

# 13 Integrity as a shared responsibility

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## Introduction

In the Netherlands, major steps forward have been made in recent years with the development of an organisation-specific integrity policy. For the embedding of integrity, it is important that organisations also look beyond their own organisational boundaries and ask themselves how they can work on integrity together. This chapter concerns the Dutch ‘National Integrity System’ (NIS). The NIS model shows what individual institutions contribute towards a country’s integrity performance. At the same time, it opens our eyes to the opportunities available if integrity becomes a common goal and institutions perceive this as a shared responsibility

## Outcomes of the NIS study

We have already been thinking for decades now about the questions of whether and how we can organise our society in a way that promotes integrity and prevents corruption. Policy-makers and academics now share the view that this requires a joint approach: an approach in which central and decentralised institutions work together. Partly for that reason, the international anti-corruption NGO Transparency International (TI)<sup>1</sup> has developed the National Integrity System (NIS)<sup>2</sup> model. This model makes it possible to investigate the extent to which a country’s system of institutions, policy instruments and laws and regulations is effective enough to stimulate integrity and prevent corruption. In 2011/2012, 25 European countries were investigated on the basis of this model. The study<sup>3</sup> (Slingerland et al., 2012a) commissioned by TI Netherlands shows that the Netherlands has a fairly solid NIS. This means that the Netherlands is strong in promoting integrity and the prevention, detection and punishment of corruption. This does not alter the fact that the study also exposes weak points in the Dutch NIS. Some of these have since been addressed. This chapter briefly explains the most striking features of the Dutch NIS.

### *The formal NIS is strong*

If a country wants a strong NIS, a condition for this is a strong political-institutional and socio-economic basis. After all, the 13 central institutions of a country, which are individually and jointly responsible for promoting integrity and preventing corruption, are based on this. Critical factors here include the available resources, the degree of independence and transparency, the method of accountability, the realisation of the integrity policy and the institution's interpretation of its own role. On this basis, most Dutch institutions appear to be adequately to very well organised (Slingerland e.a., 2012a: 285). Three institutions stand out, through their watchdog function and strong focus on the field of integrity.

#### **The Netherlands Court of Audit**

The Netherlands Court of Audit (Algemene Rekenkamer)<sup>44</sup>, for example, is one of the stronger institutions in the Dutch NIS. (Slingerland e.a., 2012a: 183-197) The Court of Audit monitors the accuracy of central government income and expenditure and whether the central government implements policy as intended. The Court of Audit does this entirely independently and decides for itself what it investigates. One example is the *Trendrapport Open Data (Open Data Trend Report)* published in 2015 (Netherlands Court of Audit, 2015a). In this report, it warns that the supply of data of importance for public control of government finances and government action has not yet increased substantially and that furthermore, there is a fragmented landscape on the supply side of open data (Netherlands Court of Audit, 2015a: 41-42). Its critical findings are not always warmly welcomed by government organisations, but do ensure that political and public discussions on certain policies can be substantiated on the basis of its reports. The website of the Court of Audit contains an Integrity Guide on the main tips and standards for integrity within public organisations (Netherlands Court of Audit, 2015b). The Netherlands Court of Audit conducts regular audits of the status of integrity management, including in central government, and makes clear statements on any shortcomings (Netherlands Court of Audit, 2010).

#### **The National Ombudsman**

A second strong Dutch institution is the National Ombudsman.<sup>5</sup> This institution enjoys a high degree of independence, both by law and in practice. The Dutch House of Representatives appoints the National Ombudsman on the basis of criteria that it formulates itself. The National

Ombudsman is successful in the way in which it settles complaints of individual citizens regarding government actions. The organisation is also successful in advising public organisations on the quality of their service provision (Slingerland e.a., 2012a: 168-182). Because the National Ombudsman also conducts research on its own initiative into the propriety of government action in individual and structural matters, the institution increasingly makes statements on cases in which integrity is at issue. For example, the National Ombudsman emphasises the importance of independent investigation of potential abuses or tragic events in which the responsibility of a government organisation is investigated. In such cases, the appearance of any conflict of interest must be avoided (National Ombudsman, 2011: 9). At the same time, the institution is alert to conflicts of interest that arise when government organisations both maintain supervision and handle complaints. A recent example is the Ombudsman's criticism of a Bill which would make the Intelligence and Security Services Review Committee also responsible for independent handling of complaints (National Ombudsman, 2015). The decisions of the National Ombudsman are not enforceable, but in practice, they do have a degree of authority, as the media reports on them and the House of Representatives regularly calls the government to account in response to these decisions (Slingerland e.a., 2012a: 181-182).

### The media

The media form a third substantive pillar in the strong Dutch NIS. Dutch law guarantees free and independent media. As far as we are aware, censorship is rare in the Netherlands and journalists enjoy a high degree of freedom. The media play an important watchdog role (Slingerland e.a., 2012a: 218-240). They regularly report on matters concerning violations of integrity and corruption. In some cases, it was also the media that brought these instances of corruption to light. Thanks to these publications, local administrators and businesses were investigated by the judicial authorities and court cases are currently in progress regarding this local corruption. The watchdog role of the media is under pressure, partly through cut-backs in the public broadcasting service, the falling number of newspaper subscriptions and a strong concentration of ownership in the media sector. This primarily constitutes a risk for control of local and regional administration. The emergence of new media such as the internet and smart phones offers citizens the possibility of sending digital messages into the world which reach large numbers of people in a short space of time. This

public journalism is important, but only partly fills the gap that has been created.

### *Corruption not easy to investigate*

It is notable that the strong institutions are not those specifically focused on integrity, such as the Law Enforcement Agencies, Anti-Corruption Agencies or Civil Society. If we look at the Dutch Law Enforcement Agencies, we find that the complex, major corruption cases take up a large part of the capacity of the police force, the Public Prosecution Service (Openbaar Ministerie) and the Rijksrecherche (Central Criminal Intelligence Agency), sometimes at the expense of other (corruption) cases. Corruption is not easy to investigate. In practice, suspicions of corrupt conduct are far from always reported, but are often settled through disciplinary measures. This means that no lessons can be learned from the incidents and furthermore, the risk remains that those involved will continue their corrupt practices elsewhere. Private research agencies are also often involved in an investigation into possible integrity violations. As a result, important evidence has sometimes disappeared at the moment that the enforcement agencies were called in (Slingerland e.a., 2012a: 128-152). The enforcement agencies still do little to prosecute Dutch companies that are guilty of corruption in other countries. The Public Prosecution Service is not active enough in countering foreign corruption. It is important that extra resources become available to counter corruption and that there is openness regarding settlements in corruption cases. (Transparency International, 2015). The Public Prosecution Service should also prosecute natural persons more often, in order to eliminate the impression of impunity (Transparency International, 2015).

None of the pillars cooperate enough yet with other public, social and private organisations in the field of anti-corruption. One could therefore justifiably ask whether the NIS forms an integrated whole that works jointly for integrity, or whether each one is working for itself, to perform its own tasks, without being sufficiently aware of their interdependence in promoting integrity and combating corruption.

### *Promoting of integrity in the forefront*

In the Netherlands, most matters concerning anti-corruption and promotion of integrity are well laid down in law. Institutions are also sufficiently well-equipped to perform their own tasks. In addition to this strong for-

mal basis, the Dutch NIS is distinguished by the positive central message of promotion of integrity, while there is less attention to the negative message of combating corruption (Slingerland e.a., 2012a: 287). Various forms of fraud and bribery are penal offences in Dutch criminal law and many institutions are responsible for the enforcement of this. However, in general, the emphasis can be said to lie on prevention. For a number of years, for example, all government organisations have been required to pursue an integrity policy, including a code of conduct and attention to increasing integrity awareness. Self-regulation in the public and private sectors also focuses primarily on promoting integrity. A conscious choice was also made to form the Dutch National Integrity Office (BIOS),<sup>6</sup> rather than an Anti-Corruption Agency. This organisation supports government agencies in setting up and implementing their integrity policies. For example, BIOS organises an Integrity Day each year (National Integrity Office, 2015). Scientists, policy-makers and those involved with integrity in the public domain conduct talks with each other here.

Various studies show that it is primarily local government that is vulnerable to corruption (Veldhuisen & Snel, 2014: 45-46; Koster, 2014a; Koster, 2014b; Slingerland e.a., 2012a: 26). In the relatively small community of a town or village, administrators and people's representatives often 'wear different hats' and are active within the local social networks, as a result of which the risks of (the appearance of) conflicts of interest and corruption are lurking around every corner. The Netherlands does not have anti-corruption agencies and the local integrity offices can also be counted on the fingers of one hand. Amsterdam is one of the few Dutch cities with an Integrity Bureau (IB).<sup>7</sup> This Bureau has expertise in the field of integrity and its objective is to promote the integrity of the administrators and civil servants of the Amsterdam municipal authority. Among other things, it conducts integrity studies and risk analyses, and provides training courses. Citizens, politicians and civil servants can report suspicions of violations of integrity to the Integrity Violations Reporting Centre, which is part of the Bureau (Amsterdam municipal authority) (undated). The Netherlands has no civil society organisations which work for local integrity. Furthermore, local audit offices and local media do not always have sufficient capacity to monitor the local administration, while at the same time, more and more powers are delegated to municipal authorities due to the decentralisation in the field of healthcare.

Both central government and local authorities have now implemented local integrity policies. In the past, these policies were aimed primarily at civil servants. In recent years, local integrity policies have also been directed at holders of political office and councillors (National Integrity Office (undated); Koster, 2014a; Koster, 2014b). For example, integrity is included in the induction programmes for new municipal councillors. After elections, mayors may subject their candidate Aldermen to an integrity test. Consequently, the emphasis of the Dutch NIS lies primarily on the promotion of integrity and the prevention of corruption. Dutch criminal law has recently been amended and now imposes more severe penalties for corruption, but the criminal law is in every respect the *'ultimum remedium'*, which is reflected in the actions of the NIS institutions: prevention rather than repression.

### *Towards effective protection of whistleblowers*

The active promotion of integrity within Dutch public administration is qualified as positive in both the NIS study and in the Anti-Corruption Report of the European Commission (Slingerland e.a., 2012a: 289-290; European Commission, 2014a: 4). At the same time, the NIS study shows that the protection of whistleblowers is still inadequate, both on paper and in practice. Various institutions are involved in handling reports from whistleblowers, but their powers vary from merely advising whistleblowers to actually investigating abuses. Furthermore, some institutions can only be contacted by civil servants, while others are also authorised to handle reports by employees from the private sector (Slingerland e.a., 2012a: 115-116). Temporary reporting centres have also been set up in response to structural abuses within specific sectors. For example, the Netherlands has the 'Housing Corporations Integrity Reporting Centre' and the 'Temporary Integrity Reporting Centre for National Police Force Procurement and Contracting'.

Since 2012, the Netherlands has been working hard to improve the protection of whistleblowers. In July 2015, the 'House for Whistleblowers' Bill was adopted<sup>8</sup> unanimously. The House for Whistleblowers is to become a central institution where whistleblowers from both the public and private sectors can report abuses and that must guard against whistleblowers suffering difficulties as a result of their reports. The House can provide advice and has the competence to investigate. Its independence will be assured partly because the members of this House will be appointed by royal

decree.<sup>9</sup> Public organisations and companies will be required to set up internal regulations for handling integrity violations. If whistleblowers cannot obtain a response internally, they can contact the House for Whistleblowers. Nevertheless, various social organisations have expressed concerns about the House now to be set up (Transparency International Netherlands, 2015). For example, it is not clear how the House will offer adequate protection against reprisals resulting from the report. The inadequate protection for the self-employed, temporary workers and seconded persons after they make a report is also insufficiently thought-out. These organisations also call for segregation of the advisory and investigation functions of the House. The protection of whistleblowers is now high on the political agenda, but the fact that the wide variety of reporting centres could be perceived as non-transparent by whistleblowers, which could have the effect of raising the barriers to making a report, remains a point of concern. The House for Whistleblowers will advise the whistleblower on where to turn to.

### *Political parties under the microscope*

Political parties are a weaker pillar of the Dutch NIS (Slingerland e.a., 2012a: 212-217). Less than 3 percent of the Dutch population is a member of a political party, but nevertheless, these parties play an important role in Dutch society. Not only are people's representatives elected, in practice, via the line of political parties, but the key positions in the Dutch (semi-)public sector are also largely held by members of political parties (Slingerland & Wempe, 2013). The NIS study also found a serious lack of transparency in the field of the financing of political parties. As a result of this, donors (both individual persons and organisations) could exert and influence on the determination of the positions of political parties (Slingerland e.a., 2012a: 209-213). In 2013, the Political Parties (Financing) Act<sup>10</sup> was adopted, as a result of which donations, subsidies and debts must now be registered and published. This should make visible how the parties raise their funds, in order to avoid (the appearance of) conflicts of interest.

In addition to insight into the financing of political parties, Dutch political parties should account for the strong influence that they exert on the functioning of Dutch society. A number of national political parties have now created their own Integrity Committees, which party members can contact for advice or to report violations of integrity. This does not alter the fact that in the case of all political parties, either there is no clear

vision of their own integrity or this vision is not adequately translated into practice (GRECO, 2015: 11-12). Recent corruption cases in the Netherlands show that there is an urgent need for political parties to address the matter of integrity. It is precisely politicians and administrators who, together with civil servants and entrepreneurs, form part of networks, often local ones, where there is a risk that lobbying for certain interests could result in unfair competition and corruption (Slingerland & Wempe, 2013).

### Importance of system awareness among institutions

The NIS model shows what every institution contributes towards the embedding of integrity in a society in a formal sense. An official role is assigned to each institution, which is tested in practice. But what does it mean to form part of an NIS? As soon as we refer to a system, this implies that institutions do not operate entirely independently, but that a certain relationship and dependence exists between them (Slingerland, Six & Huberts, 2012b: 220-221). For every system, in order to be able to realise a certain objective, it is necessary that all actors have this same objective in mind (Meadows, 2008: 14). It is therefore a requirement that all central institutions in the NIS are aware of the role that they play in relation to the promotion of integrity. Integrity is a value, and that value must be named in laws and regulations and in policy. Even more important is that this objective should become visible in the actual actions of all parties. Precisely because a value is involved, its significance is time and context-dependent. Integrity can only be captured in laws and rules to a certain degree (Slingerland, Six & Huberts, 2012b: 233-236). The finding that the formal NIS is strong, is an encouraging conclusion. At the same time, it forces us to think through the concept of an NIS in more depth. An initial step would be to not to leave thinking and talking in terms of integrity systems to academics alone, but to ask the institutions and persons who work in them to consider themselves as part of this larger system, so that the awareness is embedded in the breadth. Which cog do they represent in this larger machine and which role do they actually play? In this way, a better understanding will be developed of the translation and functioning of the NIS in day-to-day practice.

In order to illustrate this distinction between the formal NIS (the model) and the actual NIS (the translation into practice), the role of political parties in Dutch society could be considered, for example. The NIS model assumes that political parties form an independent pillar and political

parties are therefore assessed in terms of aspects such as individual independence, transparency and integrity. At the same time, in practice, political parties are not an isolated pillar but also form part of other NIS institutions (Legislature, Executive, Civil Society and Business). A vote for a candidate of a political party, for example, results in the appointment of people's representatives and administrators, which form two separate institutions in the NIS. In addition, the influence of political parties in the Netherlands goes far beyond politics alone. (Former) administrators and politicians also play other roles in society, for instance as members of executive boards or supervisory boards in the (semi-)public or private sector (Slingerland & Wempe, 2013). In the NIS, these too are separate institutions. The role that political parties play in the NIS is consequently far greater than that shown on paper. In the Dutch situation, political parties play a key role in the NIS. As soon as these parties embrace their key role and take more responsibility for promoting integrity, many institutions will become (still) stronger and consequently, so will the NIS as a whole.

### Importance of embedding

It is precisely the interplay between these institutions and the way in which they interact that determine the protection of integrity in a society. A system is dynamic and is subject to many different influences (Meadows, 2008: 76-85). At the time of the economic crisis and the austerity measures that followed, for example, there were fears of the consequences that the crisis was expected to have on the actions of persons and organisations (Hoekstra, Hooegeveen & Zweegers, 2012). A NIS that functions well will be resilient enough to manage changes of this kind and corrective measures can be taken. This requires a system awareness among institutions and of everyone who works in these institutions. Matters that constitute a threat to integrity within or outside their own organisations must be raised. It is extremely important in this respect that organisations and officials work together, so that they can learn from and with each other and a picture is formed of what is happening beyond the boundaries of their own organisations. This type of informal exchange of experiences and the joint development of integrity instruments will then take place within external integrity networks (Hoekstra, 2014: 25). An example of this is the cooperation in the Netherlands between the different enforcement agencies (the police force, Rijksrecherche, the Fiscal Intelligence and Investigation Service (FIOD) and the Public Prosecution Service) in the detection of corruption.

The integrity policy described above is essential for this purpose. In addition to the fact that it is important for every civil servant, employee, administrator or people's representative to be aware of the specific integrity rules that apply, it is very important that continual attention is devoted to ethics and moral dilemmas. In this way, a moral compass develops for situations that are not encompassed by policy. Education and training play a crucial role in this. In the Netherlands, more and more professional training courses and educational institutes devote attention to integrity in their curricula. Through practical (investigation) assignments, students and employees come into contact with integrity dilemmas, which forces them to think about the values and interests at stake and the consequences of their actions in the short and longer term. This feeds the critical thinking, moral judgment and investigative attitude of everyone (Bildung), in particular also that of students: the integrity guardians of the future.

Actual embedding of integrity requires that, in addition to the tasks formally assigned to them, institutions also recognise their role in protecting a strong NIS. Cooperation with other institutions is a prerequisite for this. Rules of conduct and an integrity policy can contribute towards a strong NIS, provided that they are coupled with continual attention to integrity in education, in training programmes, during meetings and above all, in the discussions that everyone conducts with others on a daily basis. After all, integrity is a never-ending issue and stands or falls with its concretisation and discussion in day-to-day practice.

## Notes

- 1 [www.transparency.org](http://www.transparency.org)
- 2 [www.transparency.org/whatwedo/nis](http://www.transparency.org/whatwedo/nis)
- 3 Transparency International developed the NIS instrument in the 1990s with the aim of defining each country's exposure to corruption. It is a tool for qualitative research on the basis of primary and secondary literature, international reports and interviews with people working in the institutions studied or who have an insight into these. The NIS model is based on the metaphor of a Greek temple, for which the political-institutional, socio-political, socio-economic and socio-cultural foundations of a society form the base. On this foundation, the 13 pillars of a country are built: Legislature, Executive, Judiciary, Public Sector, Law Enforcement Agencies, Electoral Management Body, ombudsman, Supreme Audit Institution, Anti-Corruption Agency, Media, Civil Society, Political Parties and Business. These pillars each have their own, but also a shared responsibility for promoting integrity and controlling corruption. The extent to which this takes place is assessed on the basis of the criteria of facilities, independence, transparency, accountability, integrity and the

way in which the pillar performs its own role. The full Dutch NIS report is available on the TI website at [www.transparency.org/whatwedo/nisarticle/netherlands\\_2012](http://www.transparency.org/whatwedo/nisarticle/netherlands_2012), viewed on 29 July 2015.

- 4 [www.rekenkamer.nl](http://www.rekenkamer.nl)
- 5 [www.nationaleombudsman.nl](http://www.nationaleombudsman.nl)
- 6 [www.integriteitoverheid.nl](http://www.integriteitoverheid.nl)
- 7 [www.amsterdam.nl](http://www.amsterdam.nl)
- 8 Parliamentary Papers I 2014/15 34 105 A.
- 9 Kamerstukken II 2014/2015 34105 nr. 12
- 10 Political Parties (Financing) Act, in force on 17 July 2015.

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