also complicated (Aardema, 2010; Boogers, 2013; De Boer, 2014; De Man, Kensen, & Weitering, 2014). It appears that organizations are often preoccupied with their own stakes and positions. Since mutual trust is lacking, and organizations are afraid of losing control, a strong emphasis has emerged on structures, competences, and conditions. Concern with these matters distracts partners from formulating a clear vision on the actual content and purpose of the cooperation. This hinders cooperation from being successful.

#### 4.2.3.1 *Institutional theory*

Institutional theory focuses on “the process by which structures, including schemas, rules, norms, and routines, become established as authoritative guidelines for social behavior” (Scott, 1995, p. 408). According to Zucker (1987), this process is strongly influenced by external factors and threats. New governmental policies and regulations, increased supervision and media attention, as well as changing societal expectations, are examples of such factors that influence the development and design of organizations.

Organizations adapt to these environmental influences because they have an urge to survive and to minimize uncertainties. Organizations model themselves on other organizations (isomorphism) in their sector they regard as legitimate and successful (DiMaggio & Powel, 1983; Selznick, 1996). Other ways of handling pressure involve the coordination of conformity and attempts to influence external demands, expectations, and regulations (Scott, 2008).

Integrity management itself can be seen as an institutionalization process (Brumbach, 1991; Hoekstra & Kaptein, 2013; Purcell & Weber, 1979), as it involves the development of processes, structures, and systems centered on organizational integrity (Foote & Ruona, 2008; Roth, 2012; Tenbrunsel, Smith-Crowe, & Umphress, 2003). Several studies point out that elements related to institutional theory, such as external pressure (Treviño & Weaver, 2003), imitation processes (Weaver, Treviño, & Cochran, 1999), and reputational considerations (Chavez, Wiggins, & Yolas, 2001), influence organizations in their efforts to manage integrity. This study takes such insights into account in analyzing integrity partnerships. What is the role of partnerships in achieving sectoral uniformity and conformity? And do they also attempt to influence or even change integrity legislation? These aspects of institutional theory are part of this research.

#### 4.2.3.2 *Cultural theory*

Cultural theory has its origins in anthropology (Douglas, 1970) and was later introduced in other social sciences (Maesschalck, 2005). Cultural theory explains why and how entities (individuals, groups, or organizations) relate to each other. According to this

theory, relationships between entities are determined by the extent to which they experience group dependency and external pressure. The scores on both dimensions (low to high dependency, and low to high pressure) can be combined into four types of social constructs that are labeled as hierarchical, individualistic, egalitarian, and fatalistic (Jenkins-Smith, Silva, Ripberger, & Gupta, 2012).

Hierarchical constructs are characterized by a strong group sense and a large number of externally imposed obligations. They are marked by formalism, expertise development, role division, strict structures and procedures, control, and accountability systems. Individualistic constructs, on the other hand, lack this strong group sense and external obligations. They are characterized by a minimal desire for cooperation because they value individual freedom and responsibility. The egalitarian construct displays a strong group sense and a minimum of external pressure. It demonstrates a desire for solidarity, equality, negotiation, and consensus. Fatalism combines strong external obligations with a weak group sense. This type is characterized by feelings of unpredictability, unchangeability, and despair that lead to isolation.

Integrity partnerships can be considered as social constructs in which organizations cooperate in efforts to manage integrity. Insights from cultural theory are used to study integrity partnerships. Do feelings of external pressure and group dependency contribute to the creation of integrity partnerships? Are integrity partnerships characterized by formality and hierarchy, or do they follow a more informal and egalitarian approach? These aspects of cultural theory are part of this research.

### **4.3 Methodology**

The main objective of this research is to explore integrity partnerships and to analyze their different forms and characteristics. The analysis identifies the “conditions under which a finding will occur, but [it] also helps us form the more general categories of how those conditions may be related” (Miles & Huberman, 1994, p. 173). Constructing such categories “provides one with a manageable way of describing the empirical complexities of many hours of observation or summarizing hundreds of pages of interview transcriptions” (Constas, 1992, p. 255).

The exploration of categories is based on interviews, and thus grounded in empirical data. According to grounded theory (Glaser & Strauss, 1967), scientific truth results from observation and the consensus of observers on what they have observed (Suddaby, 2006). Reality is therefore created in a process of interpretation where meaning is produced by researchers. Consequently, this approach makes no claims about objective reality, unlike the natural sciences.

### **4.3.1 Data collection**

When little knowledge is available about a particular phenomenon, as in the case of integrity partnerships, Maso (1987) and Van Thiel (2010) suggest approaching individuals who are directly involved in it. Participants in such partnerships were therefore approached accordingly. The respondents had a diverse range of job titles, including integrity officer, integrity coordinator, integrity advisor, integrity investigator, ethics officer, and compliance officer.

Data collection started by approaching interview candidates who were already known to the researchers, given their knowledge of this field of research. Since this type of “convenience sampling” (Weiss, 1994) can lead to an incomplete and preconceived impression, a “snowball sampling” (Babbie, 1989; Boeije, 2008) approach was also employed. This consisted of repeatedly asking the selected interviewees about other integrity partnerships they knew of that could be of relevance to the study. “Snowballing occurs when you follow such a lead and let those new ones result in identifying yet other possible interviewees” (Yin, 2011, pp. 88–89). In addition, Internet searches were conducted. The words “integrity,” “ethics,” and “compliance” were combined in every possible variation with words like “partnership,” “cooperation,” and “collaboration” as search parameters. In sum, a variety of sampling strategies was used, resulting in an overview of existing integrity partnerships. Although we make no claim to exhaustiveness, as many partnerships as possible were mapped. Twenty-three different integrity partnerships were found, for which 30 in-depth interviews with respondents from different sectors were conducted (Table 1).

**Table 1:** Interview Participants Clustered by Sector (n = 30)

<b>Sector</b>	<b>Public sector</b>	<b>Private sector</b>
<b>Sub-sector</b>	Ministries & agencies (n = 7)	Real estate (n = 5)
	Provinces (n = 1)	Financial (n = 4)
	Municipalities (n = 6)	Corporate (n = 2)
	Water district boards (n = 1)	Legal profession (n = 1)
	Education (n = 1)	Waste collection & recycling (n = 1)
	Judiciary (n = 1)	
<b>Total</b>	17	13

The interviews were held between July and November 2013 and lasted 60 to 90 minutes. A standardized, semi structured, interview protocol ensured that each interviewee was asked the same questions with the same formulations and clarifications. The questions were based on the theories and literature used. However, since the aim of the study was to acquire new knowledge and insights, the questions were not used to empirically test the theories on which they were based.

To increase the willingness of interviewees to take part in the research and to reduce the risk of socially desirable answers, strict confidentiality was guaranteed. As a result, the responses cannot be traced back to specific individuals or organizations. Furthermore, it was stressed that the research's goal was to gain a better understanding of the nature of integrity partnerships, not to come up with normative judgments. This resulted in an increased willingness to participate in the study, and the interviewees opened up about shortcomings and doubts regarding the partnerships in which they were involved.

### **4.3.2 Data processing and analysis**

The 30 interviews were recorded and transcribed, resulting in 702 pages of text. This large amount of research data was processed in a structured manner by means of a data matrix (Miles & Huberman, 1994). This is an expedient method to incorporate information from several cases in an orderly, standardized format.

In the matrix, respondents were positioned on the y-axis, and the interview questions on the x-axis. The cells were filled with the interview responses, consisting of both literal quotations and compromised text fragments. Furthermore, a number of more closed statements were presented to the respondents. In these cases, the cells contain figures instead of words. The Appendix provides an overview of these closed-ended scores. Given the exploratory character of the study, extra space was provided to include case-specific information not covered by the standard set of questions.

Following the methodology of grounded theory, the data were collected and analyzed simultaneously. This process is known as “constant comparison” (Suddaby, 2006). Decisions about what new data should be collected were not determined by a priori hypotheses, but by an ongoing interpretation of data and emerging first conceptual categories. This process is known as “theoretical sampling” (Suddaby, 2006). Constant comparison and theoretical sampling go hand in hand (Boeije, 2008). Based on first analysis and emerging provisional categories, it becomes clear what additional data should be looked for next, to gather new insights or to expand and refine concepts already gained (Kolb, 2012). This process makes it possible to explore and describe variety in the studied phenomenon. “Sensitizing” concepts in the research questions and literature study served as guidelines for the selection of relevant interview data (Boeije, 2008; Van Thiel, 2010).

Repeated discussion, reordering, redefinition, and summarizing of the provisional categories ultimately resulted in four categories. These final categories are both comprehensive, since all the studied integrity partnerships could be included, and mutually distinctive. Each category was given a name reflecting its essence.

## 4.4 Research Findings

Based on the interviews, 23 different integrity partnerships were mapped and subdivided into four distinct categories. The first part of this section reflects on some aspects these partnerships have in common and how they are valued. The second part introduces the four categories with their main characteristics, benefits, and issues. Both parts are based on the data matrix. The Appendix gives an overview of the scores on the closed-interview questions, and Table 2 provides a general overview of the four integrity partnership categories.

### 4.4.1 *What integrity partnerships have in common*

In the process of describing the case variety, much attention was paid to the differences between categories. However, some similarities also appeared. The Appendix (in particular the items with extreme overall scores), in combination with the answers to the open questions, reveals some interesting features that most integrity partnerships have in common. First, the reason for organizations to join an integrity partnership can often be traced back to the occurrence of new external integrity rules (often as a reaction to high-impact integrity breaches). The urge to exchange experiences and learn from one another to address the challenge, is a second aspect that characterizes most integrity partnerships. Organizations long for efficiency in their efforts to manage integrity, and their integrity officers often report being too isolated to be effective. Third, external cooperation also leads to more support within the organization to legitimize integrity activities and keep integrity on the agenda. Fourth, organizations join integrity partnerships voluntarily; they are not forced by others to engage in a partnership. This also explains the egalitarian, nonhierarchical nature of integrity partnerships.

**Table 2:** Overview of integrity Partnership Categories

Type	Activities and motives	Organizational characteristics	Reported benefits (+) and concerns (!)
II Integrity Workshop (n=5)	joint development of practical integrity instruments  lack of internal means to comply with external integrity regulations	- mostly between public organizations (4 of 5) - organizational similarity is high - moderate number of participants (7 to 10) - limited lifespan (approximately up to a year) - high intensity of cooperation - rather informal setting - organizations are autonomous	+ creating higher-quality instruments at lower costs in a shorter time + increasing internal support for integrity as a positive side-effect ! need to tailor developed instruments to specific needs of individual organizations ! free rider behavior whereby some participants contribute more than others to development process
III Integrity Pool (n=4)	sharing integrity capacity between organizations  lack of, full-time available, integrity experts	- only between public organizations - organizational similarity is high - low number of participants (2 to 3) - evolves from occasional to more enduring cooperation - high mutual dependency and intensity - formalized cooperation based on binding agreements/contracts - organizations less autonomous	+ diversity, flexibility, and continuity of integrity capacity + lower costs due to sharing integrity experts ! feelings of frustration and cultural differences require clear communication and attention ! capacity claims require coordination and (financial) agreements between organizations
III Integrity Forum (n=8)	exchanging integrity knowledge and experience  lack of internal sparring partners for integrity officers	- within the public and private sector, and also mixed forms - participants more diversified - higher number of participants (sometimes > 100) - longer-lasting (mostly several years) - nonbinding, informal relationships - members participate on personal title - organizations autonomous	+ learning and network opportunities for integrity officers increase due to orchestrated meetings and exchange platforms + providing external back-up for internal resistance and developing professionalism are important benefits of peer interaction ! decreasing confidentiality, openness, and involvement once group of participants is inconsistent or too large ! finding the right form, frequency, and level of diversity is key for productive meetings
IV Integrity Megaphone (n=6)	influencing sectoral reputation and integrity legislation  lack of influence by individual organizations	- mostly between private organizations - larger degree of diversity among participants - higher number of participants (sometimes > 100) - longer-lasting partnerships (mostly several years) - high mutual dependency - binding agreements, formalized and compulsory activities - organizations remain autonomous	+ sectoral norms, ambitions, and certification decrease risk of integrity breaches that could affect entire sector + joining forces creates more opportunities to influence legislation ! harmonization can hold organizations back from higher levels of integrity ambitions ! collective action requires conformity, binding agreements, and affects organizational autonomy

Fifth, most respondents reported that cooperation is facilitated by resemblances. Organizational similarities (same problems, structure, and culture) generally enable fruitful cooperation within integrity partnerships. Finally, all respondents valued the partnerships positively. On a scale from 1 to 10 (low to high appreciation) the average score is 7.5, with a range from 6 to 9. This indicates that the interviewees seem satisfied with the integrity partnerships.

#### **4.4.2 How integrity partnerships differ**

Besides these general characteristics and resemblances, the studied integrity partnerships also turned out to be very different. The wide variety of names and titles used for the partnerships indicates these differences. Terms such as working group, platform, project, network, agreement, center, circle, round table, expert group, and sounding board are used. From this array, four distinct integrity partnership categories emerged from the gathered research data. The main distinctions between the four categories are primarily related to the different objectives pursued. Or, to link up with Gulati's (1995) definition, they differ in their purposes. Although some partnerships pursue several goals, one core objective could always be identified. The respective categories are labeled as integrity workshop (sharing instruments), integrity pool (sharing capacity), integrity forum (sharing knowledge), and integrity megaphone (sharing influence).

##### **4.4.3.1 Integrity Workshop (Sharing Instruments)**

The integrity workshop is aimed at developing and sharing integrity instruments. Laws and regulations generally require the adoption and implementation of these instruments. Workshops are strongly susceptible to legal obligations and other forms of external pressure, such as critical policy evaluations. When individual organizations lack the time and expertise to meet these external requirements, they may choose to cooperate. In this way, they avoid having to develop the required integrity instruments on their own. Workshop integrity partnerships are able to develop higher-quality instruments at lower costs and in a shorter period of time.

Although the instruments are often developed for an entire sector (e.g., municipalities, provinces, water authorities, government ministries), the work is done by a small delegation of representatives. Of the five analyzed workshops, only one did not belong to the public sector. Workshop partners must be similar if their goal is to develop instruments that are of use to all of them. Since public sector organizations are more comparable in terms of organizational structure, culture, and legislative requirements, this seems logical. Moreover, competitive relationships that could hinder cooperation (often the case in the private sector) are generally absent between public partners.

A revision of the Dutch Civil Service Act and the agreed-upon integrity standards compelled governmental organizations to implement new instruments in 2006. Therefore, it is no surprise that all of the workshops found in this study originated after 2006. Some integrity partnerships in this category developed only one instrument, whereas others produced a

complete integrity “toolkit.” An example of the latter is the Dutch Water Sector. Together, the various water authorities developed integrity instruments and guidelines for managers, HR professionals, and employees. A specially designed website includes an overview of integrity legislation and frequently asked questions, a format for integrity plans, and a list of specific dilemmas, among other things.

Workshops commonly have seven to ten participants and remain rather informal. The respondents emphasized this informality. It makes room for the creativity that is needed to develop new instruments. As one respondent reported: “That is one thing I really cherish. As soon as we start acting like bureaucrats, we lose our power as working group.” The process benefits from small, smoothly functioning teams. Compared to other categories, the workshop scores highest on intensity of cooperation.

One feature of workshops is that they have a limited lifespan. When the job is done, the partnership is dismantled. Enthusiasm for participation in workshop integrity partnerships varies among participants, and they do not all see it as a strong obligation. The downside of informality, combined with this sort of laxity, is that it can lead to “free-rider” behavior: “Unfortunately, as often happens, you notice that people drop out, and then everything turns around a core group. That is what is happening at the moment. We want everyone [in the project group] to take part; otherwise, it becomes impossible,” as one interviewee said.

Moreover, although the workshop generally operates as a pressure cooker, the development of practical instruments is sometimes delayed by reaching consensus. Moreover, the need for harmonization can lead to integrity instruments that are not entirely applicable for each individual organization. In spite of these drawbacks, the partners retain a high degree of autonomy along the way; —if, how, and when the developed instruments are implemented remains their own decision.

#### *4.4.3.2 Integrity Pool (Sharing Capacity)*

The purpose of the integrity pool is to share integrity professionals, such as investigators, trainers, or specialized integrity advisors, between organizations. This is especially beneficial for smaller organizations, since they often lack resources to have such experts permanently on payroll. Moreover, the pool ensures the availability of integrity expertise during holidays, peak periods, or sick leave: “Even if someone’s on leave, it is almost guaranteed that the work gets done,” as one of the interviewees stated. At the same time, cooperation generates more work for integrity experts, which increases their professionalism. All in all, the pool leads to a more efficient use of human resources. It creates flexibility and ensures continuity.

A pool tends to develop gradually. Generally, an urgent integrity issue forces an organization to ask a more experienced “peer” organization for specialized investigators. If this first collaboration is successful, the partnership often evolves from occasional assistance to a more sustainable and substantial relationship. For instance, two Dutch



municipalities started to cooperate when the smaller one was confronted with an integrity violation and needed experienced investigators. The bigger one was able to provide the experts. But in the slipstream of this incident, the smaller municipality felt the urge to set up a broader range of preventive integrity policies. This led to an extensive collaboration in which integrity advisors and trainers were also provided.

There are two versions of the pool. The first is reciprocal, where organizations provide specific integrity expertise and experts to one another. In the second version, one organization delivers integrity professionals to another for a fee. In both cases, binding agreements, and legal contracts about the nature of the services and financial compensation form the basis of the pool. As one of the interviewees remarked: "Where does the responsibility lie, who is responsible for the costs? All of this should be properly and formally arranged." As a result, the pool shows a higher degree of formalization than the other categories.

Pool integrity partnerships require a close relationship, which explains why the number of partners is limited to two or three. The intensity of the cooperation in the pool is almost as high as in the workshop, and competition between the partners is also nonexistent. Moreover, the participating organizations must be alike: "The fact that cooperating organizations are similar means that you know the issues, you know the roles," as one interviewee stressed. This explains why only public organizations participate in pool integrity partnerships.

The close relationship is illustrated by the fact that the pool scores highest on the extent of dependency: "With investigations, it is often the case that at one moment there is nothing to do, but the next moment, you're confronted with four serious incidents. Assigning capacity to different investigations, especially when they occur within different organizations, can become problematic" as one interviewee argued. This dependency leads to the need for formal agreements and contracts. The binding character may explain why pool integrity partnerships are relatively scarce in this study: only four of the 23 studied partnerships belong to this category.

Another challenge the respondents identified is the risk of misunderstanding and frustration. The presence of integrity investigators from another organization can be experienced as threatening by employees of the "hiring" organization. Cultural differences and coordination issues were also reported as points of concern. It is therefore considered important to appoint liaisons who will be responsible for the communication between the cooperating organizations.

#### 4.4.3.3 Integrity Forum (Sharing Experiences)

The integrity forum offers integrity professionals the opportunity to exchange knowledge and experiences. This is important because integrity professionals often feel isolated. One of the interviewees stated, for instance: "We are unable, or only to a limited extent, to debate issues within our own organization since we are mostly a 'one-man band'." External backup

is also desired because integrity officers often face internal resistance: “You’re seen a bit as a necessary nuisance. You need to be able to handle that” one of them responded. Besides the solitary position and difficult role, the integrity profession is also regarded as relatively new; integrity professionals still have to develop professional know-how. Interaction with occupational peers is important in this process. All in all, the forum prevents integrity officers and their organizations from having to deal with these challenges on their own.

The forum can take different shapes; some are small, others have numerous participants. Forums exist both online (via social media or e-mail groups) and offline (via organized gatherings and events). The Dutch National Integrity Office, for example, regularly organizes events for integrity officers. Up to 80 participants meet, three or four times a year, to interact with colleagues from other organizations. Presentations, lectures, workshops, and discussions are among the activities that take place during these afternoon sessions, in which there is also plenty of room for informal networking. Topics that have been dealt with include ethical leadership, risk analysis, integrity investigations, dilemma training, and reflections on the role of integrity officers.

Compared to other categories, forum members seem to be more intrinsically motivated. External pressure and motives, such as rule compliance and efforts to influence legislation or to avoid the risk of the organization lagging behind, score much lower in this category. Moreover, the forum is characterized as a voluntary, nonbinding, egalitarian partnership with low degrees of intensity, formality, and dependency. Participants connect to learn, free of any obligations. Perhaps it is this noncommittal approach that accounts for the (slightly) higher appreciation of this category among the respondents.

A certain level of similarity is, as mentioned before in the discussions of workshops and pools, a prerequisite for cooperation between organizations. This also applies to the forum, although to a somewhat lesser extent. The interviewees stressed that diversity is an important aspect, since it increases the opportunity to learn and gain fresh, new insights. This explains why forums are often “hybrids,” consisting of both private and public sector participants. This contrasts strikingly with the other categories, which remain more in one sphere. In general, a combination of diverging and similar organizations was suggested as the optimum constellation for this category. The urge to connect, combined with the uncomplicatedness and the mixed combination of private and public participants, may explain the forum’s popularity: 8 out of the 23 studied integrity partnerships are in this category.

Mutual trust is an important prerequisite for a fruitful exchange of information in groups. In small forums, the participants mostly know each other, and thus feel free to be open and trustful. This can be difficult in larger, more anonymous forums. Explicitly addressing this aspect is crucial. As one interviewee explained: “Clear agreements have to be made with each other and one has to be very alert. If a case is discussed in detail, you must be sure that it will stay within the group.” Another downside for larger forums is that the degree of involvement tends to decrease. In these cases, participants are more likely to “lean back” or drop out.

#### 4.4.3.4 Integrity Megaphone (*Sharing Influence*)

Integrity megaphones generally arise after integrity scandals, with subsequent legal and reputational consequences. Incidents in the Dutch building and real estate sectors have led to collective action in these sectors to redress such challenges. Megaphones are a collective response to these threats: “At a given moment, you find yourself cornered, and everything is placed under a magnifying glass, something that naturally bothers us,” one interviewee commented. A joint approach is necessary since a visible lack of integrity in one organization can reflect negatively upon the rest. For example, one of the interviewees noted that “If some scandal or another erupts again, and it turns out that they are members ... then that’s a risk: it would affect all of us.” This explains why the megaphone scores rather high on dependency; it represents all its members and adopts collective viewpoints and obligatory measures.

Megaphones try to influence (existing or upcoming) integrity legislation. This is a unique feature of the category: “We have written a letter to the state secretary about it: This is what we want, this is what worries us about legislation. Then you see that when you sit down with all parties, you contribute more, you carry more weight,” as one interviewee stated. The megaphone thus attempts to tailor regulations to the needs of the sector: “I’d therefore like the government to listen to what our sector can and cannot do, and then work together, instead of them once again coming up with irrational demands,” the same interviewee emphasized.

Megaphones also attempt to increase harmony and to motivate their members to take an extra step. A joint approach generates peer pressure; if several parties are in favor of additional integrity activities, then it is difficult for others to stay behind. However, at the same time, colleagues who get overzealous can be slowed down, because they may make the rest of the sector look bad.

Other measures to manage integrity and restore the reputation of a sector are the screening of new members, the development of a joint ethical code, the implementation of a central hotline to report integrity complaints, and a register of employees who have committed integrity breaches. This can ensure that someone who has been fired because of fraud in one organization will not be rehired by another organization. Members are required to adopt such measures, and in return they get a certificate. For individual organizations, the certificate is important, and it makes organizations feel more obligated to participate. As one of the interviewees stated: “The label of ‘that surely is a decent professional organization’ is, to put it bluntly, very important to a great number of members.”

It is worth mentioning that most of the six megaphones in this study operate in the private sector. Competition between participants has some influence on cooperation. First, they have to avoid the impression of illicit cooperation, and second, they have to prevent that sensitive market information will be shared. Nevertheless, the extent of competition is not rated very high by the participants, nor is it considered a problem for taking joint integrity measures.

## 4.5 Discussion

The central question in this study was how organizations can cooperate with other organizations to improve their integrity management. The research provides first insights into the variety of integrity partnerships based on a systematic analysis of empirical data. It also complements the existing body of knowledge on integrity management that centers on the internal activities employed by organizations to manage integrity. Last, it points out what possibilities organizations have to manage integrity with the support of external partners.

The study mapped the different forms of integrity partnerships and their characteristics, identifying the benefits and points of concern for each category. The main differences between the four categories proved to be related to the different objectives they pursue. Organizations jointly develop and share integrity instruments if they lack the means and knowledge to comply with external integrity provisions (integrity workshop). When they are short of internal capacity to permanently perform certain specific integrity tasks, like conducting investigations, they exchange this capacity with others (integrity pool). Integrity officers who feel isolated in their own organizations organize external opportunities to exchange experiences (integrity forum). Finally, when organizations want to improve their collective reputation or to influence external integrity regulations, they join forces (integrity megaphone).

Although the four integrity partnership categories have different objectives, these are all related to some kind of pressure, such as (new) integrity legislation, integrity breaches, reputation damage, or a lack of internal means and professional backup. The organizational characteristics of each category differ as well, as summarized in Table 3.

**Table 3:** Integrity Partnership Organizational Characteristics

Organizational characteristics	Level of formality, dependency, and binding agreements	
	Low	High
Sector: public Organizational similarity: high Number of participants: low	Integrity Workshop I	Integrity Pool II
Sector: public, private, mixed Organizational diversity: high Number of participants: high	Integrity Forum III	Integrity Megaphone IV

The research demonstrates that workshop and pool integrity partnerships typically occur in the public sector, since partnerships of these types require members with a larger degree of organizational similarity. The number of participants in the workshop and pool categories is limited because of the complexity of developing instruments and exchanging capacity between organizations. There seems to be a natural limit to the number of organizations that can be involved in these activities. The number of participants in quadrants III and IV of the table are generally larger because exchanging experiences and effectively exerting influence requires more participants. Organizational diversity is

also higher, and there is sometimes a mix of public and private organizations. Such a mix increases the possibility of gathering new insights. In the case of the megaphone, the diversity is explained by the fact that different organizations that belong to a given industrial chain sometimes have to cooperate in order to protect the interests of the entire chain. One weak link in the chain can cause trouble for the others. Reputation damage, increased oversight, or even new integrity legislation could be prevented (or influenced) by close cooperation.

The research findings on the aspect of organizational similarity and diversity correspond only partly with Van der Krogt and Vroom (1989), who argue that cooperation is smoothed by similarities, but hampered by diversity and competition. Our findings demonstrate that likenesses do indeed facilitate cooperation. This is certainly the case in the pool and workshop integrity partnerships. These partnerships exist in the public sphere, so there is no commercial competition between the member organizations. However, the findings also indicate that in some integrity partnerships, the organizations must differ sufficiently in order to be able to learn from each other. This is particularly the case in forum integrity partnerships that include public and private partners. Competition is not reported to be an issue in the forum, however, since integrity professionals primarily exchange experiences to increase their own professionalism. Of all the integrity partnerships, the risk of competition between partners is highest in the megaphone. In this category, rival private organizations (e.g., banks) cooperate. Although interviewees from megaphone partnerships reported being aware of the potential risks of market distortion, unauthorized price agreements, cartel forming, and violation of competition rules, this did not obstruct cooperation in the area of integrity management. The mutual gain and necessity of collective activity seem to outweigh competitive risks.

The (related) levels of formality, dependency, and binding agreements are another distinction that can be made between the categories. Workshop and forum integrity partnerships score lower on these aspects than their counterparts in quadrants II and IV. Developing instruments is characterized by a rather creative, loose, and informal process. Organizations retain their autonomy and there are no agreements about the implementation of the developed integrity instruments. The forum is the least formal and binding form of cooperation; participants meet simply to exchange experiences and enhance their own professionalism. Exchanging capacity (pool), on the other hand, is regulated by formal binding contracts, which creates more interdependency. Striving for uniformity and conformity (megaphone) and acting as a collective entity toward legislators or oversight bodies, also binds partners to agreed positions and standards.

These three aspects relate to both institutional theory and cultural theory. Organizations work together on integrity programs or enter into partnerships with organizations in their sector they deem successful. This was the case, for instance, in the cooperation between a large municipality with a well-functioning integrity office and a much smaller neighboring municipality. Institutional theory also points out that parties organize themselves to act as mechanism to coordinate conformity or jointly influence external

demands and expectations. Integrity partnerships in the fourth category seemed to be strongly focused on this. Pressure plays a role in all integrity partnerships. However, in the case of forum partnerships, the pressure is oriented more internally than externally (due to a lack of sparring partners within the organization). From the perspective of cultural theory, it was noticeable that respondents scored relatively low on the factor of dependence. Autonomy mostly remained intact. However, this occurred to a lesser extent in the case of the megaphone and the pool because of representational ambitions and binding contracts.

A final observation addresses the respondents' positive evaluations of the integrity partnerships. This is encouraging, because it implies that integrity partnerships seem to work, and that organizations do not (have to) stand alone in the endeavor to promote and manage integrity. Some caution, however, is needed with the interpretation of such evaluations. Can we be sure that the respondents are expressing their true feelings about the integrity partnerships, or that they are not simply trying to save face? Do they feel free to admit disappointing results despite their "investments" in cooperation, and are they not afraid to diverge from their partners? Because of the guarantee of anonymity, and also because the respondents demonstrated that they were comfortable in addressing their concerns, the positive evaluation seems to be realistic. A positive evaluation of integrity partnerships is certainly not self-evident in view of recent critical reports about other forms of interorganizational cooperation (Aardema, 2010; Boogers, 2013; De Boer, 2014; De Man et al., 2014). The fact that organizations join integrity partnerships with a clear and tangible goal rather than just following the popular cooperation trend may be a possible explanation for their success.

#### ***4.5.1 Follow-up research***

The study calls for follow-up research in a number of areas. A first question is whether integrity partnerships are also found elsewhere, or whether they are typically a feature of Dutch governance. Is their existence related to a country's development or to issues in the area of integrity management? Are all such partnerships identical to the four categories found in this study, or do different forms exist? These kinds of contextual questions are worth examining and important for an understanding of this phenomenon.

This study serves as a step toward further research into integrity partnerships. The first assessment is positive: Respondents appear to be satisfied with the integrity partnerships. Reported benefits, such as exchange of knowledge, increased efficiency and quality in the area of integrity management, and counteracting the isolated position of integrity officers, clearly confirm that integrity partnerships are useful, as suggested in the literature. However, a second area that needs further inquiry is how to optimize the effectiveness of integrity partnerships. Reported issues such as free-rider behavior, feelings of frustration between partners, a lack of openness and involvement, and the problem of finding the right partners, need to be addressed. Another way to increase effectiveness is to examine how integrity partnerships relate to the existing body of

knowledge about integrity management. In other words, (how) can intraorganizational and interorganizational perspectives on integrity management be brought together in order to achieve a productive interplay?

A third follow-up question is whether integrity partnerships in the public and private sectors differ. At first glance, the workshop and the pool are found among public organizations, while the megaphone is largely associated with private organizations. Reasons for the former could be that public organizations are more alike than private organizations, which enables more extensive cooperation between government institutions. Reasons for the latter could be that private organizations are more susceptible to negative media attention and to fear of a tarnished reputation (or even prosecution) than government organizations. Consequently, the need to address negative media attention is stronger in the private sector. This also offers avenues for follow-up research.

#### ***4.5.2 Practical and policy considerations***

The research results suggest that an interorganizational integrity management approach offers certain advantages. The positive experiences imply that organizations could benefit from integrity partnerships. This study therefore provides an incentive for organizations to consider joining existing integrity partnerships or establishing new ones. The problems they will likely encounter can be taken into account beforehand by studying the concerns revealed in Table 2. In this way, the study offers practical pointers that can be of use to organizations.

Regulators, policymakers, supervisory bodies, sectoral organizations, and national authorities can also benefit from this study. All of these actors can stimulate the creation of integrity partnerships, using them as a steering instrument to improve integrity management within the public and private sectors. Integrity partnerships can facilitate the implementation of legislation and enhance rule compliance, but they can also be used to enable a dialogue between individual organizations and their higher (or supervisory) authorities. They could trigger front-runners in integrity management to help those who are lagging behind. They could also provide an overview of existing integrity partnerships by sector in order to increase their visibility. Certainly, in times of austerity and budgetary cutbacks, the efficiency advantages that could be realized by integrity partnerships are worthy of consideration. Besides stressing the undiminished importance of adequate integrity management in “hard times,” national authorities could point out that organizations do not have to be on their own in this endeavor: Integrity management is not necessarily “the wheel” that organizations have to reinvent and keep moving on their own.

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**Appendix 1:** Scores on the closed-ended interview questions

<b>Statements</b>	<b>I Workshop</b>	<b>II Pool</b>	<b>III Forum</b>	<b>IV Megaphone</b>	<b>Average</b>	<b>Difference</b>
General appreciation	7.5	7.4	7.6	7.3	7.5	0.3
Increases internal support	4.2	4.0	3.9	4.0	4.0	0.3
Extent of autonomy	3.8	4.2	3.8	3.8	3.9	0.4
Learn from each other	4.2	4.6	4.2	4.5	4.4	0.4
Similarities ease cooperation	4.0	4.4	3.8	4.4	4.2	0.6
Feeling less alone	4.2	4.4	4.6	3.9	4.3	0.7
Increases sectoral harmony	3.7	3.6	3.4	4.1	3.7	0.7
Extent of hierarchy	2.0	2.0	1.1	1.5	1.7	0.9
Increases efficiency	4.2	5.0	4.2	4.1	4.4	0.9
Urged to participate by peers	2.0	1.0	1.0	1.9	1.5	1.0
Rule compliance	4.2	4.4	3.4	4.5	4.1	1.1
Feel obligated to participate	1.3	1.6	1.2	2.3	1.6	1.1
Avoiding frontrunners	1.3	1.6	1.2	2.3	1.6	1.1
Exchanging experiences	3.8	4.6	5.0	4.4	4.5	1.2
Intensity of cooperation	4.3	4.0	2.9	3.3	3.6	1.4
We want to do less ourselves	3.7	3.4	2.2	3.0	3.1	1.5
External pressure	4.5	2.6	2.8	3.9	3.5	1.9
Competition is of influence	1.0	1.0	2.5	2.9	1.9	1.9
Avoid parties lagging behind	4.2	4.0	2.3	3.9	3.6	1.9
Extent of dependency	1.8	3.2	1.2	2.8	2.0	2.0
Activities are compulsory	2.3	3.2	1.2	3.4	2.5	2.2
Extent of formalization	2.5	4.4	2.0	2.6	2.9	2.4
Influencing legislation	3.0	2.6	1.7	4.3	2.9	2.6

Note: The Appendix provides an overview of the scores on the closed-ended interview questions. Only the first (appreciation) question is scaled from 1-10 (low-high), the rest are scaled from 1-5 (low-high).



The background features a dark blue field filled with various sizes of semi-transparent gears. Overlaid on this are several bright yellow geometric shapes, including triangles and trapezoids, which create a dynamic, modern aesthetic.

# PART 3.

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TWO THEORY-BASED INTEGRITY  
MANAGEMENT FRAMEWORKS



The background features a large, semi-transparent number '5' on the right side. The entire page is overlaid with a pattern of interlocking gears of various sizes and orientations, rendered in a light gray, semi-transparent style. The gears are scattered across the page, with some appearing more prominent than others.

# **CHAPTER 5.**

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**CONTENT AND DESIGN OF INTEGRITY SYSTEMS**

## Abstract

Public integrity is crucial, especially for local government organizations. Although research points out that a systematic integrity approach is to be preferred, only limited knowledge is available about what such an approach should entail. This chapter presents a framework that contains seven theory-based elements constituting a complete integrity system. This framework is used to assess the integrity systems in three large European cities, to detect shortcomings of these systems, and to provide recommendations for both administrative practice and future research. Based on the research findings the studied cities are, for instance, recommended: to improve their long-term awareness and support for organizational integrity; to work with a clearer definition of (and vision on) integrity (management); and to reflect more critical on their integrity system based on thorough policy analysis and evaluations.<sup>4</sup>

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4 This chapter is previously published as: Hoekstra, A., Huberts, L., & Van Montfort, A. (2022): Content and Design of Integrity Systems: Evaluating Integrity Systems in Local Government, *Public Integrity*, DOI:10.1080/10999922.2021.2014204



## 5.1 Introduction

Nowadays, the importance of public integrity is widely recognized. The various definitions given in both literature and practice of the concept of 'public integrity' have as a common feature that the emphasis is placed on the moral quality of the actions of public institutions and their officials (Huberts et al., 2014). Public integrity refers to how public policies are decided on and implemented, whether the due processes and procedures are followed, and thus to how the results are achieved (Huberts, 2018). It is a crucial aspect of "good governance" (Huberts et al., 2014) and contributes to: the enhancement of public trust (Lewis & Gilman, 2012); the reinforcement of the constitutional state (Cowell et al., 2011); the improvement of economic growth, social stability, and service delivery (Bossaert & Demmke, 2005); and the effectiveness of government activities (Maesschalck & Bertok, 2009). Public integrity presumably even contributes to the happiness of citizens (Veenhoven, 2018).

Moreover, as civil servants -certainly at the local level- operate in a "fishbowl," integrity violations (like fraud, corruption, theft and other forms of misconduct) are likely to be discovered and exposed by the media, often leading to public outrage, law suits, and diminishing trust in the public sector (Hoekstra & Heres, 2016). For cities and municipalities, it is all the more crucial to pay attention to integrity since local government organizations are accountable for large public expenditure in service provision areas that are often known for their vulnerability to integrity violations (Six & Huberts, 2008). Furthermore, local integrity risks are increased by the trend to decentralize public powers and responsibilities from the national to the local level, and by the intense contact with citizens at the local level, where officials may have greater vested interests based on social ties that can influence public decision making (Transparency International Nederland, 2021). Local government organizations are therefore forced to think about how to address these vulnerabilities and risks and to prevent integrity violations (Huberts & Van Montfort, 2020, 2021).

Since integrity violations are mostly explained by multiple and mutual reinforcing causes (Hoekstra & Heres, 2016; Kaptein, 1998; Kish-Gephart et al., 2010) scholars acknowledge that safeguarding integrity requires a diverse set of integrity measures and activities (Huberts et al., 2014). The literature also points out that these measures and activities should not be implemented in a stand-alone manner, but that enhancing integrity is served by a much more integrated and systematic approach (Hoekstra & Kaptein, 2020; Huberts & Van Montfort, 2020; Maesschalck & Bertok, 2009; Six & Lawton, 2010; Van Montfort et al., 2018). However, there is only limited knowledge of what a coherent and systematic integrity approach to government organizations should entail (Huberts & Van Montfort, 2020, 2021). To gain a better understanding on this matter a research project on municipal integrity systems was conducted recently (Hoekstra et al., 2021). The project was centred on integrity systems designed for civil servants. Measures and provisions aimed to support the integrity of appointed or elected public office holders, such as aldermen and city councilors, are not taken into account. Compared to civil servants' integrity, political integrity is quite a different theme, characterized by other types of

integrity violations, and involving other responsibilities, instruments and sanctions (Van der Wal, 2018).

To gain a better understanding of the theoretical and empirical content and design of (local) integrity systems this article presents the most important findings regarding three questions: (1) what are the constituting elements of an assessment framework for local integrity systems according to the literature, (2) what shortcomings in local integrity systems can be identified by applying this assessment framework systematically, and (3) what practical recommendations can be made based on this systematic assessment?

## **5.2 Theory: Constituting Elements of an Integrity System Assessment Framework**

Most studies on organizational integrity focus on individual measures and activities that can be used to promote integrity (Hoekstra & Kaptein, 2020; Huberts & Van Montfort, 2020). Among the many examples belong contributions on ethical leadership (Dobel, 2018; Heres et al., 2014; Lasthuizen, 2008), ethics and dilemma training (Svara, 2007; Van Montfort et al., 2013; Warren et al., 2014), codes of conduct (Kaptein & Schwartz, 2008), whistleblowing (De Graaf, 2010), and confidential advisors (De Graaf, 2019; Hoekstra & Talsma, 2021). At the same time there is growing awareness that a more inclusive and integrated “integrity system” approach, in which all of the integrity measures and activities are combined and (inter)connected, is to be preferred (Hoekstra & Kaptein, 2020; Huberts & Van Montfort, 2020 and 2021; Maesschalck & Bertok, 2009; Six & Lawton, 2010; Van Montfort et al., 2018). Scientific literature indicates that the effectiveness of integrity measures and activities depends on the working and credibility of the overall system (De Graaf & Macaulay, 2014; Macaulay et al., 2014; Six et al., 2012; Slingerland et al., 2012; Van den Heuvel et al., 2017).

A complete integrity system comprises a number of specific elements. Research on anti-corruption strategies and institutions (De Sousa & Quah, 2010), national integrity systems (Pope, 2000; Slingerland et al., 2012), local integrity systems (Huberts et al., 2008), ethics and integrity management (Anechiarico, 2017; Graycar & Smith, 2011; Jurkiewicz, 2020; Kaptein, 1999; Maesschalck & Bertok, 2009; Menzel, 2016; Paine, 1994; Svara, 2007), and on specific integrity measures has resulted in a set of key elements (Table 1). This set has been applied, evaluated, and adapted over time (Van den Heuvel et al., 2017) and has been used for assessing the quality, i.e., the completeness, of the local integrity systems for civil servants in the three cities involved in this current research. The assessment framework is theory-based and is within the context of this current article not up for debate, but provides the answer to the first research question: what are the constituting elements of an assessment framework for local integrity systems according to the literature.

## 5.3 Methodology: Case-studies in Munich, Antwerp, and Amsterdam

This article is grounded on a research project issued by the Dutch House of Representatives (Hoekstra et al., 2021). The research project followed a qualitative, socially constructive approach (Creswell, 2013, p. 24) based on case-studies conducted in Munich, Antwerp and Amsterdam. The selection of these three cities was inspired by a previous international comparative study on the integrity systems of seven large cities (Huberts et al., 2008) and by information obtained from the German and Flemish experts we consulted. A most-similar case study design has been strived for by selecting cities which are similar in relevant respects and therefore form a fairly homogeneous research group. All three examined cities are large in size, have an international character, and have the reputation to belong to the national “frontrunners” if it comes to integrity management. The research results are however not only relevant for this category of cities. The shortcomings found with regard to the quality or completeness of local integrity systems will probably be present to a greater extent in small municipalities that do not have an international character due to their less extensive resources, and in municipalities that are not known frontrunners in the field of promoting integrity (see also: Transparency International Nederland, 2021; Schöberlein, 2019).

5

**Table 1:** Assessment Framework for Local Integrity Systems for Civil Servants

1.	Attention 	<i>Integrity on the agenda:</i> integrity gets permanent attention, is regularly discussed within all layers and sections of the organization, and the integrity system is provided with sufficient resources.
2.	Clarity 	<i>Integrity defined:</i> the concept of integrity and the vision on integrity policies and strategies are clearly defined, formulated, and operationalized in a coherent way.
3.	Leadership 	<i>Integrity managed:</i> managers set the good example, show exemplary (ethical) behavior, are open to employees' integrity concerns, and support and enforce the organization's integrity policies.
4.	Balance 	<i>Integrity in balance:</i> attention is paid to a well-balanced and coherent integrity strategy that is both value-oriented (training, internalization, and moral awareness) as well as rule-oriented (rules, supervision, and sanctions).
5.	Policies 	<i>Integrity policies and measures:</i> the organization has specific integrity policies and measures in place, such as: code(s) of conduct, integrity regulations (for instance on gifts, side jobs, procurement, etc.), personnel integrity policies and training programs, internal procedures for reporting integrity violations, investigation procedures, central registration formats for administering integrity violations, and integrity risk analyses tools.
6.	Organization 	<i>Integrity institutionalized:</i> the organization establishes an integrity office/commission, or appoints (central/decentral) integrity officers to coordinate the efforts of the various internal integrity actors from a systemic point of view.
7.	Reflection 	<i>Integrity monitored:</i> critical reflection takes place on a regular base, including periodical monitoring and evaluation of integrity policies and measures in terms of implementation, effectiveness, and required adjustments and improvements.

The “within-case” analysis of each of these city administrations was followed by a “cross-case” analysis (Creswell, 2013, p. 101). Both types of case analysis used the framework outlined above in Table 1. Several research methods and sources were combined in the three case-studies. The analysis of the cities’ institutional contexts was mainly based on policy documents and research literature. A combination of both desk-research and interviews was used to assess the local integrity systems with the help of the framework. In every city a contact person was appointed who provided the researchers with the available policy documents and who helped them to make a selection of the most relevant interview candidates. In total 18 interviews were conducted in the period September–November 2020. Because of Covid-19 travel restrictions all interviews had to be conducted by phone or by video conferences. In addition to respondents that were involved in local integrity system internally, policy experts on the national level and representatives from municipal associations were interviewed as well. The interview results were processed anonymously in order to increase the respondents’ feelings of confidence and safety. The on the interviews based concept versions of the cities’ integrity assessments were verified by the contact persons on factual inaccuracies and omissions.

## **5.4 Research findings**

In this section the main research findings are presented. Prior to the results of the evaluation of the three local integrity systems some relevant differences in the institutional contexts of the three studied cities are described first. This creates a better understanding of the cities’ situations and challenges in the field of integrity management.

### ***5.4.1 Institutional contexts in Germany, Belgium, and The Netherlands***

The federal and regional authorities in Germany and Belgium hardly play a role with regard to local integrity policies. As central control is limited, German and Flemish municipalities are predominantly free to implement integrity policies as they see fit. In the Netherlands, however, the national Civil Servants Act contains a detailed set of integrity measures for Dutch government organizations (including municipalities). The Dutch Ministry of the Interior and Kingdom Relations is responsible for the content and design of these measures, for encouraging and supporting government organizations to implement these measures, for monitoring the implementation of these measures, and for intervening in government organizations in case of long-term, structural, integrity problems (Hagedoorn & Hermus, 2016; Hoekstra & Kaptein, 2014; Lamboo & Hoekstra, 2016). As such it appears that Dutch local government organizations experience stronger national guidance and control than government bodies in neighboring countries.

What stands out secondly, is the difference in the terminology used in the three countries. In the German administrative context, the term “integrity” is hardly used. Instead, the terms “anticorruption” and “compliance” are common. Both terms are expressions of the rule-oriented approach, which is dominant within German government (Von Maravic & Schröter, 2008). In the Flemish administration, the term “integrity” has become more

established over time, while in the Netherlands “integrity” is a common and widely accepted term since the early 1990s and often defined there as acting in accordance with the relevant moral values, norms, and rules (Huberts et al., 2014).

Thirdly, the presence of existing research material on local integrity appears to vary considerably among the three countries. German research publications on local integrity policies were virtually absent until recently. The limited number of studies indicate that German local integrity policies are neither theoretically nor empirically founded and often incoherent (Meyer & Frevel, 2017). Moreover, the implementation of integrity policies is weak (Stark, 2019; Trunk & Hiller, 2017) and smaller municipalities in particular are barely active in this field (Meyer, 2017). In Flanders, there is a similar lack of research interest. Existing research in this field predominantly focusses on the city of Antwerp (Lambrechts, 2012; Loyens & Maesschalck, 2008; Vandeplas & Brëens, 2008). Although the Flemish local integrity policies are currently still at an early stage, attention has increased in recent years. The obligation in the municipal decree to draw up a deontological code, but also recommendations from Audit Flanders based on general audits and forensic investigations certainly triggered this attention. The formalization of integrity policies remains, however, limited in most municipalities (Demaerschmalck, 2020). Compared to Germany and Flanders, Dutch research into local integrity has a much richer tradition. In addition to studies that focused on the integrity system of the city of Amsterdam (Huberts et al., 2008; Huberts & Six, 2012), the integrity systems of many other Dutch cities and municipalities have been investigated as well (Heres et al., 2014; Hoekstra & Kaptein, 2014; Van den Heuvel et al., 2017; Van Montfort et al., 2018). The integrity monitor, conducted every four years by the Dutch Ministry of the Interior and Kingdom Relations, is another important source of information for the state of affairs on the implementation and perception of (local) governmental integrity policies (Lamboog & Hoekstra, 2016).

#### ***5.4.2 Applying the integrity system assessment framework; identifying shortcomings in local integrity systems in Munich, Antwerp, and Amsterdam***

In this section, the prevalence of the seven system elements within the city administrations of Munich, Antwerp, and Amsterdam is described per element. This gives a rather comprehensive picture of the quality, i.e., completeness, of the local integrity systems and the main similarities and differences. Especially the considerable differences in the cities’ organizational integrity arrangements (element six) are noticeable. This section answers the second research question: what shortcomings in local integrity systems can be identified by applying this assessment framework systematically?

##### ***Element 1: Attention***

It is striking that integrity was primarily put on the political and administrative agenda in each of the three cities following significant integrity violations. Violations generate attention and are almost always the reason to initiate or intensify local integrity policies. That attention, however, often gradually subsides until another incident occurs. As

such the attention to integrity can be qualified as incident-driven. Especially political public office holders, like city counsellors and aldermen, are prone to react on integrity violations instead of showing a more proactive interest in this topic. Political support is mainly expressed in terms of the resources that are made available for the integrity system, with little interest for the content and design, the effectiveness, and the necessary improvements of these systems.

### *Element 2: Clarity*

In all three cities, the integrity concept is not clearly defined. In the Munich city administration, the word integrity is not even used. Although separate integrity related policies and measures (like anti-corruption, bullying, harassment, intimidation, and discrimination) are in place, they are not labelled and organized as a coherent set of integrity measures, let alone as an integrity system. Despite the specific integrity policies and systems, the cities of Antwerp and Amsterdam have in place, these administrations still lack a clear integrity vision and plan defining the goals, strategies, measures, and the responsibilities of the involved integrity actors.

### *Element 3: Leadership*

Respondents in the three cities indicated that integrity is not a standard concern for every manager and that there is room to improve ethical leadership. Managers sometimes find it difficult to discuss integrity in a positive and appropriate way. It is important that managers are supported in this, as this increases the confidence of employees to discuss integrity issues with their supervisors. In each of the three cities, specific programs and courses are available to educate managers in this regard, but these are only compulsory in Munich. Despite the room for improvement the interviews also indicate that integrity issues (certainly the serious ones) are dealt with by managers and that there is no permissive culture.

### *Element 4: Balance*

Each of the cities has measures in place that are in line with a rule-oriented approach (e.g., rules, procedures, supervision, and enforcement) and a value-oriented approach (e.g., training, awareness raising, internalization, and moral judgment). In terms of balance between the two approaches, it is striking that the emphasis on these approaches changes over time. After serious incidents, stricter rules, controls, and sanctions are usually effectuated, while in more “quiet” times integrity training and awareness raising sessions gain popularity.

### *Element 5: Policies*

All three cities have the more or less “usual” set of integrity policies and measures in place. These include, for example, rules and procedures relating to confidential information, declarations, the acceptance of gifts and invitations, ancillary positions (side jobs), public procurement, the division of specific tasks, and the rotation of certain jobs. A difference

between Munich on the one hand, and Antwerp and Amsterdam on the other, is that the first does not have a central code of conduct. Instead, Munich's guiding civil service values and standards are described in various documents. The HR related integrity measures like adequate selection processes, swearing-in ceremonies, introductory courses for new employees, staff interviews, and personnel assessments are also paid attention to in the studied administrations. Although in Munich a specific integrity training programs does not exist, employees are certainly made aware of integrity-related themes. Furthermore, it appears that in Munich such training and awareness activities are more focused on managers than on individual employees. In Antwerp and Amsterdam, integrity training programs are offered to employees. Next to explaining the integrity policies, rules, and codes in these training sessions the civil servants are also trained in solving ethical dilemmas.

In each of the three cities, internal contact persons are available to advise employees on integrity (related) issues or to report (suspicions) of integrity (related) violations. Within the Munich administration, employees can turn to the "Personalrat" (the German equivalent of the Works Council) which has a much broader, and therefore less specialized, scope than the confidential integrity counselors appointed in Antwerp and Amsterdam who are specialized in dealing with unwanted behavior on the work floor and with other integrity violations. Although the internal communication about (suspicions of) integrity violations could be used to affirm the organization's integrity standards and to signal out that management firmly responds to such violations, the three administrations are reluctant to do so. Respondents declare that privacy concerns hold organizations back from communicating internally about integrity issues in individual cases. Unlike in Munich and Antwerp, in Amsterdam notifications of suspicions of integrity violations and the results of the investigations following these notifications are centrally recorded by the Integrity Office and published anonymously in annual reports of this office. Although risk analyses are performed in each of the three cities, there are differences as to how this is done. In Munich, risk analyses are carried out in some units to identify activities that are sensitive to corruption. In Antwerp, integrity risks are analyzed as part of general organizational audits that also cover a range of other (non-integrity related) topics. Only the (Integrity Office of the) city of Amsterdam performs risk analyses specifically focused on integrity risks and vulnerabilities.

### *Element 6: Organization*

The three cities differ considerably in terms of their organizational arrangements for promoting integrity. Strictly speaking, the Munich administration lacks an integrity system. An integrity system as a coherent collection of measures, activities, and functions to promote and maintain organizational integrity is simply non-existent in Munich (just as in other German administrations). However, various departments and officials pay attention to certain integrity related topics. To detect, address, and prevent corruption Munich, for instance, established a central anticorruption unit and appointed decentral anti-corruption officers. Furthermore, the internal Audit department can monitor and

investigate internal procedures with regard to, for instance, data protection, ancillary activities, public procurement, and contracts. The HR department is another key-actor and is focused, among other things, on the rule compliant behavior of civil servants and provides advise on the disciplinary consequences of wrongdoings. Moreover, a variety of contact and reporting points are established for (integrity related) themes like equal treatment, intimidation, harassment, bullying, discrimination, and psychological wellbeing. As all the described actors are responsible for specific themes and because an overall and coherent integrity approach is lacking, Munich's integrity system should be qualified as fragmented.

Antwerp has an independent, mainly advisory, integrity commission composed of internal and external (parttime) members. This commission convenes once a month and provides advise on, for instance, the contents of the code of ethics, the handling of integrity violations, and the enhancement of integrity awareness within the organization. Next to the commission several other actors are involved in the Antwerp integrity system, among whom three key-players can be distinguished. The city director is the ultimate responsible actor for the integrity system and plays an important role to create attention for integrity within the organization. The HR department provides integrity training programs, appoints integrity councilors, and enforces penalties for integrity violations. The (internal) Audit department can investigate possible integrity violations. The commission coordinates the various integrity actions and actors, but only to a certain extend and in an informal way. All in all, Antwerp has chosen for a rather informal and low-key integrity approach that rejects bureaucracy, formalization, and strictness.

The Amsterdam Integrity Office plays a central and coordinating role within the city's integrity system. The office employs 23, full-time, integrity specialists in 2021. The tasks of the office include: serving as a reporting point for (suspected) integrity violations, conducting investigations into (suspected) integrity violations, performing integrity risk analyzes, providing training and advice, screening external business partners, and coordinating the work of 46 (decentral operating) confidential counselors who can be consulted by employees in the case of undesirable behavior (like harassment) of colleagues and on other integrity issues. The department directors are responsible for the implementation of the appropriate integrity measures within their organizational units and for entrusting the Integrity Office to conduct integrity investigations. Based on the outcomes of such investigations, the Legal Affairs department advises department directors on the appropriate personal consequences (sanctions) for integrity violators. In conclusion, the Amsterdam integrity system can be characterized as the most formal and coherent one in the three cities.

### *Element 7: Critical reflection*

Formalized integrity plans, but also the periodic monitoring, evaluation, and reflection on these plans are insufficient in each of the administrations studied. This also applies to the reflection on the organizational integrity measures and -system in use. The extent to which the integrity system and/or its components need to be adapted is at most implicitly



assessed on the basis of signals from the organization. None of the administrations utilize thorough in-depth integrity policy analyses and evaluations. This finding is consistent with the results of other current research on this topic (Hoekstra & Zweegers, 2021; Transparency International Nederland, 2021).

## 5.5 Conclusion and Discussion

The assessment results indicate that there are substantial opportunities for improvement. This in itself is not a surprising conclusion since the used assessment framework is based on an ideal system. In the present section, the third question of this article is answered by formulating a number of practical recommendations for both local and national governments. The findings are compared with other research in this field, followed by suggestions for further research.

### 5.5.1 Practical recommendations for local government organizations

The overall effectiveness of an integrity system is determined by the existence, implementation, and interconnectedness of its constituting elements. Based on the present research, recommendations can be formulated for each of these elements. Local government organizations and their political representatives should improve their long-term awareness and support for organizational integrity (element 1). More clarity on the definition of integrity and a better conceived integrity management plan is also recommendable (element 2). Mandatory integrity programs for organizational managers, that are repeated on a regular basis, are suggested to further improve ethical leadership (element 3). Local government organizations are also urged to maintain a balanced integrity approach, consisting of both rules-based and values-based integrity measures and activities (element 4).

Regarding integrity policies (element 5), several recommendations can be made. Integrity codes, -rules, and -procedures can only be effective if they are properly communicated within the organization. The integration of integrity aspects within the recruitment and selection process, the introductory course (for new employees), and in personnel interviews and assessments is also required. Moreover, organizations should provide (regular) integrity training sessions that not only explain the integrity rules employees are bound by, but also teach them how to make moral decisions in ambiguous, dilemma-like, situations. In addition to internal reporting procedures (integrity hotlines), organizations should consider to appoint so-called confidential integrity counsellors to inform employees on how to report (possible) integrity violations adequately. Local governments are also encouraged to communicate integrity violations that have occurred to (re)affirm organizational integrity standards and to signal out that the leadership takes these violations seriously. It is recommended to register notifications of suspicions of integrity violations, and the results of the investigations following these notifications, in a central system. This provides valuable insights into the nature and extent of the integrity problems at issue and makes it possible to target integrity measures and

policies to prevent these problems in the future. For the sake of transparency, it is also recommendable to publish this information publicly in, for instance, annual reports. Detecting (and addressing) integrity risks provides valuable input for the organization's integrity system. Targeted measures can be taken on the basis of these analyzes. Risk analyzes are ideally carried out periodically in all organizational units.

Regarding the organizational integrity arrangements (element 6), it is preferable to implement a systemic integrity design that effectuates coherency between the various integrity elements and that promotes cooperation between the organizational actors which are responsible for those elements. As such, incomprehensible and fragmented integrity initiatives (as is the case in Munich) are less desirable: initiatives related to integrity improvement should be labelled as such, because this increases the visibility of the integrity system within the organization and emphasizes the importance of integrity. Furthermore, a sufficiently formalized and directed integrity approach is to be preferred over an informal and loose approach (as is the case in Antwerp). The former approach contributes to the coherent implementation and continuity of the organizational integrity policies. One last recommendation regarding the organizational integrity arrangements is that a central integrity unit (as is the case in Amsterdam) ideally should be combined with decentral integrity officers in all departments of the local authority. Such an arrangement increases the embeddedness of the integrity system within the entire organization.

The critical reflection on the integrity system (element 7) needs to be improved in each of the three cities. To what extent the integrity system and the individual integrity measures actually work is not based on thorough policy analyzes and evaluations but on implicit, casus-driven signals received from the organization. A more proactive reflection based on monitoring, evaluation, and adaptation is important for the improvement the integrity system.

### ***5.5.2 Practical recommendations for the national level***

The present research also provides recommendations for national governments to improve the quality of local integrity systems. Although these recommendations are initially and foremost related to the Dutch national government, it appears that other countries that want to improve their local integrity systems for civil servants could benefit from the recommendations listed below as well.

Firstly, the research findings show that the concept of integrity needs clarification. In the Netherlands, this concept is defined very broad and refers to both legal and moral qualities, such as playing by the rules and adhering to public values. The downside of such a broad and fluid definition of integrity is that it creates ambiguity (Kerkhoff & Overeem, 2021), which is demonstrated by various integrity investigations in which different investigative bodies came to different judgments on the same integrity issue. As such the national government should initiate a discussion on the content and scope of the concept of integrity.

Secondly, the national government should develop a more coherent national public integrity strategy (GRECO, 2019), should take more responsibility to give direction to local integrity policies, and should make more efforts to encourage the implementation of local integrity policies. In recent years, the Dutch national government seems to have paid less attention to public integrity issues and policies (GRECO, 2019), also with respect to municipal civil servants. Support, and maybe even some pressure, from the national government to keep the integrity focus at the local level alive is recommended.

Thirdly, most Dutch municipalities (especially the small and medium-sized ones) have to rely on expensive private consultancies to investigate integrity violations, as they lack the experience and professionalism to conduct such investigations adequately themselves. These private parties however use different investigative and normative standards (Zouridis & Van der Vorm, 2013), of which the quality is often unclear. As such a national institute like Audit Flanders may be of added value for improving the quality of local integrity policies and systems.

### **5.5.3 Related research**

The recommendations are largely in line with the results of previous studies (Huberts et al., 2008; Van den Heuvel et al., 2017; Van Montfort et al., 2018). These studies on municipal integrity systems also concluded that there is often uncertainty about the meaning of the term “integrity”; that employees are only to a limited extent aware of the existing integrity policies; that there is often insufficient clarity about which actor is responsible for what with regard to managing integrity; and that there is often a lack of an integrated (coherent) strategic vision and approach as the basis for integrity policies. This final point was also made in an explorative study of integrity systems in European local authorities by Transparency International Nederland (2021) and was one of the conclusions of the GRECO (2019) evaluation report of the Netherlands.

### **5.5.4 Suggestions for further research**

The presented framework for assessing the quality of local integrity systems for civil servants is based on earlier versions that have been applied, evaluated and adapted over time. The application of the framework within an international context is however a novelty. The experiences in the current study are positive and indicate that the framework can be used in an international context. This does not come as a surprise as the framework is based on a wide variety of international scholarly sources in the field of ethics and integrity management. The framework should however be used in more countries to further test and verify its applicability. In this regard also the institutional context within other countries requires further attention.

What other aspects than the influence of the national government, insights in pre-existing and comparable research results, and terminological issues turn out to be relevant for the interpretation of the research findings? Another possibility is to integrate the institutional context in the framework by adding it as the (eight) element “institutional alignment”.

Another avenue for further research is related to organizational size. Each of the three studied cities have large administrations and are perceived as frontrunners within their countries. In terms of system completeness, they are not representative for other cities or municipalities, and certainly not for the smaller ones. As smaller organizations have less resources (e.g., budget, time, expertise), it is likely that their integrity systems are not as complete and well equipped. The question of how to manage integrity within smaller organizations seems to be an underresearched area that deserves much more attention.

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The background features a large, light gray number '6' on the right side. The rest of the background is filled with a pattern of interlocking gears of various sizes and orientations, rendered in a light gray, semi-transparent style. The overall aesthetic is clean and technical.

# **CHAPTER 6.**

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## **THE INTEGRITY OF INTEGRITY PROGRAMS**

## Abstract

Most of the norms developed for integrity programs are grounded in positivist arguments focused on effectiveness. The norms developed in this article are grounded in normative arguments that are directly deduced from the concept of integrity itself. The four norms are intentional wholeness; organizational wholeness; societal wholeness; and processual wholeness. These norms are operationalized into sub norms and indicators, resulting in a normative framework that helps to assess and advance the integrity of integrity programs.<sup>5</sup>

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<sup>5</sup> This chapter is previously published as: Hoekstra, A., & Kaptein, M. (2021). The integrity of integrity programs: Toward an evaluative framework. *Public Integrity*, 23:2, 129-141, DOI: 10.1080/10999922.2020.1776077

## 6.1 Introduction

To embed and advance integrity, organizations can design and implement an integrity program. Following Kaptein (2009), an integrity program may be defined as the formal organizational control system designed to create a culture of integrity, to impede integrity violations, and to promote integrity behavior. Integrity programs (hereafter referred to as IPs) may be composed of a variety of measures, such as a code of conduct; an integrity office(r); integrity training; whistleblowing procedures; confidential officers; investigative and corrective policies for misconduct; and pre-employment screening (Ferrel, LeClair, & Ferrel, 1998; Hoekstra & Talsma, 2019; Kaptein, 2015; MacLean, Litzky, & Holderness, 2015; Weber & Wasieleski, 2013). As IPs have become commonplace in both the public and private sectors (De Graaf & Macaulay, 2014; Huberts, 2018; Menzel, 2015), research on their content, use, and quality has expanded considerably.

Research on the quality of IPs is mostly based on a positivist approach that determines the quality of an IP by the extent to which it is effective in practice. For example, Treviño and Weaver (2003) assess the quality of such programs in relation to the improvement of employee behavior, while Kaptein (2009) looks at the improvement of the organizational culture. An advantage of this way of assessing the quality of IPs is that it clarifies their benefit. Furthermore, this approach is evidence-based and thus convincing because it is based on what works and what makes the program effective.

A positivist approach to develop norms for IPs has limitations. This approach requires extensive empirical research because assessing the effectiveness of specific norms is complex (Kaptein, 2015). For example, the effectiveness of codes may be influenced by many factors, each of which difficult to measure, and contingencies have to be filtered out. As such, a decrease in fraud committed by employees would not necessarily be due to the implementation or improvement of the code; it could also be due to changes in the organization's social and economic environment.

Instead of a positivist approach, some scholars have opted for a normative approach to develop norms for IPs. The quality of IPs is then based on the extent to which they satisfy norms that are derived from a concept of what is "good." For instance, Schwartz (2002) grounds the norms for the quality of a code (which is one component of an IP) on a set of universal moral values like respect, caring, and citizenship. Reynolds and Bowie (2004) base their norms on Kantian ethics, and argue, for instance, that employees should be able to follow the program from their own free will. An advantage of this normative approach is that developing the norms for an integrity program would not require extensive empirical research, because the process is based on moral reasoning. However, a disadvantage of this approach is that because it derives the norms from external sources (whether universal values or Kantian moral philosophy), the norms will not be supported unless the relevant source is. To make a stronger case for a normative approach, this article proposes not to derive norms for IPs from external sources but from an internal one; that is, the concept of integrity itself. Faithfulness to the concept of integrity results in more direct and better-fitting norms. Moreover, because an IP by definition stands for integrity, it should therefore inherently possess integrity.

Based on this idea, this article directly deduces integrity norms for IPs from the concept of integrity itself. The word “integrity” originates from the Latin *integritas*, and refers to a state of wholeness, as in being complete, unbroken, united, and entire (e.g., Cox, La Caze, & Levine, 2014; Hartman, Wolfe, & Werhane, 2008; Heywood, Marquette, Peiffer, & Zúñiga, 2017). Wholeness as such can be regarded as an elementary and overarching notion of integrity. This focus on wholeness, as either a direct or indirect notion of integrity, also seems to be dominant in literature reviews on integrity (Montefiore, 1999; Robinson, Cadzow, & Kirby, 2018). From this concept of integrity as wholeness, the following four norms for IPs are deduced: intentional wholeness; organizational wholeness; societal wholeness; and processual wholeness. Each of these norms is operationalized into three subnorms and six indicators, which results in an evaluative framework for assessing and advancing the integrity of IPs.

## 6.2 Distilling Integrity Norms for Integrity Programs

In this section, the four norms and their underlying subnorms are introduced and attributed to IPs. To begin, wholeness implies that something actually is what it seems (and what it is expected) to be. This is wholeness as authenticity: something should be real and right in its core, clear in what it is, and not easily be mistaken for something else. Accordingly, the first norm is intentional wholeness, which means that those who are in charge of the IP (i.e., top management because they bear the final responsibility for organizational integrity) should have pure and intrinsic motivations, and they support the IP in the course of time.

Wholeness also entails internal coherence: the parts match together well and they are organized as an entity. Thus, the second norm is organizational wholeness, which means that the integrity measures of an IP are organized as one, and that the IP is one with the organization. The latter implies that the IP is customized to the specifics of and is integrated in the organization.

Wholeness furthermore entails correspondence with the external context. This implies contextual embeddedness, which ensures that something will make sense and be acceptable for relevant others. Given this, the third norm is societal wholeness, which means that IPs should also reflect the societal moral values concerning organizational integrity. In other words, the wholeness of an IP is not limited to organizational boundaries. Involvement of and communication with society and stakeholders are aspects of societal wholeness.

Finally, wholeness implies the capacity to change, develop, and renew to remain whole in the course of time. This is the reason that wholeness does not refer to a (single) static situation but rather to a (permanent) dynamic process. Consequently, the fourth norm is processual wholeness, which entails the subsequent planning, implementation, and improvement of IPs. As organizational circumstances may constantly change, accomplishing organizational integrity requires that IPs have the capacity to adjust to these changes. The three process phases of an IP (i.e., planning, implementation, and improvement) have to be executed completely and repetitively.

## 6.3 Specifying and Underpinning Integrity Norms for Integrity Programs

This section specifies and underpins the abovementioned norms derived from the concept of integrity. Each norm is operationalized with three sub norms, which, in turn, will have two indicators each. The resulting framework is presented in Table 1.

**Table 1.** Framework for the Integrity of Integrity Programs.

<b>Norms</b>	<b>Subnorms</b>	<b>Indicators</b>
1. Intentional Wholeness	1.1 IP motivation	1.1.1 The IP is adopted by management for reasons of ethical responsibility. 1.1.2 The IP is used by management to stimulate employees' integrity.
	1.2 IP support	1.2.1 The IP is led and supported by management through role-modeling behavior. 1.2.2 The IP receives adequate resources from management to be realizable.
	1.3 IP constancy	1.3.1 The IP is acknowledged by management as a long-term responsibility. 1.3.2 The IP functioning is ensured by management to be resistant to organizational difficulties.
2. Organizational Wholeness	2.1 IP customization	2.1.1 The IP content addresses the organizational integrity risks and dilemmas. 2.1.2 The IP is specifically designed for the organization.
	2.2 IP coherence	2.2.1 The IP measures are complete. 2.2.2 The IP measures are interconnected.
	2.3 IP integration	2.3.1 The IP incorporates the knowledge and experiences of employees. 2.3.2 The IP is paired with adjacent organizational programs and functions.
3. Societal Wholeness	3.1 IP responsiveness	3.1.1 The IP reflects societal moral values, relevant laws, and regulations. 3.1.2 The IP reflects the expectations of external stakeholders.
	3.2 IP cooperation	3.2.1 The IP involves stakeholders in the IP development. 3.2.2 The IP involves stakeholders in the IP implementation.
	3.3 IP accountability	3.3.1 The IP and how it is developed is communicated externally. 3.3.2 The IP results are communicated externally.
4. Processual Wholeness	4.1 IP planning	4.1.1 The IP is based on a plan that consists of clear ambitions and targets. 4.1.2 The IP is based on a plan that describes the implementation and improvement processes.
	4.2 IP implementation	4.2.1 The IP measures are well developed. 4.2.2 The IP measures are well introduced in the organization.
	4.3 IP improvement	4.3.1 The IP is periodically monitored and evaluated. 4.3.2 The IP is regularly adapted.

### 6.3.1 Intentional wholeness

The first norm for IPs is intentional wholeness. This refers to the requirement that top management uses the IP for what it represents, and that the IP is not misused for other purposes. This is in line with Heywood and colleagues (2017), who argue that integrity implies a deliberate motivation to do the “right thing” for the “right reason.” Moreover, integrity entails having pure, dedicated, and sincere intentions (Weber & Wasieleski, 2013). In addition, management should actually support IPs as a long-term responsibility. Given these, three subnorms constitute intentional wholeness, namely, IP motivation, IP support, and IP constancy.

*IP motivation (1.1)* refers to the moral drives and ideals underlying the integrity program and to the fact that the IP is actually used for what it is meant: to support employees' integrity. Firstly, IP motivation necessitates (1.1.1) that the motives for adopting the program are based on certain moral ideals, ambitions, and responsibilities (cf. Weber & Wasieleski, 2013) and thus on the realization of worthwhile, desirable, and moral principles (Brown, 2005; Maak, 2008). In other words, the motive for IP development should at least be intrinsic (i.e., because it is good in itself) and not only extrinsic (i.e., because it is worthwhile for other reasons; for instance, to lower the risks of legal fines or to avert reputational damage). Extrinsic motives are permitted, but an IP that is only motivated by extrinsic motives and lacks intrinsic motives is not morally motivated. Secondly, (1.1.2), IP motivation implies that management should adopt the IP with intention to actually provide guidance for employees' integrity, because employees are the primary object of the IP. This is in line with Valentine and Fleischman (2007), who maintain that IPs should essentially focus on enabling employees to work from a moral standpoint. In short, it can be argued that an IP has integrity when management adopts the IP because of ethical ideals and uses it with the intention to boost and safeguard employees' integrity.

*IP support (1.2)* refers to the unity between management's motivation for the IP and their actual backing of the program, both visibly and materially. IP support can be understood as loyalty to the program by acting according to it. IP support entails, in the first place (1.2.1), management demonstrating role-modeling behavior to show that they lead the integrity program (Kaptein & Wempe, 2002), as well as emphasizing the program's importance. This is crucial: management is at the center of ethical activity, and employees are watching and reading their words, intentions, and actions (Dobel, 2018). IP support also entails the (1.2.2) provision of adequate resources by management for the program to be realizable. Hoekstra and Kaptein (2012) explain that next to adequate budget, ascribed authority, and time, organizations also need to employ experts to run the IP. Without such resources, an IP does not seem to make much sense (Wood, 2002). An annual (earmarked) IP budget may be considered because it would prevent the IP from becoming a residual budgetary item. Moreover, doing so avoids integrity officers' becoming too dependent on the willingness of other departments to contribute financially. This dependence could lead to the unfortunate situation where the IP's content would be determined by what others are willing to finance instead of by what is necessary for the organization. In short, an IP possesses integrity when management is actually committed to lead the IP and provides the necessary resources to run it.

*IP constancy (1.3)* refers to management's unbroken attention for the integrity program. Although many other everyday organizational issues easily tend to overshadow the concern for integrity and integrity management, Kaptein and Wempe (2002) stress that integrity is not a luxury good, and requires constant care and attention. Therefore, IP constancy (1.3.1) requires that management should acknowledge the pursuit of integrity as a long-term responsibility, especially during difficult times, when the stakes are high or when the consequences may be unpleasant (McFall, 1987; Rees & Webber, 2014). Examples of such times are when there is pressure to meet certain targets, when the IP budget is low because of austerity measures and budget cuts, or when the time to

pay attention to integrity is limited because of organizational restructuring (Dobel, 2018; Hoekstra, 2016). Thus, IP constancy also demands (1.3.2) that management should be resistant to organizational difficulties that might impair the integrity program. IPs that are easily suppressed by everyday issues or difficulties are not sustainable. Such IPs may invoke cynicism and distrust regarding management's intentions and commitment, and send the message that integrity is considered less important than is claimed (Brenner, 1992). In short, an IP possesses integrity when management demonstrates a long-term commitment to it, irrespective of organizational difficulties.

### 6.3.2 Organizational wholeness

The second norm for IPs is organizational wholeness, which means that the measures of an IP are organized as one, and that the IP is one with the organization. More specifically, this means that the IP is attuned to the specific organizational conditions and circumstances, that the integrity measures are complete and interconnected, and that the program relates to both employees and other organizational policies. Accordingly, the following three subnorms pertain to organizational wholeness: IP customization, IP coherence, and IP integration.

*IP customization (2.1)* refers to the fit between the specific challenges to organizational integrity and the content of the integrity program. IP customization requires firstly (2.1.1) the identification of the integrity-related risks and dilemmas of the organization, because this is crucial for determining the IP's content. Risk assessment can be used to determine the vulnerable processes of the organizations (Maak, 2008), and dilemma sessions can be used to explore and discuss the integrity-related problems and pitfalls employees may encounter in their day-to-day work (Kaptein, 1999). Secondly, IP customization requires (2.1.2) that the IP should be specifically designed for the concerned organization (cf. Dobel, 1999), instead of being adopted directly from other organizations or copied and pasted from generic blueprints. Pritchett, Woolcock, and Andrews (2010) call these copy-paste practices isomorphic mimicry. Such imitated-IP approaches should be avoided, because the IP being copied may not adequately match, and thus will not be one, with the organization. In short, an IP has integrity when it is specifically designed for the organization, and is attuned to the particular challenges of organizational integrity.

*IP coherence (2.2)* refers to the completeness of the integrity program and the interconnection of its constitutive measures. In the first place, IP coherence entails (2.2.1) the completeness of the integrity program: that is, all the necessary integrity measures are in place. When a crucial measure is missing (e.g., an integrity code or an integrity reporting line), then the IP is less complete, by making it less coherent as a whole and therefore, of lower quality. Within this normative framework, the content of the necessary integrity measures is determined by the requirements of the organization (see 2.1) and by a country's legal framework and requirements (see 3.1). Thus, the specific situation determines what the necessary instruments are. In the second place, IP coherence entails (2.2.2) the interconnectedness of the incorporated integrity measures. This means that the integrity measures should unite and reinforce each other. Coherence among the

different integrity measures can be realized, for instance, by making clear the respective functions of each of the components and by reference between and among the integrity instruments (Hoekstra & Kaptein, 2020). A specific example would be referring to the integrity officer and integrity reporting procedures in an integrity code. The combination of integrity measures is considered to be more than the sum of the individual measures (cf. Brenner, 1992), because the combination creates synergy (MacLean & Behnam, 2010). In short, an IP has integrity when it is complete in terms of incorporated measures and when these measures are coherent.

*IP integration (2.3)* refers to the use of employees' input in the development and design of the IP and to the extent to which the IP is related to other organizational plans, processes, and policies. IP integration (2.3.1) involves the incorporation of employees' knowledge and experience in the integrity program. As members of the organization, employees' input is considered valuable for the IP. IPs that are simply handed down as an order from headquarters lack connection (wholeness) with the workforce (Kaptein & Wempe, 2002; Wood, 2002). However, it may not be practical to involve all employees in this process. A pragmatic solution could be to make a selection of employees; for instance, through the involvement of the work or labor council. IP integration also involves (2.3.2) pairing the program with adjacent organizational programs and functions. Integrity is a multidisciplinary policy area (Huberts, 2014) that is shaped by many different functionaries and departments with different perspectives (Maesschalck & Bertok, 2009; Rossouw & Van Vuuren, 2004). Integration with human resources; finance; legal; communication; security; information technology; and audit policies and programs is recommended (Hoekstra, 2016). A well-integrated IP that is paired with and supported by other organizational policies, programs, and disciplines can be considered whole. To conclude, an IP possesses integrity when it integrates employees' input and when it is paired with adjacent organizational policies and programs.

### **6.3.3 Societal wholeness**

The third norm for IPs is societal wholeness, which means that IPs should reflect (align with) the societal values concerning organizational integrity. As integrity is a social and relational quality that is subject to a wider evaluative community (Brown, 2005; Calhoun, 1995; Reynolds & Bowie, 2004), an organization cannot independently define its own integrity. Instead, organizations should be responsive to the integrity expectations of others. Next to this, two aspects of societal wholeness are the involvement of external stakeholders in the IP and the preparedness of top management to assume public responsibility for the IP. Accordingly, three subnorms substantiate this third criterion: IP responsiveness, IP cooperation, and IP accountability.

*IP responsiveness (3.1)* refers to the fit between the IP and the moral expectations of society in general and of stakeholders in particular. The word "moral" is crucial here, because it excludes immoral or ethically questionable expectations or values. Given this, IP responsiveness necessitates (3.1.1) that the program reflects societal moral values. This includes compliance with relevant laws and sectorial regulations, practices, and standards



(Wulf, 2012). IP responsiveness also involves (3.1.2) consideration of the expectations of the organization's relevant external stakeholders (Maesschalck & Bertok, 2009). Stakeholder analysis is a method that can be used to identify stakeholders and their expectations (Mitchell, Agle, & Wood, 1997). In conclusion, an IP has integrity when it reflects the moral values of society and adheres to the expectations of external stakeholders.

*IP cooperation (3.2)* entails the active involvement of identified external stakeholders in the design and implementation of the integrity program. IP cooperation requires (3.2.1) that stakeholders be involved in the actual development of the integrity program. This involvement contributes to the unity of the IP content with the external expectations, and is often based on what is called "stakeholder dialogue": only in such a socially oriented dialogue can the organization completely fulfill its integrity-management duties. Stakeholder involvement also creates feelings of co-ownership, responsibility, and acceptability. IP cooperation also requires (3.2.2) the involvement of external stakeholders in the implementation of integrity programs. This entails the proper introduction of the IP to stakeholders and their familiarization with the developed integrity measures. For instance, it is crucial for integrity codes that contractors understand the reason that the code is introduced, what it expects of them (e.g., regarding the offering of gifts to employees), and what the consequences are for code violations (e.g., future exclusion from service purchases). To summarize, an IP has integrity when external stakeholders are actively involved in its development and implementation.

*IP accountability (3.3)* entails the preparedness to explain openly and honestly how the organization fosters integrity via its IP and with what results. This is a matter of social responsibility, because the organization is part of a larger community, and thus has to take into account the interests of stakeholders. IP accountability entails (3.3.1) an organization that is communicative (open and transparent) about its developed IP. Regular communication makes an organization's approach to its responsibilities transparent and better understandable. IP accountability also necessitates (3.3.2) the organization's preparedness to communicate about the performance, progress, and failures of its IP. Communications about the IP should not be used as a "selling device" but as an instrument for authentic representation and stakeholder dialogue (Maak, 2008). This also signifies the organization's willingness to improve the IP. To summarize, an IP has integrity when communicated, because this unifies the organization with its external environment.

### **6.3.4 Processual wholeness**

The fourth norm for IPs is processual wholeness, which involves designing IPs as permanent and dynamic processes. As organizational circumstances can change, accomplishing organizational integrity involves the capacity to respond to changes (Cox, La Caze, & Levine, 2003). Therefore, the pursuit of integrity is as a never-ending process (Kaptein, 1998). Processual wholeness entails the repetitive execution of the different process phases that comprise an IP (i.e., planning, implementation, and improvement). This ensures that the IP will be adaptive, and enables the IP to remain whole in the course of time. Below are descriptions of the three process phases as subnorms for IPs.

*IP planning (4.1)* entails ambitions regarding the integrity program to be further specified and amplified into corresponding targets. IP planning is the preparatory phase and sees to the concretization and realization of the program. IP planning is a matter of wholeness, because it connects ambitions to concrete targets and outcomes. Without a clear plan and set targets, integrity activities are destined to remain rather incident-driven (Van Der Wal, Graycar, & Kelly, 2016), prompted by scandals (Heywood, 2012), or impelled by erratic political or financial decisions (Lawton, Rayner, & Lasthuizen, 2013). Thus, as a matter of wholeness, IP planning entails firstly (4.1.1) specifying the program's ambitions and targets in a plan. As Joseph (2002) points out, without a well-considered and well-planned approach, it may be difficult to keep the IP focused. This plan, sometimes referred to as integrity plan (cf. Hoekstra, 2016; Hoekstra & Kaptein, 2012;), is a document that also provides clear direction for the realization of the entire cycle of the IP process. Secondly, IP planning requires (4.1.2) clarity regarding how to carry out the following implementation and improvement phases. An integrity plan is considered a powerful tool—once established, it will prevent deterioration of integrity-related ambitions. In short, an IP has integrity when it is based on clear ambitions and targets and contains a plan for its implementation and improvement.

*IP implementation (4.2)* refers to the actual development and introduction of integrity measures in the organization. Implementation reflects the adage “walk the talk,” as in meet created expectations. When announced IPs are not actually implemented, there is a disconnection between the talk and the walk. Khaled and Gond (2015) calls this organizational hypocrisy. IP implementation entails firstly (4.2.1) the development of integrity measures. Without such measures, the IP is empty and thus not whole. The development sequence may vary, depending on the organization's most pressing needs and eventual budget and time constraints (Kaptein, 2015). IP implementation also implies (4.2.2) that integrity measures are properly introduced and embedded in the organization. This necessitates familiarizing employees with the developed integrity measures. For instance, it is crucial for integrity codes that employees understand the reason that the code is introduced; where it can be found; what it practically prescribes; what sort of behavior it requires; and what the consequences are of violations. Middle management, especially the personnel of which are responsible for introducing and applying the integrity instruments in their respective departments, play an important role in this regard (Kaptein, 1998). Moreover, integrity instruments that are decoupled from the day-to-day work processes may be considered as mere window dressing (MacLean et al., 2015), because they will fail to contribute to the IP. Thus, an IP has integrity when its measures are developed and introduced in the organization.

*IP improvement (4.3)* refers to the periodical analysis and adaptation of the integrity program. IP improvement entails (4.3.1) periodical monitoring and evaluation of the integrity program. This enables the assessment of the implementation process and the extent to which the intended ambitions and objectives are realized. Periodical analysis also enables organizational learning, which is crucial for the adaptation (4.3.2) of the IP (Weber & Wasieleski, 2013). Joseph (2002) points out that as IPs are often developed

in times of crises and thus hastily, they are not likely to suit long-term organizational needs. To remain current, the IP has to evolve and change along with the organization. Updates and revisions ensure that the program demonstrates wholeness with regard to all developments inside and outside the organization. New themes, like the use of social media by individual employees (Hoekstra & Van Dijk, 2016), the #MeToo discussion, and the ethical issues of big data and biased algorithms (Jurkiewicz, 2018), need attention and may require IP adaptation. All these themes provide new input for the planning phase, which makes the process circular and ensures permanent improvement of the IP. The IP is thus ideally a process that evolves based on experience and continuous adjustment (Hoekstra & Kaptein, 2012; Weber & Wasieleski, 2013). In sum, an IP has integrity when it is regularly analyzed and adapted.

## 6.4 Discussion and Implications

In this final section, some issues and implications of the developed framework are discussed. These issues concern the wholeness and misuse of the framework; possible tensions within the framework; how the normative framework relates to effectiveness; and the framework's relevance for the ethics literature.

Concerning the framework's wholeness and misuse; given that integrity stands for wholeness, each of the developed norms is necessary for IP integrity. This implies that to the extent that norms are lacking, the IP is fractioned, its integrity impaired. This is consistent with the notion that integrity is a gradual rather than an absolute construct (Kaptein, 2018). Formulated positively, this means that an IP that meets more of the developed norms scores higher on the wholeness continuum and thereby in integrity. A related question is whether an IP that lacks integrity excuses employees for their own lack of integrity. This is not the case. Although it certainly has to be acknowledged that organizations are responsible for supporting employees' integrity through the development and implementation of IPs, this does not imply that employees are completely released from their own moral responsibility to act with integrity when IPs lack integrity (Constantinescu & Kaptein, 2015).

Tensions may occur within the framework. For instance, an IP should be stable and steadfast (constancy) while open to change and adaptable (improvement). Likewise, an IP should be customized to the organization while responsive to expectations of external stakeholders. Such tensions within an IP are neither inherent nor inevitable. Constancy should not be understood as rigidity or customization as isolation; the particular situation will tell whether there will be tensions between the internal (organizational) and external (societal) requirements of the IP. When one or more of the framework's criteria temporarily cannot be met by an organization, due to tensions among the criteria, we believe that integrity management requires finding a way to reconcile these tensions. Even if reconciliation will not eliminate these tensions, the framework is not undermined, because integrity is something to pursue—even, or maybe especially, when there are tensions or difficulties (Kaptein & Wempe, 2002).

Another issue is how the norms developed in this article relate to the effectiveness criteria dominant in the IP literature. The norms developed in this article are based on a deductive approach, but this does not mean that they cannot (partly) overlap with inductively developed effectiveness criteria. For example, the criterion of IP support is also suggested by Brown, Treviño, and Harrison (2005), based on empirical research. Kaptein (2015) proposes the criterion for coherence based on empirical research on the effectiveness of ethics programs. Treviño and Weaver (2003) suggest the IP implementation criterion based on extensive empirical research. Moreover, based on similar studies, Van Montfort, Ogric, and Huberts (2018) composed an extensive set of effectiveness criteria for integrity systems. This set shows some similarities with the currently proposed normative framework, such as the importance of adequate resources and management support for IPs, accounting for specific integrity risks and dilemmas, and employee involvement in the development of the IPs. However, there are also differences from the currently proposed normative framework, such as the absence of criteria for motivation; constancy; integration with adjacent organizational policies; involvement of external stakeholders; and the planning and improvement of IPs. The overlap with effectiveness criteria does not undermine the normative framework. On the contrary, similar effectiveness-based criteria present additional evidence for the validity of the normative criteria. In this respect, more research is needed to determine if and how effectiveness and normative frameworks can support each other. Further research is also needed on how the developed norms and indicators can be operationalized so they can be empirically assessed in organizations.

A final issue to be discussed is the framework's relevance for the ethics literature. Integrity programs are also often defined as compliance programs or ethics programs (Kaptein, 2015). When used synonymously, the norms for compliance and ethics programs are probably the same as for IPs. However, it should be acknowledged that ethics has a broader scope than integrity (Huberts, 2014), given that organizational ethics also considers issues like ecology, gender, and diversity. Although the developed framework is not designed to be applicable to those aspects of ethics management, future research may determine to what extent the framework may be usable to ethics programs that have a wider scope than integrity programs.

The main implication of the developed framework is that it provides scholars and practitioners who are particularly interested in organizational integrity with a new lens for designing and evaluating IPs. This new lens accentuates, firstly, that without intentional wholeness, the IP lacks authenticity (the IP is then merely a façade to satisfy the opinions of others). Secondly, without organizational wholeness, the IP lacks internal coherence and specificity (the IP is then too generic to fit the organization's needs). Thirdly, without societal wholeness, the IP lacks contextual embeddedness (the IP is then too isolated to be acceptable to relevant others). Finally, without processual wholeness, the IP lacks adaptive abilities (the IP is then too static to respond to changes).

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The background features a large, faint number '7' on the right side. On the left side, there are several overlapping, semi-transparent gear shapes of various sizes, creating a mechanical or industrial aesthetic.

# **CHAPTER 7.**

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**CONCLUSIONS, RECOMMENDATIONS  
AND REFLECTIONS**

## 7.1 Introduction

The concern for public integrity is probably as old as government itself. But certainly today integrity is regarded as an indispensable and highly prized quality for public organizations (Huberts, 2014). The importance of integrity is for instance related to public trust (Lewis & Gilman, 2012), economic growth and social stability (Bossaert & Demmke, 2005), and the effectiveness of government activities (Maesschalck & Bertok, 2009). But despite the efforts of both national governments and international organizations to promote public integrity, integrity violations are frequent, recurring events within the public sector.

Given the importance of public integrity, the responsibilities of public organizations to foster integrity, and the complexities of integrity management it is important to expand our knowledge and understanding in this area. As such this dissertation centers on the general question: **How to manage integrity in public organizations**. Various themes are relevant in this regard, starting with attention to the origins and developments of integrity policy processes, the institutionalization and management of integrity in practice, and the evaluation of integrity systems and programs based on insights and criteria derived from the literature. These themes lead to the following sub-questions: **What characterizes the origins and developments of Dutch public integrity policies, how do Dutch public organizations institutionalize and manage integrity in practice, which criteria can be derived from the literature to judge the quality of integrity systems/programs, and what are overall recommendations in this regard?**

The conclusions pertaining to these research questions are presented in sub-section 7.2. In sub-section 7.3 recommendations are made that may help to improve integrity management on both the national and organizational level. Subsequently, reflections on the relevance, limitations, and avenues for further research are presented and discussed in sub-sections 7.4, 7.5 and 7.6.

## 7.2 Conclusions

The first sub-question focusses on the origins and developments of Dutch national integrity policies in the period 1990-2010. Based on part 1 (chapter 2) of this dissertation it can be concluded that prior to the 1990s integrity was not a topic that received much structural attention in the Dutch public sector. Integrity policies predominantly consisted of unwritten agreements and voluntary measures. This all changed from the early 1990s, starting with the formalization of rules-based integrity policies (phase one and two: 1990-2003), followed by the development of more values-based integrity policies (third phase: 2003-2007), and a rather indecisive fourth phase (2007-2010) that announced attention to political integrity, whistleblowing and the organizational aspects of integrity management.

The most substantial policy changes occurred during the first and third phase and entailed paradigmatic shifts towards (respectively) more formalized and more values-based integrity policies. The convergence of societal problems (e.g., the occurrence of 'high impact' integrity violations and critical policy reviews), political commitment (e.g.,

ministers, members of parliament) to address these problems, and the availability of suitable policy solutions triggered these substantial policy changes.

In summary, it can be concluded that the national integrity policies in the period 1990-2010 sometimes developed gradually and sometimes abruptly. At the same time, it is important to relativize the influence of (changing) national integrity policies as these entail only minimum requirements that are not based on a coherent and systemized national integrity policy or strategy (GRECO, 2019; Netwerk Goed Besturen, 2021). Therefore, individual organizations are -to a large extent- responsible to make their own decisions regarding the content and design of their integrity management approach. Consequently, differences can be expected among public organizations in this regard.

The second sub-question focusses on the institutionalization and management of integrity in Dutch public organizations in practice. Based on part 2 (chapters 3 and 4) of this dissertation it can be concluded that public organizations (as expected) differ in the way they institutionalize and manage integrity. Six types of institutionalization approaches were found and presented in chapter 3: central and decentral organized integrity offices and officers; reactive and passive integrity approaches; and internally and externally organized integrity networks. Each type has its own advantages and disadvantages, whereas organizational size and commitment are of influence on the institutionalization choice.

A follow up conclusion is that it turns out to be quite a challenge for individual organizations to develop, implement and maintain adequate integrity policies on their own, and that it is beneficial for organizations to join external integrity networks, or to be more precise 'integrity partnerships'. This certainly seems to be the case for smaller organizations which often lack the resources (e.g., time, budget, and expertise) for integrity management. Four types of integrity partnerships were found and presented in chapter 4: the Workshop (sharing integrity instruments), the Pool (sharing integrity capacity), the Forum (sharing integrity knowledge) and the Megaphone (sharing integrity influence). The motives for joining these partnerships are different, but are all related to what individual organizations miss or lack in terms of integrity management (e.g., resources, capacity, experience, and influence). The organizational characteristics of each partnership differ as well, for instance in terms of number of participants, organizational similarity and the degree of formality.

In summary, it can be concluded that there is no one best way of organizing integrity and that organizational size, commitment and needs are of influence on how integrity is actually institutionalized and managed in public organizations. The lack of a one-size-fits-all approach implies that organizations have to determine which integrity support structures (like for instance the appointment of integrity officers, or joining specific integrity partnerships) are most suitable to foster integrity.

The third sub-question focusses on the criteria for integrity management that can be formulated based on theory. Based on part 3 (chapters 5 and 6) of this dissertation it can be concluded that theory provides various criteria that can be used for developing integrity management frameworks. Chapter 5 presents a framework that contains seven theory-based criteria that constitute a complete and effective integrity management system. The seven elements of the framework are: attention to and clarity about integrity, ethical leadership, a balanced rule- and value-based integrity strategy, integrity policies, organizational arrangements and critical reflection on what matters and works. This framework is applied to evaluate and compare the completeness of the integrity systems in three European cities. Based on these evaluations several conclusions can be drawn. In the first place, it turned out that the framework is suitable for evaluating the integrity systems of local government organizations in different countries. In the second place, it can be concluded that the different administrative contexts are of influence on the content and design of local integrity systems. In the third place, it can be concluded that what the three studied integrity systems have in common is that they can be improved in terms of: long-term awareness and support for organizational integrity, clarity regarding the definition of (and vision on) integrity management, critical reflection on the integrity system based on thorough policy analyses and evaluations.

Chapter 6 presents a newly constructed framework that contains four normative criteria that pertain to the *integrity* of integrity programs. These criteria are directly deduced from the concept of integrity, which in particular refers to a state of wholeness. The four criteria are: intentional wholeness, organizational wholeness, societal wholeness, and processual wholeness. Each of these criteria is operationalized into three sub-criteria and six indicators, which results in a comprehensive evaluative framework for assessing and advancing the integrity of integrity programs. The research concludes that the framework provides scholars and practitioners with a new lens for designing and evaluating integrity programs. This new lens accentuates, firstly, that without intentional wholeness, the integrity program lacks authenticity (it is then merely a façade to satisfy the opinions of others). Secondly, without organizational wholeness, the integrity program lacks internal coherence and specificity (it is then too generic to fit the organization's needs). Thirdly, without societal wholeness, the integrity program lacks contextual embeddedness (it is then too isolated to be acceptable to relevant others). Finally, without processual wholeness, the integrity program lacks adaptive abilities (it is then too static to respond to changes).

In summary, it can be concluded that different types of criteria emerge from the literature, leading to different integrity management frameworks. Additionally, it is noticeable that in addition to the differences between these criteria some (rather) similar criteria can also be distinguished. Some striking differences and similarities are briefly mentioned below.

To ensure that an integrity program is used for the 'right reasons' the normative framework specifically emphasizes the importance of the moral motivations and considerations of those who are in charge of these programs. The normative framework also pays more attention to the involvement of relevant stakeholders (external context) in the development and implementation of the integrity program. The effectiveness-based

framework, on the other hand, refers more explicitly to specific integrity measures the organization should have in place, strongly emphasizes the importance of organizational integrity arrangements, and of a clear definition of integrity. In terms of similarities, both frameworks have criteria that relate to: leadership, adequate resources for integrity management, the interconnectedness of integrity measures and the integration of integrity management with other organizational processes and disciplines. Both frameworks also explicitly pay attention to the processual aspects of integrity management which involves planning, monitoring, evaluation and adaptation activities.

## 7.3 Recommendations

Inspired by the research presented in the previous chapters, and in line with the ambition to also make a contribution to policy practice, several recommendations are made for the improvement of integrity management in the public sector. As three out of five research chapters are exclusively based on empirical research conducted in the Netherlands, the recommendations certainly pertain to the Dutch context. But since many countries, particularly in the western world, face similar challenges in the field of public integrity they most likely can benefit from these recommendations as well. The first five recommendations are directed to the national government, the other five recommendations are directed to individual government organizations.

### 7.3.1 Recommendations for the national level

Based on institutional theory and on the analysis of the developments of national integrity policies it can be concluded that external pressure is a driver for organizational action (chapter 2). The existence of legislation that entails specific integrity provisions is crucial to encourage public organizations to adopt integrity policies and measures. Without legal obligations, public organizations would probably be less prepared to adopt integrity policies and measures. Once in a while the set of legal obligations should be evaluated. Within the Dutch context an update of the integrity legislation should be considered. As such, it could for instance be decided to make the appointment of integrity functionaries mandatory for all public organizations. Similarly, the 'Basic integrity principles' (which are based on an agreement between the Ministry and public umbrella organizations) formulated in 2006 seem to be ready for an update too. Moreover, given the unclear status of these 'Basic integrity principles' adoption of these principles in the Civil Servants Act may be considered as well.

Periodic monitoring that provides insight into the implementation of mandatory (and agreed upon) integrity policies (and principles) within government organizations is another valuable source of pressure (chapter 2). Policy evaluations can be used by the national authorities and umbrella organizations to encourage government sectors that are lagging behind. Therefore, it is necessary that the policy evaluations are critically assessed and, if needed, accompanied by firm recommendations. Policy monitors should ideally not be restricted to merely assessing legal provisions. The incorporation of insights from academic research on integrity management is recommended as this may provide input for policy improvements.

The clarification of the concept of integrity is another recommendation (chapter 6). In the Netherlands, this concept is defined very broadly and refers to both legal and moral qualities, such as playing by the rules and adhering to public values. The downside of such a broad and fluid definition of integrity is that it creates ambiguity, which is demonstrated by various integrity investigations in which different investigative bodies came to different judgments on the same integrity issue. As such, the national government should initiate a discussion on the content and scope of the concept of integrity.

The national government should also develop a clear and more coherent public integrity strategy. In the Netherlands, the Civil Servants Act and the 'Basic integrity principles' are not only outdated, but they also lack an overall vision on integrity management. Based on the formulated definition of integrity, the government should articulate its public integrity ambition and reflect on the required set of interrelated integrity measures and actions that constitute an adequate integrity system or program (chapters 5 and 6).

This research has also pointed out that it can be quite a challenge for individual organizations to develop, implement and maintain adequate integrity policies on their own (chapters 3 and 4). This certainly seems to be the case for smaller organizations which often lack the resources (e.g., time, budget, and expertise) for integrity management. In addition to the support of umbrella organizations and the establishment of 'integrity partnerships' with other organizations it is recommended that the national government also supports public organizations in this regard. The decision of the Dutch Ministry of the Interior to disband the former National Integrity Office that supported government organizations with all kinds of practical integrity tools (like ready to use dilemma training and risk-assessment methodologies), brochures, workshops, courses, conferences, and many other products and services can be called a loss in this respect. The reinstatement of such an Office should be considered.

### ***7.3.2 Recommendations for the organizational level***

For all (Dutch) public organizations the integrity obligations arising from the Civil Servants Act and from the (agreed upon) 'Basic Integrity Principles' are minimum requirements to comply with. In addition to these uniform minimum requirements, public organizations are recommended to map specific integrity risks and dilemmas as this provides valuable input for a customized integrity management approach (chapters 5 and 6).

It is also recommended for all public organizations to formalize the organization's integrity management approach and to develop a so-called 'integrity plan'. A formalized integrity plan is a useful tool to describe the organization's integrity ambitions and goals, to define the necessary integrity measures and activities, to determine the required input of various organizational actors and to specify how to assess the results of integrity policies and measures (chapter 3). As such, an integrity plan may be helpful to keep focused, to prevent the attention to organizational integrity from diminishing and to ensure that the integrity ambitions are actually implemented and realized.

The appointment of a designated integrity officer who is in charge of the integrity plan is recommended as well (chapters 3, 5 and 6). An integrity officer fulfills a coordinating position and ensures the coherent implementation and continuity of the organizational integrity policies. The integrity officer acts as a linchpin and connects all the internal integrity actors, maintains oversight, and ensures that integrity remains on the agenda.

Organizations are also recommended to analyze integrity violations (chapter 5). Instead of labelling integrity violations as unfortunate incidents conducted by 'bad apples', organizations should critically analyze integrity violations and assess whether these violations represent cultural or structural system failures. The preparedness to honestly and thoroughly reflect on integrity violations enables the organization to learn from mistakes and to take the necessary measures to improve the integrity management program or system.

Similarly, organizations are encouraged to critically reflect on their integrity system or program periodically (even when no integrity breaches are apparent). Critical and proactive reflection based on monitoring and evaluation is important for the continuous improvement of the organization's integrity management (chapters 5 and 6). Critical reflection provides valuable input for updating the organization's integrity plan. Critical reflection should, however, not only be based on the organization's current integrity measures (and whether these actually work), but should also involve a reflection on the organization's risks and dilemmas, and on new societal trends and developments that require an update of the organization's integrity management approach.

## 7.4 Reflections on Relevance

This study provides a better understanding of the dynamics and limitations of Dutch national integrity policies. Although these policies certainly influence the content of integrity management on the organizational level it is also important to notice that individual organizations remain relatively free to make their own decisions regarding the content and design of their integrity management approach. The structured analysis of Dutch national integrity policies over a twenty-year period is innovative in its kind and it contributes to the current public integrity research literature.

From a more practical point of view this study systematically maps and compares different forms for institutionalizing integrity and explores in what way Dutch public organizations cooperate in this regard. Grounded in administrative practices, this study provides unique insights into how Dutch public organizations actually manage integrity. Depending on organizational size, commitment and needs organizations determine which integrity support structures (like for instance the appointment of integrity officers, or joining specific integrity partnerships) are most suitable in their specific situation. The followed inductive approach in this part of the study complements the traditional theory-based research publications on public integrity management.

Furthermore, although there is a growing acknowledgement among scholars that an integrated integrity management approach (in which various integrity measures and activities are combined and connected) is to be preferred, there is only limited knowledge of what such an approach should entail. To address this lack of knowledge two theory-based integral integrity management frameworks are presented in this study. The first framework is used for a comprehensive evaluation of the integrity systems of three large international cities. Among the many interesting results, the influence of the national institutional context stands out. The second framework is original because of its distinctive focus on normative criteria for assessing integrity management programs, and provides scholars and practitioners with a new lens for designing and evaluating integrity programs.

The study uses a multi-perspective research approach and combines various aspects from the literature on integrity management from different disciplines, but mostly from Public Administration and Business Administration. Despite differences between these disciplines, the cross-fertilization of insights seems to be valuable.

## 7.5 Reflections on Limitations

For both the author and the readers it is important to critically reflect on the limitations and flaws of the presented research. Different types of research limitations can be distinguished. In the first place, it should be noted that the first two chapters of this dissertation are based on articles that are published in 2013 and 2014 and may thus not reflect the current state of affairs. But although the analysis of the developments of Dutch national integrity policies (chapter 2) does not include the period 2010-2020, it seems that the three policy themes that have gained more prominence in this recent period (being political integrity, whistleblowing, and the organizational aspects of integrity management) are continuations of emerging themes in the period 2007-2010. Likewise, in chapter 3, six types of integrity institutionalization are presented, based on empirical research among local governments. Although it cannot be guaranteed that the typology exactly reflects the situation today, there seem to be no indications that new types have emerged, or that one of the found types is not used anymore since the article was published.

A second limitation pertains to the fact that most of the empirical research was conducted in the Netherlands. This raises for instance, the question to what extent the phases of national integrity policy development (chapter 2), the six types of integrity institutionalization (chapter 3), and the four types of integrity partnerships (chapter 4) are country specific. Do they only relate to the situation in the Netherlands, or can -more or less- comparable phases and typologies be expected elsewhere? The current research does not provide answers to these questions. Despite this, it can be assumed that the research findings do have value in an international (western) context. They can for instance, be used to inform research on public integrity management abroad, or to inspire foreign public officials with Dutch integrity management practices. A western bias should, however, be taken into account.



In the third place, there are limitations pertaining to the integrity management frameworks presented in the chapters 5 and 6. Unlike the framework that was used to compare and to assess the integrity management systems of three large cities, the normative framework has not yet been used to conduct empirical research. In this regard, both its practical applicability and its perceived usefulness amongst scholars and integrity officials have to be explored. Another remaining question is how the two frameworks relate. Should they be applied separately and, if so, in what sequence? Or would it be possible/preferable to synthesize both frameworks into one assessment framework?

## 7.6 Reflections on Avenues for Future Research

The research limitations presented in the previous paragraph provide suggestions for future research. To verify the assumption that the developments of Dutch national integrity policies in the period 2010-2020 are mere continuations of themes that already emerged in the period 2007-2010, it is recommended to conduct a thorough analysis of the problem, politics, and policy streams. Such an in-depth analysis reveals if there are certain developments in this field that have not been observed yet. Likewise, additional research among more and other public organizations could provide valuable insights on how public organizations actually institutionalize and manage integrity internally, and externally via partnerships with other organizations.

It would be preferable to conduct this follow-up research not only in the Netherlands but also in other countries. This provides insight into the question if, and to what extent, developments of national integrity policies and integrity institutionalization/management approaches are country specific. Besides, such international comparisons are not only interesting from an academic point of view; it could also inspire and inform integrity officers with international practices. A more active exchange and cross-fertilization of knowledge and experiences in the field of integrity management seems to be beneficial, as many countries may face similar challenges in this regard.

The two integrity management frameworks also require follow-up research. The operationalization of the criteria and indicators of the normative framework have to be tested to ascertain their applicability for empirical research purposes. Moreover, a thorough analysis of the differences and similarities of the two frameworks may be helpful to determine if a synthesize of both frameworks into one integrity management assessment framework is feasible. Certainly, from a practical point of view a combination of both effectiveness and normative criteria into one framework for evaluating organizational integrity management systems/programs seems to be preferable.

Another avenue for further research is related to organizational size and in particular to the question how integrity is, and can be, managed in small organizations. Although the integrity provisions formulated in the Civil Servants Act also apply to small public organizations, they have fewer resources (e.g., budget, time, expertise) to implement these provisions and to develop comprehensive integrity systems and programs. At the same time, it

can be assumed that the integrity risks they face are substantial and maybe even more substantial than the risks of large government organizations. This raises the question what small organizations can do in this regard, in addition to engaging in integrity partnerships with other organizations. Are they sufficiently supported by the national government and umbrella organizations? Should they rely on the integrity services of private consultants, or should the expectations regarding their integrity management capacity simply be lowered? All in all, the question of how to manage integrity within smaller organizations seems to be an under-researched area that deserves much more attention.

I hope to be involved in this future research agenda. Certainly, since thinking about the cogs and wheels of integrity management and how this 'clockwork' can be improved will remain a challenge for both scholars, civil servants, and politicians for the foreseeable future.

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# **ANNEXES**

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# A

## About the author

Alain Hoekstra was born on January 20<sup>th</sup> 1971. He studied Public Administration at Erasmus University Rotterdam and conducted research on New Public Management as a visiting student at Victoria University of Wellington, New-Zealand. He obtained his Master's degree in Public Administration in 1995. Thereafter Alain started working for the public service. Since 2001 he worked in different capacities as an integrity policy advisor for the Dutch Ministry of the Interior and Kingdom Relations. In 2009 he started as a parttime PhD candidate at the Department of Business-Society Management, Rotterdam School of Management (Erasmus University Rotterdam). Next to his work as policy advisor for the Ministry and his academic activities, Alain is also active in several committees and working groups to advise non-governmental and other organizations on matters related to integrity management.



# PhD Portfolio

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PhD period: 2009 - 2022

Promotors: Prof. Dr. M. Kaptein (EUR) & Prof. Dr. L.W.J.C. Huberts (VU)

## Scientific publications

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- Presentation: '*A paradigmatic shift in ethics and integrity management within the Dutch public sector*'. Transatlantic Dialogue on Ethics and Integrity of Governance. Leuven University, June 2-5, 2005.
- Presentation: '*Understanding Integrity Policy Formation Processes*'. Permanent Study Group Quality and Integrity of Governance of the European Group of Public Administration. Bucharest, September 7-10, 2011.
- Presentation: '*Intersectoral cooperation as strategy for managing organizational integrity*'. Permanent Study Group Quality and Integrity of Governance of the European Group of Public Administration. Edinburgh, September 11-13, 2013.
- Presentation: '*Institutionalizing integrity management*'. Permanent Study Group Quality and Integrity of Governance of the European Group of Public Administration. Speyer, September 10-12, 2014.
- Presentation: '*Introducing a new key player in internal whistleblower procedures*'. International Whistleblowing Research Network. Utrecht School of Governance, June, 20-21, 2019.

### **Sideline activities**

- The Hague Academy of Local Governance: training international delegations of civil servants on integrity management (since 2010)
- Ministry of Justice: admission commission for notary candidates (2013-2016)
- Public Integrity: editorial board (since 2015)
- Center for Organisational Integrity: supervisory board (since 2019)
- United Nations: Reviewer of the implementation of the United Nations Convention Against Corruption (U.S. government 2019)
- Transparency International Netherlands: working group integrity (since 2020)
- Association for Confidential Integrity Counselors: board of experts (since 2020)



## Summary

Integrity is an indispensable and highly prized quality for public organizations. To uphold integrity, public organizations are encouraged to implement specific integrity measures. But despite these measures integrity violations still occur within the public sector, sometimes even on a daily basis. Therefore, it is important to expand our knowledge and understanding of public integrity management. Various themes are relevant in this regard, starting with attention for the origins and developments of national integrity policy processes, the institutionalization and management of integrity of public organizations in practice, and the evaluation of integrity systems and programs based on insights and criteria derived from the literature. These themes lead to the following sub-questions: ***What characterizes the origins and developments of Dutch public integrity policies, how do Dutch public organizations institutionalize and manage integrity in practice, which criteria can be derived from the literature to judge the quality of integrity systems/ programs, and what are overall recommendations in this regard?***

To answer the first sub-question an analysis is conducted of Dutch national integrity policies and how these have changed over time. This provides an understanding of the parameters for managing integrity in individual public organizations. Based on this analysis it can be concluded that national integrity policies have developed in several phases over time. The first two phases concern the rules-based formalization and regulation of integrity policies, followed by a more values-based third phase. The fourth phase indicates an emerging attention for political integrity, whistleblowing, and for the organizational aspects of integrity management. At the same time, it is important to relativize the influence of these (changing) national integrity policies as these only entail minimum requirements: Dutch public organizations remain -to a large extent- responsible for making their own decisions regarding the content and design of their integrity management.

To answer the second sub-question the research provides insights into how public organizations actually give substance to these policies and how they institutionalize and manage integrity in reality. It turns out that public organizations differ in the way they institutionalize and manage integrity. Six different types of institutionalization approaches were found and described: central and decentral organized integrity office(s); reactive and passive integrity approaches; and internal and external organized integrity networks. It also turns out to be quite a challenge for individual organizations to develop, implement, and maintain adequate integrity policies on their own and that it is beneficial for organizations to join external integrity networks, or to be more precise 'integrity partnerships'. Four types of integrity partnerships were found and described: the Workshop (sharing integrity instruments), the Pool (sharing integrity capacity), the Forum (sharing integrity knowledge) and the Megaphone (sharing integrity influence). In summary it can be concluded that there is no one best way of organizing integrity and that organizational size, commitment, and needs are of influence on how integrity is actually institutionalized and managed in public organizations.

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In line with the third sub-question, it seems that there is a growing agreement among scholars that an integrated integrity management approach in which various integrity measures and activities are combined and connected is to be preferred. The interlocked cogs and wheels on the cover of this book represent such an approach that is based on a set of well-organized and interconnected integrity measures and activities that fit together. As little knowledge is available about what such an approach should entail two integrity frameworks have been developed. The first framework consists of seven theory-based criteria that constitute a complete and effective integrity management system. The seven elements of the framework are: attention to and clarity about integrity, ethical leadership, a balanced rule- and value-based integrity strategy, integrity policies, organizational arrangements, and critical reflection on what matters and works. This framework is applied to evaluate and compare the completeness of the integrity systems in three European cities.

The second framework consists of four normative criteria, being: intentional wholeness, organizational wholeness, societal wholeness, and processual wholeness. This framework provides scholars and practitioners with a new lens for designing and evaluating integrity programs. This new lens accentuates, firstly, that without intentional wholeness, the integrity program lacks authenticity (it is then merely a façade to satisfy the opinions of others). Secondly, without organizational wholeness, the integrity program lacks internal coherence and specificity (it is then too generic to fit the organization's needs). Thirdly, without societal wholeness, the integrity program lacks contextual embeddedness (it is then too isolated to be acceptable to relevant others). Finally, without processual wholeness, the integrity program lacks adaptive abilities (it is then too static to respond to changes).

In line with the ambition to also make a contribution to the policy practice, several recommendations are made for the improvement of integrity management in the public sector. These recommendations certainly pertain to the Dutch context. But since many countries, surely in the western world, face similar challenges in the field of public integrity they most likely can benefit from these recommendations as well.

The (in total ten) recommendations are partly directed to the national government and partly to individual government organizations. The recommendations to the national level pertain to: the importance of adequate national integrity legislation and periodic integrity monitoring; the need for the clarification of the integrity concept and for developing a more coherent national integrity strategy; and for better integrity support structures, especially for smaller public organizations. On the organizational level the recommendations pertain to: the importance of mapping the organization's integrity risks and dilemmas; the benefits of formalized integrity plans and the appointment of designated integrity officers; the significance of critically analyzing integrity violations and of the periodic evaluation of the organization's integrity system or program.

## Samenvatting (summary in Dutch)

Het proefschrift start vanuit de constatering dat integriteit geldt als een onmisbare kwaliteit voor overheidsorganisaties. Overheidsorganisaties worden dan ook aangemoedigd om specifieke integriteitsmaatregelen te nemen. Desondanks komen overheidsorganisaties nog zeer regelmatig in opspraak vanwege (vermeende) integriteitsschendingen. Daarom is het van belang om de kennis op het gebied van integriteitsbevordering te verdiepen. Hierbij zijn verschillende thema's relevant, te beginnen met een analyse van de oorsprong en de ontwikkeling van het nationale integriteitsbeleid (1). Daarnaast is het van belang om inzicht te verkrijgen in de institutionalisering en het management van integriteit binnen overheidsorganisaties (2). Zo is het ook relevant om aan de hand van criteria (ontleend aan de literatuur) bestaande integriteitssystemen en -programma's te kunnen evalueren (3). Deze thema's leiden tot de volgende deelvragen die in deze dissertatie centraal staan: Wat kenmerkt het ontstaan en de ontwikkelingen van het Nederlandse publieke integriteitsbeleid, hoe institutionaliseren en managen Nederlandse publieke organisaties integriteit in de praktijk, welke criteria kunnen uit de literatuur worden afgeleid om de kwaliteit van integriteitssystemen/-programma's te beoordelen en wat zijn de algemene aanbevelingen in dit verband?

Het verlangen om de oorsprong en de ontwikkelingen van het Nederlandse integriteitsbeleid beter te begrijpen, heeft geleid tot hoofdstuk twee van dit proefschrift. Daarin wordt een analyse gepresenteerd van het boven-sectorale integriteitsbeleid en hoe dit zich in de loop van de tijd in een aantal fasen heeft ontwikkeld. Daaruit blijkt dat voorafgaand aan de jaren negentig van de vorige eeuw de aandacht voor integriteit wordt gekenmerkt door een informele en incident-gerichte aanpak. Dit veranderde in het begin van de jaren negentig met het aantreden van minister Dales die inzette op de formalisering en regulering van het integriteitsbeleid. Na de eeuwwende veranderde dit naar aanleiding van de bouwfraude en ontstond er een meer waarden-georiënteerde integriteitsbenadering. Sinds 2007 en daarna is de aandacht verlegd naar thema's als politieke integriteit, klokkenluiden en zijn de organisatorische aspecten van integriteitsmanagement meer in beeld gekomen.

Deze beleidsontwikkelingen op nationaal niveau werken uiteraard ook door op het niveau van individuele publieke organisaties. Tegelijkertijd is het van belang om de invloed van deze beleidsontwikkelingen te relativeren; Nederlandse overheidsorganisaties zijn in grote mate zelfverantwoordelijk gebleven voor de inhoud en vormgeving van hun eigen integriteitsbeleid. Dit leidt tot de vervolgvraag hoe overheidsorganisaties daadwerkelijk vormgeven aan het integriteitsbeleid en hoe zij dit in de praktijk institutionaliseren en managen.

In de hoofdstukken drie en vier zijn de verschillende manieren waarop overheidsorganisaties integriteit institutionaliseren en managen in kaart gebracht en gecategoriseerd. Hoofdstuk drie beschrijft zes verschillende institutionaliseringsbenaderingen, te weten: centraal en decentraal georganiseerde integriteitsorganisaties; passieve en reactieve integriteitsbenaderingen; en intern en extern georganiseerde integriteitsnetwerken. Tevens is uit het onderzoek naar voren gekomen dat het voor individuele organisaties

een hele uitdaging is om zelf een adequaat integriteitsbeleid te ontwikkelen, te implementeren en te onderhouden en dat het voor organisaties voordelig is om zich aan te sluiten bij externe integriteitsnetwerken. Hoofdstuk vier beschrijft vier typen integriteitspartnerschappen: de Workshop (gericht op het delen van integriteitsinstrumenten), de Pool (gericht op het delen van integriteitscapaciteit), het Forum (gericht op het delen van integriteitskennis) en de Megafoon (gericht op het delen van invloed op het gebied van integriteit). Samenvattend kan worden geconcludeerd dat er niet één beste manier is om integriteit te organiseren en dat de omvang, het commitment en de specifieke behoeften van de overheidsorganisaties van invloed zijn op de wijze waarop integriteit daadwerkelijk wordt geïnstitutionaliseerd en gemanaged.

Inmiddels lijkt er onder wetenschappers groeiende overeenstemming te bestaan over de voordelen van een integrale integriteitsmanagement aanpak waarin verschillende integriteitsmaatregelen en -activiteiten met elkaar zijn verbonden en gecombineerd. Deze thematiek staat centraal in de hoofdstukken vijf en zes van dit proefschrift. De in elkaar grijpende tandwielen op de omslag van dit boek vertegenwoordigen een dergelijke benadering die is gebaseerd op een reeks goed georganiseerde en onderling verbonden integriteitsmaatregelen en -activiteiten die bij elkaar passen. Omdat er nog relatief weinig kennis voorhanden is over wat zo'n aanpak precies behelst zijn er twee integriteitskaders ontwikkeld die gebruikt kunnen worden voor het evalueren van integriteitssystemen en -programma's.

Hoofdstuk 5 presenteert een kader dat bestaat uit zeven (op de theorie gebaseerde) criteria die samen een compleet en effectief integriteitsmanagementsysteem vormen. De zeven criteria zijn: aandacht voor en duidelijkheid over integriteit, ethisch leiderschap, een evenwichtige (op regels en waarden gebaseerde) integriteitsstrategie, specifieke integriteitsmaatregelen, organisatorische voorzieningen en kritische reflectie op wat ertoe doet en werkt. Dit kader is tevens toegepast om de volledigheid van de integriteitssystemen van drie Europese steden (München, Antwerpen en Amsterdam) te evalueren en te vergelijken.


Het tweede kader wordt behandeld in hoofdstuk zes en bestaat uit vier normatieve criteria (die eveneens aan de literatuur zijn ontleend en) die direct zijn afgeleid van de oorspronkelijke betekenis van het concept integriteit, te weten 'heelheid'. Dit kader beschrijft aan welke criteria een integriteitsprogramma moet voldoen om in zichzelf heel en integer te zijn. De criteria zijn: intentionele heelheid, organisatorische heelheid, maatschappelijke heelheid en procesmatige heelheid. Dit kader biedt wetenschappers en praktijkmensen een nieuwe lens voor het ontwerpen en evalueren van integriteitsprogramma's. Deze nieuwe lens accentueert in de eerste plaats dat een integriteitsprogramma dat niet goed gemotiveerd is authenticiteit mist; het is dan slechts een façade om aan de verwachtingen van externe derden te voldoen. In de tweede plaats accentueert het dat een integriteitsprogramma dat niet goed aansluit op de organisatie te generiek van aard is om aan de behoeften van de organisatie te kunnen voldoen. In de derde plaats accentueert het dat een integriteitsprogramma dat onvoldoende

maatschappelijk is ingebed te geïsoleerd is om acceptabel te kunnen zijn voor relevante anderen. In de vierde plaats accentueert het dat een integriteitsprogramma dat niet procesmatig georganiseerd is adaptief vermogen mist; het is dan te statisch om op veranderingen te kunnen reageren.

Vervolgonderzoek is niet alleen nodig om de operationalisering van de normatieve criteria te toetsen op toepasbaarheid voor onderzoeksdoeleinden. Ook is het nodig om een grondige analyse te maken van de verschillen en overeenkomsten tussen de twee kaders, met als vervolgvraag of het nuttig/haalbaar is om tot een synthese van beide toetsingskaders voor integriteitsmanagement te komen. Vanuit praktisch oogpunt lijkt een combinatie van zowel effectiviteits- als normatieve criteria in één raamwerk voor het evalueren van systemen/programma's voor het beheer van de integriteit van organisaties zeker de voorkeur te hebben.

In het afsluitende hoofdstuk zeven worden tevens enkele aanbevelingen gedaan ter verbetering van het integriteitsmanagement in de publieke sector. Deze aanbevelingen hebben betrekking op de Nederlandse context, maar aangezien veel landen (zeker in de westerse wereld) voor vergelijkbare uitdagingen staan op dit gebied kunnen ook zij hoogstwaarschijnlijk profiteren van deze aanbevelingen. De (in totaal tien) aanbevelingen zijn deels gericht aan de nationale overheid en deels aan individuele overheidsorganisaties. De aanbevelingen aan de nationale overheid hebben betrekking op: het belang van adequate nationale integriteitswetgeving en periodieke integriteitsbewaking; de noodzaak van verduidelijking van het integriteitsconcept en de ontwikkeling van een meer coherente nationale integriteitsstrategie; en op betere ondersteuningsstructuren voor integriteit, met name voor kleinere publieke organisaties. Op organisatieniveau hebben de aanbevelingen betrekking op: het belang van het in kaart brengen van de integriteitsrisico's en dilemma's van de organisatie; de voordelen van geformaliseerde integriteitsplannen en de aanstelling van aangewezen integriteitsfunctionarissen; het belang van het kritisch analyseren van integriteitsschendingen en van de periodieke evaluatie van het integriteitssysteem of -programma van de organisatie.





Integrity is an indispensable and highly prized quality for public organizations. Therefore, it is important to expand our knowledge and understanding of public integrity management. This dissertation is based on a series of research articles that address various themes that are relevant in this regard.

The first part of this dissertation provides insights into the origins and developments of Dutch national integrity policies. Analyzing national integrity policies is important as these policies set the parameters for integrity management of individual organizations. The second part provides insights into how public organizations actually institutionalize and manage integrity in practice. This part maps out how public organizations institutionalize integrity internally and how they establish or join external integrity partnerships. In the third part, two theory-based integrity management frameworks are presented. Whereas the first framework is based on effectiveness criteria, the second is based on normative criteria. These frameworks provide guidance for the content and design of organizational integrity systems/programs.

Inspired by the research findings and in line with the ambition to also make a contribution to the policy practice, ten practical recommendations are presented to improve integrity management in public organizations. The cogs and wheels on the front cover represent the constituent parts of an integrated and well-functioning public integrity management approach. This dissertation can be used by scholars in the field of integrity management, as well as to practitioners working in this field, such as integrity officers and policy workers. Alain Hoekstra is a seasoned expert on integrity management with more than 20 years of experience in this field. In his work he combines knowledge of integrity policies with practical advisory and research skills. He published numerous articles and book chapters on integrity management and he is active in many (international) networks in this area. He worked as a senior policy expert for the Dutch Ministry of the Interior and Kingdom Relations, was one of the founders of the Dutch National Integrity Office, and currently works for the Dutch Whistleblowing Authority.