

1 Integrity and integrity management in the Netherlands *Describing the scene, definitions, strategies and developments*

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Introduction

In today's world, public organisations pay more attention to ethics and integrity. In the Netherlands, public integrity was placed on the agenda in the early 1990s (Hoekstra & Kaptein, 2014). Dutch efforts in the field of integrity management can therefore be qualified as relatively long lasting.

This book provides an overview and analysis of the Dutch integrity management approach. It describes how the Dutch integrity system operates from both a national (part I) and an organisational (part II) perspective. The final section of the book (part III) contains academic reflections. All in all, the book provides insights that might inspire other countries in their own efforts to manage integrity. This book's target audience includes policy-makers, ethics and integrity entities, anti-corruption agencies, integrity and compliance officers, as well as NGOs, students, and researchers.

In this chapter, we start with a brief outline of the Dutch social, political and administrative context, followed by an overview of the main developments in integrity management within the Dutch government during the last 25 years. We then briefly reflect on the main concepts: integrity, integrity violations, and integrity policies. We argue that integrity management can be studied at different levels and from different perspectives. We conclude with some initial reflections on the Dutch system, and introduce the upcoming book chapters.

About the Netherlands

The Netherlands¹ is the main constituent country of the Kingdom of the Netherlands. It is a small, densely populated country with 16.9 million inhabitants (in 2015), located in Western Europe, with three island territories in the Caribbean². Amsterdam is the country's capital while The Hague holds the Dutch seat of government and parliament. Since 1848 it has been governed as a parliamentary democracy and a constitutional monarchy, organized as a 'unitary decentralized state' with central authority in combination with decentralized, in particular, local authorities. The Netherlands is a member of the European Union and the euro zone, has a market-based mixed economy, had the thirteenth-highest per capita income in the world in 2013, and ranked as the fourth happiest country in the world, reflecting a high quality of life.

Public administration in the Netherlands has four tiers: central government, the provinces, the municipalities and the water authorities. In addition, there are many (more or less) independent agencies, including public-private organizations, with responsibilities for addressing and solving social problems. This fits into a governance tradition of cooperation and tolerance between minorities, with cooperation between different pillars in society and coalition governments (Andeweg & Irwin, 2014), even though more polarization and fragmentation have become visible in the last fifteen years (Besamusca & Verheul, 2014).

The Dutch governmental system executes a number of tasks on behalf of the citizens, with a total of approximately 915,000 civil servants (including the educational system). The national state employs about 117,000 civil servants, the municipalities 148,000 (Ministry of the Interior and Kingdom Relations, 2015). The Netherlands has a relatively large and well-functioning central government, as illustrated by the scores on the World Governance Indicators (World Bank) which, according to Transparency International (2012), include a strong reputation for integrity.

More than two decades Dutch integrity policies at a glance

Although integrity has always been an important issue, it did not attain a permanent position on the Dutch political agenda until the early 1990s. Until then, integrity was just incidentally debated and policies often consisted of unwritten agreements and voluntary measures. An outline of Dutch integrity policies is presented below in three phases.

Phase 1 Agenda setting and regulation (1990-2003)

In the early 1990s, concerns arose in the Netherlands about the intermingling of the underworld with regular society. There were signs of attempts by criminal organisations to obtain key positions in the Dutch machinery of government through bribery and infiltration. This attracted the attention of the Ministry of Justice and of the General Intelligence and Security Service. With the aid of risk analyses, government ministries and a number of large municipal authorities were scrutinized for vulnerable processes and their resilience to integrity violations was defined. At the same time, a number of integrity scandals occurred within some municipalities. This led the then Minister of the Interior and Kingdom Relations to place integrity firmly on the agenda.

The Ministry of the Interior published its first integrity policy papers in the mid-1990s. Integrity policies were subsequently included in the Civil Servants Act. This included rules on side jobs, the reporting of financial interests, as on whistleblowing procedures and protection. The General Intelligence and Security Service set up a hotline where people could report integrity violations anonymously. The Ministry of Finance developed a method for conducting integrity audits and the Ministry of the Interior and Kingdom Relations produced a brochure for confidential integrity counsellors. Most measures in this phase were primarily rule-oriented. And although the Ministry of the Interior and Kingdom Relations regularly stressed the importance of value-oriented aspects, this did not result in concrete initiatives during this period.

Phase 2 Awareness and support (2003-2007)

Integrity policies intensified from 2003 onwards in response to a severe fraud and corruption scandal in the construction industry. In 2006 this led to an update of the Civil Servants Act. Among other things, it required government bodies to pursue integrity policies, to set up codes of conduct, and to introduce the oath of office. In this phase, government authorities also committed to a number of Basic Standards. These formulated further instructions for the design of integrity policies. For example, government organisations are required to devote attention to recruitment and selection, to conduct surveys for vulnerable positions, to protect confidential information, and to develop procurement and contracting procedures. In order to support government bodies with the implementation of these new standards, the Minister of the Interior and Kingdom Relations decided in 2006 to form the Dutch National Integrity Office (BIOS).

In addition to the impact of the construction industry fraud, this policy intensification is understandable in the light of various studies, which revealed that the government did not yet have its integrity policies in order. One of the conclusions was that integrity was not yet truly internalised. This led to more attention for the awareness aspect of integrity. Since then integrity became a topic in introductory courses for new employees, it was placed on the agenda during team meetings, and all kinds of integrity related courses have become, more or less, common practice within the Dutch government.

Phase 3 Integrity systems, organizing integrity, monitoring integrity (2007-present)

During this phase there has been growing interest in the theme of administrative integrity (elected and appointed holders of political office). This has resulted from a stream of incidences of misconduct and has led to an amendment of the Provinces, Municipalities and Water Authorities Act, explicitly highlighting the importance of, and responsibilities for, administrative integrity. Compared to integrity policies for civil servants (officials) one could assert that the concern for administrative integrity is of a more recent date. This is certainly seems to be the case for integrity programmes, measures and activities targeted at this specific group.

In addition, this period has been marked by growing attention to reporting systems for integrity violations (see also Chapter 4). A critical research report (Utrecht School for Policy Research, 2008) led to an adjustment of the existing *internal* reporting (whistleblower) regulation. During this period, a number of *external* reporting, advisory, and investigation institutions were also formed, like: a hotline for reporting integrity violations, a centre which advises whistleblowers on how to report their suspicions of misconduct, a Whistleblowers Expert Group, and the Council for Integrity Investigations in the Public Sector. Finally, a Bill was submitted on a ‘House for Whistleblowers’, intended to provide for the creation of an adequate and safe reporting possibility for whistleblowers.

Thirdly, a large number of policy studies were conducted. These were aimed at: the *implementation* of integrity policies within the Dutch government (Netherlands Court of Audit, 2010; Ministry of the Interior and Kingdom Relations, 2008; BIOS, 2012); *internal reporting systems* (De Graaf et al, 2013) and the nature and scale of integrity violations within the Dutch government (De Graaf & Struwer, 2014); as on *organisational aspects*

of integrity management: the impact of the financial crisis on public sector integrity programs (BIOS, 2012; Hoekstra, 2016); the quality of integrity policy documents (BIOS, 2013); the institutionalization of integrity in local government (Hoekstra & Kaptein, 2013); and how public organisations (can) cooperate in the field of integrity management (BIOS, 2015).

Finally, the Ministry of the Interior and Kingdom Relations evaluated its own coordinating role, and the integrity policies they prescribed for the public sector (2014). Furthermore they commissioned a future-oriented survey identifying the integrity implications of current trends in public administration (Van Veldhuisen & Snel, 2014). Although such studies and evaluations were continually conducted during 25 years of integrity policies within the Dutch government, the number of such studies during this period is striking. Furthermore we observe a growing interest for integrity systems, organizing integrity, and monitoring integrity (Lambooy & Hoekstra, 2015).

Integrity and integrity violations

This book focuses on the integrity of governance. Perceptions of the concept of integrity vary quite considerably. This section therefore briefly discusses the different interpretations, partly as a guide for the description and understanding of the many initiatives raised in later chapters. In the literature and research, at least eight visions of integrity appear (Huberts, 2014). These are summarised in the table below.

Table 1 Visions of integrity

- Integrity as wholeness**
- Integrity as integration into the environment**
- Integrity as a professional responsibility**
- Integrity as conscious and open action based on moral reflection**
- Integrity as a (number of) value(s) or virtue(s), including incorruptibility**
- Integrity as compliance with laws and codes**
- Integrity as compliance with relevant moral standards and values**
- Integrity as exemplary moral behaviour**

These eight visions are identifiable to different degrees in research and policy practices. This is unavoidable to some extent. Definitions remain contentious, always with the message that clarity regarding interpretation

is relevant to debates on integrity. At the same time, a number of principles are clearly prominent. The integrity of governance concerns the central moral values that are important and are widely shared. Key values include, for example, wholeness (consistency, including in the private sphere), incorruptibility (no conflicts of interest) and justice (compliance with rules and codes, including within the profession). These values are important for acting with integrity and for the question of what unethical action involves (integrity violations). This means that many different types of integrity violations can be distinguished (Huberts, 2005; Lasthuizen 2008; Lasthuizen, Huberts & Heres, 2011).

Table 2 Typology of integrity violations

Corruption: bribery
Corruption: favouritism (nepotism, cronyism, patronage)
Fraud and theft of resources
Conflicts of (private and public) interest through ‘gifts’
Conflicts of (private and public) interest through sideline activities
Improper use of authority
Misuse and manipulation of information
Indecent treatment of colleagues or citizens and customers
Waste and abuse of organisational resources
Misconduct in private time

The first types of integrity violations involve corruption and fraud. These phenomena have different meanings (De Graaf, 2007; Lawton et al., 2016), but they always involve abuse of a professional position in order to gain private benefits, with (corruption) or without (fraud) external parties. The international debate on administrative and political integrity very often focuses on such violations. At the same time, it was and is clear that the ethics of governance involves a wider range of issues, certainly in the Dutch context. A broader typology, including conflicts of interest, abuse of information and powers, intimidation and discrimination and misconduct in the private sphere is both useful and relevant in order to gain a grip on these. This is also reflected in the integrity affairs in which both civil servants and politicians become involved. At the same time, a critical note is called for. The broader typology also raises questions. There is often a grey area. Which side job, which form of wastage, which conduct in private time, or which manners are morally reprehensible or in conflict with

current basic moral standards and values. And when is there an error or a mistake, without any reason to doubt the integrity of those involved, or when is there ‘integritism’ (Huberts, 2005; 2014)? The integrity affairs that actually occur fully reflect this dilemma.

Dilemmas also arise through the awareness that good governance requires dealing with different public values that cannot (all) be realised (Smulders et al., 2013; De Graaf et al., 2014). Values such as justice, responsiveness, integrity and effectiveness may conflict. The need for fast and decisive action may be at odds with the requirement to act with due care and integrity, or maintaining friendly and direct relations with social groups and businesses may conflict with the requirements of unbiased and independent decision-making. This awareness is important when considering the significance and scope of integrity and integrity policies, the theme of this book.

Integrity policies

Van Tankeren and Montfort (2012) state that regardless of the definition of integrity (Table 1), integrity *policy* can be described as the set of intentions, choices and actions designed to promote and protect integrity within organisations. That set may involve a wide range of initiatives and instruments, which will ideally be a *combination* of ‘software’ (ethical culture), ‘hardware’ (rules and procedures), and an ‘operating system’ (organisation and coordination of integrity policies).

Table 3 Elements of integrity policies

Integrity policy elements	
Software	This concerns measures aimed at positively influencing the ethical culture within the organisation. They are designed for the internalisation of (public) values. They contribute to a culture marked by openness, safety, mutual respect and trust. Managers play a particularly important role in this. Examples of the ' <i>software</i> ' include: introductory courses, dilemma training courses, and codes of conduct.
Hardware	The culture and values within the organisation have to be supported by a clear set of rules, procedures and guidelines. Supervision, control and enforcement form the ' <i>hardware</i> ' of integrity policies. Financial, Legal, Audit and HR departments play an important role in this. Procedures for procurement, contracting, side jobs, as well as reporting and investigation procedures, are examples of hard controls.
Operating system	Integrity policies must be based on a shared vision. The measures (both soft and hard) should be consistent and interconnected in order to be effective. The policies should also be institutionalized and embedded. Other important aspects of the ' <i>operating system</i> ', include monitoring, evaluation, and risk analyses. Integrity officers play an important role in organising and coordinating integrity within organisations.

The three elements combined form the basis of integrity management at the organisational (meso) level. Integrity management is defined as: the consistent (systemic) efforts of an organisation focused on promoting integrity. The institutionalisation of integrity is a specific element of integrity management that refers to the process of advancing its sustainability, since care for integrity should be continuous rather than incidental. This is commonly referred to in terms of securing, anchoring, embedding or safeguarding organisational integrity. Many examples of this are presented in part II of this book.

Integrity at the macro level (part I of this book) concerns the structure and organisation of the integrity system and policies at the national level. Key issues are the responsibilities of the various actors and institutions that form part of this system, and that play a role in the formulation, implementation, or enforcement of centrally-established anti-corruption and integrity laws and regulations. The interplay between the actors and institutions involved is considered crucial. This has resulted in several national integrity studies (see also Chapter 13) that apply a systematic and interconnected focus on integrity management (National Integrity Systems NIS).

We focus less directly on the *micro* level, which involves the actions of individual persons. This includes the various roles that a person fulfils during his or her lifetime, and the ability to deal with conflicting values. It also concerns resisting temptations and dealing with moral dilemma's.

Integrity management: perspectives

Different views on integrity management have been developed within both Public and Business Administration. In this section, we first reflect on the question whether integrity can be influenced and managed within an organization. Next, we address two strategies for integrity management, followed by a discussion on institutionalisation.

Views on the susceptibility of integrity: apple versus barrel

To what extent can integrity be influenced and managed within organisations (Treviño & Nelson, 2004)? Some assume that values and standards are taught during childhood and that an organisation or its management can have little, if any influence on them at a later stage. From that perspective, integrity management is restricted to the establishment of good recruitment and selection policies (*'hire'*), taking measures against incidents in the event that an unethical employee (*'bad apple'*) oversteps the mark by starting an investigation, and – if necessary – dismissing the employee involved (*'fire'*).

Others assume that organisations are capable of encouraging and supporting ethical behaviour by their employees. From that perspective, the attention shifts from the limited *'hire & fire'* policies to organisation-wide integrity policies and systems that involve the organisational structure and culture. This means that if something goes wrong, not only will the *'bad apple'* be removed, but attention will also be given to any flaws in the organisational structure and culture (*'bad barrel'*) that could infect the other *'apples'*. Or to quote the French poet and writer Victor Hugo (1862):

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

These flaws caused by organisational darkness could include: the imposition of unrealistic targets, unclear or contradictory rules, and other issues that encourage integrity violations.

Most experts agree that organizations have the opportunity and – from the point of view of being a good employer – also the responsibility to support employees through the implementation of comprehensive integrity policies. Or to put it differently: employees have a right to policies that protect them from ‘un-ethicalities’. As such, integrity policies can be compared with internal Health & Safety policies that also are meant to protect employees, but then from physical and psycho-sociological hazards.

Views on integrity management: compliance versus integrity

When structuring measures for integrity management, the literature makes a distinction between ‘compliance’ and ‘integrity’ strategies (Paine, 1994). Characteristic of the first strategy is the top-down imposition of rules and regulations intended to prevent non-compliant behaviour. Norm-compliant behaviour is promoted by exercising supervision and the punishment of offenders. This strategy implies that people cannot be fully trusted, and that they need rules and supervision to stay on the right path.

The second strategy focuses on the joint (bottom-up) formulation and internalisation of organisational values. Ethical behaviour is promoted by strengthening the moral competence of employees, teaching them to determine what responsible and ethical decisions are. This strategy is of a more positive nature and supports employees in doing the ‘right’ thing. Depending on the specific situation, a combination of both strategies is generally considered to be most effective (Van Blijswijk et al., 2004; Cooper, 2006). Table 4 summarizes both strategies and illustrates some differences (Lawton, Rayner & Lasthuizen, 2013: 121).

Table 4 Strategies and differences

Orientation	Integrity strategy	Compliance strategy
Ethics	Self-governance and subjective responsibility according to chosen standards within organisations	Conformity with externally-imposed standards and objective responsibilities
Aim	Enable ethical conduct and moral reasoning	Prevent and combat unethical conduct and integrity violations
Behavioural assumptions	Social beings guided by values, principles, (public service) motivation and leaders and peers	Autonomous beings guided by economic self-interest
Policy	Integrity strategy	Compliance strategy
Methods and instruments	Internal controls, ethics education and training, communication and deliberation, ethical leadership, ethical culture and climate, reinforcement by rewards	External controls, education of rules and codes of conduct, reduced discretion and autonomy, auditing, monitoring and controls, reinforcement by sanctions
Implementation	Integrity strategy	Compliance strategy
Standards	Organizational mission, values and aspirations, social obligations, including law, rules, codes and standards	Criminal and regulatory law
Leadership and staffing	Managers, ethics officers	Lawyers, compliance officers
Activities	Lead (bottom-up) development of organisational values and standards, training and communication, integration in organisational system and culture, providing guidance and consultation, assessing values and performance, identifying and resolving problems and dilemmas	Developing (top-down) compliance standards, education and communication, handling reports of misconduct, conducting investigations, overseeing compliance audits and monitoring, enforcing standards with clear sanctions
Education and training	Ethical decision-making and values, dilemma training	Compliance standards and system, codes of conduct

Views on institutionalising integrity: informal versus formal

The question that subsequently arises is how integrity management can be firmly embedded within organisations? The literature (again) distinguishes two approaches to create a sustainable ‘good barrel’: informal and formal institutionalisation (Brenner, 1992).

The nature of the informal approach is implicit and concerns less visible and tangible processes. It does not concentrate primarily or directly on ethics, but certainly affects the organisation’s ethical climate. Leadership, fair remuneration, appraisal and promotion systems, trust and job satisfaction are often mentioned as organisational carriers for ethics and integrity.

By contrast, the formal approach is explicitly, directly and visibly aimed at promoting integrity within organisations (Tenbrunsel, Smith-Crowe & Umphress, 2003). This includes the development of integrity structures, standards and systems that support organisational ethics in a sustainable way. Although a balanced institutionalisation approach is recommended (Rossouw & Van Vuuren, 2004), advocates of the formal approach underline the strength of its visibility and clarity to employees (Berman, West & Cava, 1994) and emphasise that a formalised approach contributes to the effectiveness of integrity policies (Van den Heuvel et al., 2010). Yet another reason for a formalized integrity management approach is that, in case employees are prosecuted because of suspected integrity breaches, judges nowadays take into account the organization’s deployed integrity activities. What did the employer do to prevent the employee from turning into a ‘bad apple’ is then the central question to be answered. Tangible structures, systems, and documents specifically aimed at integrity management are certainly helpful in that regard. Table 5 summarizes both approaches and highlights some main differences (Hoekstra, 2016).

Table 5 Formal versus informal approaches

Approaches for institutionalising integrity		
Aspects	Formal	Informal
Policies	Specific policies, directly and explicitly aimed at fostering integrity	General policies with an indirect and implicit influence on the ethical climate
Products	Integrity structures, systems, procedures, standards and plans	Organisational culture, values, leadership, fair and just company procedures
Responsibility	Specific integrity officers are responsible in general, and they support line management in managing integrity in their units	Everyone is responsible for ethics and individual line managers are responsible for ethical behaviour in their units
Objectivity	Ensures an objective and univocal company-wide integrity management approach, based on coherent actions	Susceptible to subjective and ambiguous interpretations of individual managers, because of a decentralized approach
Visibility	Highly visible and tangible, for both internal and external actors (employees, managers and external watchdogs). Provides clear and accessible benchmarks for new personnel	Less visible and tangible, for both internal and external actors (employees, managers and external watchdogs). New employees are required to internalize the organization's culture
Accountability	Strong steering, monitoring and accountability mechanisms	Indirect steering and monitoring mechanisms, more difficult to account for
Pressure	Can be organised quickly and is therefore a common response to external pressure, which calls for immediate action Pitfall: abused as symbolic action	Internalising ethics in the organisational culture requires long term efforts. Pitfall: certain degree of ambiguity and slowness

Some initial reflections

How do the Dutch integrity policies score in terms of the perspectives outlined above, and which line can be distilled from the historical development of these policies? The policy developments seem clear and even logical. The topic was placed on the agenda, backed-up by the formulation of rules and standards, and enriched with value-oriented aspects. In addition to the ‘hard- and software’, we – more recently – witness an increase in interest for integrity systems, -management, -monitoring, and institutionalization.

In 2015 there has been a fair amount of attention to violators of integrity, certainly in the media. This increased the call for integrity screening to eliminate ‘bad apples’. But it is also clearly recognised within public administration that this requires broad integrity policies to expel ‘organisational darkness’.

Compared to some other countries, the Netherlands seems to rely more strongly on a values based (integrity) strategy. Whereas other countries follow rules based (compliance) strategies, the Dutch civil service has gradually adhered to a more positive integrity strategy (Hoekstra, Belling & Van der Heiden, 2008). Instead of a limited focus on ‘just’ avoiding *criminal* behaviour, the Dutch public sector also emphasises the moral, or *ethical*, aspects of public officials’ behaviour. As such, integrity policies in the Netherlands are not solely fixated on avoiding criminal acts such as corruption and fraud, but also address all kinds of ethical issues, including bullying, discrimination, intimidation, lying, cheating, theft, cutting corners, relationships on the work floor, the use of social media, and sexual harassment. Moreover, integrity policies are not just dedicated to avoiding wrongdoing. To a large extent they focus on training civil servants, enabling them to make the right ethical decisions, to encourage them to do it right, to act responsibly, and to make better moral judgements within the specific governmental context.

The popularity of the integrity (values) approach (see also Chapter 14) also causes some concern: ‘... its qualities should by no means be exaggerated: a value-based strategy without clear norms and rules and sanctions has no bite. Rather, the existing evidence on instruments suggests that a balance of compliance-based and values-based approaches may work best’ (Huberts, 2014: 179). The Organisation for Economic Cooperation and Development (OECD) also emphasises that: ‘The balance should be maintained and one should ... be aware of a too enthusiastic and radical switch towards the values-based approach...’ (OECD, 2009: 13). The Dutch Ministry of the Interior and Kingdom Relations also reports that the integrity approach has some disadvantages, because it focuses primarily on higher ethical standards with too little attention to potential violations. The Ministry is therefore aiming for a mix of the compliance-based and values-based approaches, with a variety of integrity instruments (Ministry of the Interior and Kingdom Relations, 2014).

With regard to the institutionalisation of integrity, there appears to be a preference for the more informal, indirect approach. Themes such as ethical leadership, professionalism, good employment practice, and public trust are rather fashionable within Dutch public administration. This does not alter the fact that in recent years, numerous policy studies emphasise that the institutionalization of integrity requires more attention (Hoekstra, 2016). This is – by the way – consistent with international comparative studies, which indicate that the embedding of integrity is a weak point in integrity management within all EU Member States (Demmke & Moilanen, 2012).

About the book

In this section we explain the structure of the book and the relationship between the different chapters. Integrity is considered at both the macro and the meso level in this publication. Part I provides a description of a number of central players and core elements of the Dutch national approach.³ In part II organisations explain how they design their integrity policies within these frameworks. Finally, in part III, researchers reflect on the current state of integrity affairs in the Dutch public sector.

In Chapter 2 Richard Hagedoorn and Melanie Hermus discuss the integrity regulations and policies for civil servants and (political) administrators. They describe the system responsibility and coordinating role of the Minister of the Interior and Kingdom Relations in relation to the integrity policies of the public sector. This chapter addresses (national) integrity policies, laws, standards, evaluation, monitoring and support. The authors also outline a number of trends and developments in Dutch public administration which influence integrity (programs), such as: cut-backs, increased flexibility in the labour market, and decentralisation.

In the Netherlands, individual government organisations are themselves responsible for implementing and enforcing integrity policies. In Chapter 3 Marijn Zweegers and Alain Hoekstra explain how BIOS supports government organisations in that respect. BIOS plays an intermediate role, because it translates national legislation into ready to use instruments. As such it enhances organisational implementation processes. In contrast to other international anti-corruption or integrity agencies, BIOS does not investigate incidents, but has a purely preventive task. BIOS develops instruments, shares knowledge, organises networks, conducts research and advises organisations.

All preventative measures and support can't prevent things from going wrong. Integrity violations still occur regularly. How can these be reported, and how are reporters protected? In Chapter 4 Alex Belling and Ed Fenne focus on internal and external reporting mechanisms that can be deployed if the preventive policies nevertheless fail. The authors describe the different reporting systems, devoting particular attention to the role of confidential integrity counsellors.

What happens once abuses have been reported? In cases where the report appears to be correct, investigations must be conducted. Hans Groot outlines how organisations can conduct internal integrity investigations in Chapter 5. Groot provides a number of practical guidelines for conducting internal investigations. Peace talks, uniform protocols, the importance of after-care and coincidence with criminal investigations are all raised here.

Integrity violations such as fraud or corruption cannot be settled solely through internal investigations. The procedures for criminal law investigations into public integrity violations are described in Chapter 6. Erik Hoenderkamp places the emphasis here on the role of the Rijksrecherche ('Central Criminal Intelligence Agency') and the Public Prosecution Service.

In Chapter 7 Terry Lamboo and Jessica de Jong describe the developments in integrity monitoring during the past decade. This is no longer confined to evaluating whether policy measures have been implemented, but also involves checking the extent to which these have penetrated to the work floor, and how integrity is perceived by employees, politicians and administrators. The authors emphasise the importance of monitoring and briefly discuss the number and nature of the violations. This first section of the book thus primarily concerns a number of important (macro) aspects of the Dutch NIS, namely policies, support, reporting, investigation and monitoring.

In part II we move to the (meso) organisational perspective and focus on a number of individual government organisations. How do they address integrity? A choice has been made here to give the floor to a small municipal authority first, because this illustrates how a small organisation with fewer resources can also comply with the policy frameworks outlined. As a comparison a larger municipal authority follows, that of Amsterdam. Then

two large national organisations are presented: the Custodial Institutions Agency (DJI) and the Netherlands Tax and Customs Administration. We close with the Province of Limburg, which shows how an organisation can design and implement integrity policies via an external network on a regional level.

In Chapter 8, integrity officer Aafje Stout describes how she manages integrity within the small municipality of Hellevoetsluis, and which challenges she faces in that position. She describes the roles of the integrity officer and the loneliness of that job, but also how she manages to involve other actors (ethics coalition) within the organisation.

Jeanine Kooistra describes in Chapter 9 the development of the Amsterdam Integrity Bureau (IB), which employs twenty integrity officers. This integrity office supports the municipality and has four pillars: internal investigations, risk analysis, screening, and training and advice. The core elements of the policies are described on the basis of a model. The chapter focuses in particular on integrity risk analyses as the foundation for integrity policies and measures.

The Custodial Institutions Agency also has its own office with its own integrity coordinator. The Custodial Institutions Agency's integrity approach is explained in Chapter 10. Attention is devoted here to investigations, training, recording violations and conducting research. Dick van Lingen describes how integrity is integrated into the daily operations, as in regular staff interviews and training. In this way, integrity is embedded in the organisation, to ensure that it receives permanent attention.

The Netherlands Tax and Customs Administration also has a separate department for promoting integrity. Hans Visser argues in Chapter 11 that integrity is a shared responsibility and how, in accordance with this, he has organised an internal integrity network. Specific responsibilities have been assigned within the Tax and Customs Administration for the development, application and monitoring of integrity policies. Those responsible work closely together, which benefits the effectiveness of the policy.

Chapter 12 also focuses on the network approach, but with regard to external networks with other organisations rather than the internal ones. Rick Duiveman reveals how a broad alliance between provincial, municipal and

water authorities is used to promote integrity. The Netherlands has several of such alliances, but Limburg holds the largest one. Limburg has opted for a joint integrity approach and regulations, but also shares facilities such as the position of the regional confidential integrity counsellor.

Part III consists of three chapters written from a more academic perspective. Just as a search for consistency in fostering integrity is important within an organisation, as shown in the integrity infrastructure of BIOS and the Amsterdam model, this is also important at the national level. The Dutch National Integrity System (NIS) serves that purpose. The NIS model makes clear what institutions contribute to a country's integrity performance. In Chapter 13 Willeke Slingerland summarises the results of her 2012 NIS study. The emphasis lies on the presence and quality of the NIS institutions, and whether they have the necessary resources. It also makes clear the areas in which the NIS is vulnerable. Slingerland emphasises the importance of cooperation and how the different elements and structures reinforce each other in the Netherlands.

This analysis is consistent with that of Christoph Demmke in Chapter 14, from a more international EU perspective. In various studies Demmke has examined how EU countries deal with corruption and integrity, and puts the Dutch developments in that perspective. He takes a positive view, but also presents some reservations. In addition, he considers decision-making at the European level and the role that the Netherlands played in agenda-setting and decision-making. He sees a pioneering role, giving hope of a step forward during the Netherlands' EU presidency in 2016.

In the final chapter, Leo Huberts reflects on the contributions presented on the basis of his research and knowledge of integrity in the Netherlands and beyond. Is there such a thing as a 'Dutch approach' to corruption and integrity? What are the key features of this and what can be learned from this for the development of policy in other, similar countries? He takes a fairly positive view of this, with hope for the EU presidency, but also devotes attention to the dilemmas that the Dutch approach faces in the Netherlands itself. All in all, an attempt to place the Dutch approach in a realistic perspective.

Notes

- 1 We present a brief introduction, simply based on for example en.wikipedia.org/wiki/Netherlands and www.government.nl/policy-areas/government-and-state. See for more information on the governance system: Andeweg and Irwin 2014 and for statistics the website of the Ministry of the Interior: kennisopenbaarbestuur.nl/ (unfortunately in Dutch), with also specifics on number of employees.
- 2 Because of the major differences in the social and governance context, we will not discuss the Caribbean part of the Kingdom (a very interesting topic, but not for an outline of the ‘Dutch approach’).
- 3 This is followed by sketches on a national level and from a number of organisations. This required choices to be made, and we do not pretend that this overview is exhaustive. This explains why a number of actors, such as the Netherlands Court of Audit, local audit offices, the National Ombudsman and local ombudsman organisations, as well as various other organisations that play a role in this, are not explicitly included in this book.

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