

7 *Monitoring Integrity The development of an integral integrity monitor for public administration in the Netherlands*

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Introduction

The Dutch public administration is known for its high standards for integrity and the preventive scope of its integrity policies (EU Anti-corruption report, 2014). As early as 1992, integrity was placed on the political agenda by the Ministry of the Interior. This resulted in comprehensive integrity policies, including various laws and regulations (see Chapter 2). However, it took until 2004 before the Ministry conducted its first monitor of the formal implementation of integrity policies within the Dutch public administration, which was repeated in 2008. In 2012, the scope of the Integrity Monitor was expanded to include employee surveys. The main objective of the initiative to fully monitor both the policies and the perceptions of integrity (policies) is to enhance the attention to integrity in the organisational culture. At the same time, the Integrity Monitor fits into the broader desire for evidence-based policies. This chapter will first describe the development of monitoring integrity in the Netherlands, followed by a presentation of the survey results. The chapter concludes with a reflection on the strengths and weaknesses of the current monitoring process and looks forward to the revised monitor for 2016.¹

Usage of monitoring

Monitoring in general is descriptive in nature, collecting facts and statistics to show trends in certain areas, while evaluations are intended to measure the impact and effectiveness of interventions. The Dutch Integrity Monitor is primarily meant to describe a trend and provide a picture of the status of integrity policies and culture of Dutch public administration. The Integrity Monitor contains no theory to predict how policies initiated by the Ministry, or others, could influence the perceptions of integrity policies and culture. However, the results can still guide policy-makers in adjusting policies. The monitor is primarily used to

inform Parliament about the current status of integrity policies of the Dutch public administration and about the actions taken by the Minister of the Interior in response to the reported results. Another goal of the monitor is involving the decentralised public administrations in taking responsibility for complying with regulations for integrity policies and for enhancing ethical awareness. Also the associations of the decentralised government agencies (the Local Government Association, Union of Water Authorities and Association of Provinces) can use the result to sharpen their policies and provide support to organisations. Lastly, the monitoring results can be used for more in-depth secondary (academic) analyses. The breadth of the questioning in the integrity monitoring, including questionnaires for civil servants, political office holders, Council clerks and Director Secretaries provides a unique database for further research. The following paragraph describes the process of policy changes due to the subsequent Integrity monitors.

Monitoring integrity from 2004 until 2012

In 2004, in the wake of scandals and a renewed focus on the need for effective integrity policies, the Ministry published its first Integrity Monitor of the implementation of integrity policies among the four levels of public administration (Van Wonderen, 2004). This was a check-box inventory: do organisations have an integrity policy, and does it contain various soft and hard controls? The results showed a lack of implementation of policies. As the responsibility for integrity policies lay with individual organisations which are controlled by their local councils, all the results were published on the internet and could be searched by organisation. This level of transparency was rather unique and was not repeated with later monitoring, partly due to the extension of the survey to include perceptions of the respondents instead of factual questions only. Also, it was thought that respondents would give more honest responses once the results were not searchable by organisation.

After the formal changes of the Civil Servants Act and the formulation of the Basic Integrity Standards for Public Administration and the Police Force (both in 2006), the second monitor in 2008 focused on the implementation of the various aspects of integrity policy as required by law, regulations and other formal agreements. The results showed clear progress in the formal implementation of the policies; most elements of integrity management were implemented. For example, the number of

organisations that had a code of conduct rose from 65% in 2004 to 89% in 2007. Only a few requirements were implemented in less than two thirds of the organisations surveyed. The main examples were a yearly account of integrity policies for the representative body (35%), a regulation for reporting financial interests (49%) and a regulation for publication of secondary activities (59%), both of which should be targeted at specific civil servants (for example, management, procurement officers).

In 2006, the third integrity audit by the Netherlands Chamber of Audit showed - again - disappointing results. The rules were in place, but most of the time the implementation of formal preventive measures came no further than the paper it was written on. However, the Ministries objected to the focus on formal measures, which are easy to assess. They stated that their policies focused on organisational culture and awareness and the role of managers, which were assessed to a lesser extent in the audit.

The Ministry of the Interior took up the challenge by developing a staff survey to measure perceptions of integrity and integrity policies. The use of employee satisfaction surveys is common practice in Dutch public administration. The integrity survey was developed as part of the facilitative role of the Ministry. In 2003 the 'Internetspiegel' programme had been established by the Ministry of the Interior and Kingdom Relations with the intention of developing uniform surveys for government organisations, to enable them to benchmark and learn from each other at lower costs. The Internetspiegel Integrity Survey consists of multiple elements which measure the organisational policies (hard controls, general controls, soft controls) and elements which measure the desired effects (following rules, morally aware behaviour, ethical behaviour). The survey is based on the work of Treviño and Weaver (Treviño & Weaver, 2003).

2012: an integral Integrity Monitor

The aforementioned developments paved the way for new integrative monitoring. In 2010, the Ministry initiated a coordinated effort to monitor the integrity and integrity management of public administration. In an 'administrative agreement' with the associations of the decentralised tiers of government,² it was agreed to monitor the (perceptions of) integrity and integrity policy. With this agreement, the Ministry, together with the associations, indicated that securing integrity in the organisational culture is of the upmost importance.

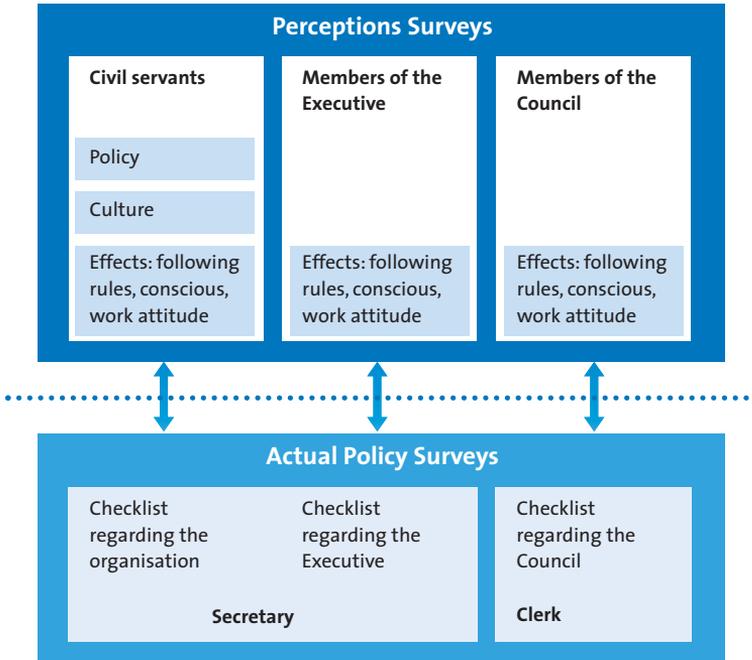
The Integrity Monitor 2012 consists of the following parts:

- Checklist of formal policies and inventory of the number of disciplinary cases or alleged integrity incidents to the secretary-directors and the clerks of the representative body.
- Perceptions study of integrity and integrity policy among civil servants and elected and appointed holders of political office (written survey, distributed by mail to enhance response rate).

In this way, for the first time, public administration could gain a coherent view of the current integrity policies, the perception of these policies and the integrity culture, and the number of incidents investigated. The checklist maps the formally implemented policies as prescribed in the Civil Servants Act and the Basic Standards. These were extended with elements of the Integrity Infrastructure of the Dutch National Integrity Office.³ They were extended to also include the perception of the secretary-director and the clerk of the priority given to integrity and integrity policies by appointed politicians and elected politicians.⁴ Also, for the first time, the Monitor included a perceptions survey of political office holders. The survey for civil servants was shortened and adapted to the executive and political context.

However, for reasons of privacy and enhancement of the response rates, the various surveys could not be linked to individual organisations, which is a serious limitation of the 2012 Monitor. This means that only general conclusions can be drawn about the relationships between developments in integrity policies, awareness of policies and organisational culture.

Figure The Integrity Monitor 2012 Model



The survey results

Checklist and perception of implementation of formal integrity policies

An overview of the results of the checklist survey conveys that most elements of integrity policies, as required by law and other formal agreements, have been implemented by the central government, provinces, municipalities, and water authorities. The results do show some variations between the levels of government, with central government being a front-runner in terms of implementation of policies, while municipalities lag somewhat behind. This is not surprising, as the majority of municipal authorities are relatively small organisations. The results also show some differences between policies implemented for civil servants, elected and appointed politicians. Both elected and appointed politicians are ahead with regard to providing overviews of secondary jobs, but trail behind with regard to the oath of office and confidential integrity counsellors. The latter is probably because politicians do not have an official employer who is obliged to appoint a confidential integrity counsellor.

Table 1 Implementation of formal integrity policies according to secretaries and clerks*

Type	Laws and Standards specified according to survey questions	For civil servants	For appointed politicians	For elected politicians
Law & Standards	General integrity policies			
	integrity policies laid down in writing	98%		
	code of conduct	97%	95%	97%
	oath of office (or solemn affirmation)	95%	75%	75%
	monitoring/evaluation of integrity policies in 2010/2011	54%		
	procedure for accepting trips abroad		81%	86%
Law	Integrity part of personnel policy			
	integrity involved in parts of the personnel policy	98-100%		
	integrity part of appraisal/assessment interviews	91%		
	integrity part of management or working meetings	82%		
	training and development (are part of the personnel policy)	54%	55%	69%
	attention for integrity, risks and moral awareness		95%	97%
Law & Standards	Procedure for reporting of misconduct			
	procedure for reporting of misconduct	97%		
	confidential integrity counsellor	92%	73%	71%
	access to independent body	63%		
	procedure for investigating misconduct/ integrity violations	60%		
Law & Standards	Conflict of interest regulations			
	regulation for reporting secondary jobs	98%		
	overview of secondary jobs	70%		
	mandatory disclosure of secondary jobs (for selected officials)	59%	98%	100%
	regulation for reporting financial interests	49%		
Standards	Vulnerable positions and processes			
	segregation of tasks or duties	83%		
	risk assessment of vulnerable positions and processes	43%		
	overview of vulnerable positions	28%		

* Where there is no percentage included, the question was not asked to either the secretary or clerk.

The table presents a mixed picture. Every aspect of the total integrity policies have elements that are generally implemented, while other elements that make implementation more specific, seem to lag behind.

For example, concerning civil servants, almost every organisation has integrity policies (98%) and a code of conduct (97%). At the same time whistleblower regulations and procedures providing access to an independent body (63%), procedures for disciplinary investigations (60%), the disclosure of secondary jobs (59%), regulations for financial interests (49%), and activities directed towards the identification of vulnerable positions (43%) are weakly developed.

For a correct interpretation of the results, it needs to be taken into consideration that these figures have been established on the basis of a self-evaluation, whereby social desirability in answering the questions has to be taken into account. More importantly, these figures say little about the quality of the measures taken. A subsequent analysis of actual integrity policy plans carried out by the Dutch National Integrity Office (Hoekstra, Makina & Talsma, 2013) showed that there are fewer organisations with a well-developed and formalised integrity policy plan than the self-evaluation suggests. Furthermore, we have asked civil servants in a survey to what extent they are aware of those policies being present and implemented in their organisation. Their awareness appears to be quite low on several aspects. Three-quarters of the respondents (74%) indicated to be aware of the existence of various procedures concerning integrity (for example, regarding secondary jobs, gifts and expense claims). However, to a much lesser extent are employees (47%) familiar with the general integrity policies, and only one in three (36%) indicated to be aware of the procedures with respect to dealing with suspicions of misconduct.

Table 2 Awareness of integrity policies and perceptions of organisational culture by civil servants

Type	Cluster	Total
Hard controls	regulations, code of conduct	74%
	procedures concerning dealing with violations	36%
General controls	integrity policies	47%
Soft controls	exemplary management	39%
	values and standards	65%
	cooperation with colleagues	78%
	fair treatment	57%
Outcomes	honest attitude towards work	88%
	moral awareness	66%
	non-compliance with rules (negative statements)	39%

Personnel integrity perceptions

In the end, integrity policies are aimed at producing outcomes. In the case of integrity policy, this means that the aim is to have high moral awareness among personnel and low figures for non-compliance with integrity rules. Nearly nine in ten of those surveyed (88%) think their colleagues do have an honest attitude towards work (the questions were phrased negatively, such as being dishonest about results, being non-productive during work, reporting sick).

Two in five employees (39%) reported that in their perception, certain integrity rules (six items, for example, concerning the acceptance of gifts or invitations, and dealing with confidential information) were sometimes not followed, although in terms of frequency this relates mainly to 'seldom', whereas only about 2% of the respondents thinks rules are broken 'frequently'.

Two thirds of the appointed and elected politicians state that their colleagues have an honest working attitude and moral awareness. This means that one third still see a lack of those elements among their colleagues and work still needs to be done to improve attitudes and awareness. Various instruments have been developed for that purpose (see Chapter 2).

The results of the 2012 survey among civil servants were compared with the surveys conducted in 2006. Remarkably, these showed no differences in results despite the increased attention to integrity in those years and the efforts of many organisations to strengthen the implementation of integrity policies. A possible explanation is that as integrity policies started in 1992, one could have expected clear changes in the administrative culture in the first years, which could then have stabilised in later years. There are, however, no data available for this time period to test such a hypothesis. Or that that changes have been made in some organisations but not in others. Due to that, on an intermediate sector level, no results can be seen. For future monitoring, it would be interesting to analyse differences in trends between organisations to see whether trends are visible on this meso level. Another more technical explanation might be that the surveys do not cover the subjects that have been changed due to the efforts made. It would be relevant to analyse whether different survey questions on integrity could show more variation in time. All these considerations are taken into account in the development of a revised Monitor for 2016.

Registration of disciplinary investigations

In the survey, senior management was asked how many disciplinary investigations were registered in 2011 and what kinds of (disciplinary) sanctions have been administered. The figures in Table 3 represent the breaches and sanctions that occurred in the civil service, presented per sector.

Table 3 Registered disciplinary investigations for the year 2011

	investigations	disciplinary dismissal	other disciplinary measures/actions	reporting to public prosecutor
Central Government	439	40	117	14
Municipalities	79	21	66	12
Provinces	8	2	14	2
Water Authorities	6	3	0	1
Total	532	66	197	29

As this is one of the first attempts in the Netherlands to collect such data, it may not come as a surprise that the quality of this data should be viewed critically. Because this is a survey, not all organisations have submitted data. Moreover, the table does not provide a complete overview, since almost a fifth (17-21%) of the senior officials surveyed were unable to state how many investigations were conducted and what sanctions had been applied. In those cases, registration was lacking, incomplete, or otherwise unclear. The Central Government has improved its registration since 2011 and provides the House of Representatives with an overview each year, in more detail:

Type of breach	Percentage of total breaches registered by Central Government in 2014 ⁵
Financial abuse	10%
Abuse of power/conflict of interest	5%
Leaking and abuse of information	5,5%
Abuse of competencies	2,5%
Abuse of enforcement powers	0,5%
Sexual harassment	8%
Misbehaviour in private life	28%
Violation of internal rules and misuse of company resources	40,5%
Total	100% (N=607)

Reflection

The Integrity Monitor is an initiative of the Ministry of the Interior in close cooperation with public administration sector organisations (Local Government Association, Union of Water Authorities and Association of Provinces) and the Dutch National Integrity Office. This co-production seems to work well. It ensures response rates, support for the results and the actions to be taken in terms to address weak areas, and at the same time emphasises organisational responsibility in this endeavour. The combination of surveys was successful, as it presented a more realistic image of the implementation of integrity policies within public administration.

However, there is also room for improvement to be taken into account for the Integrity Monitor 2015. First of all, the results of the surveys among clerks, secretaries, appointed and elected politicians and civil servants could not be combined for analyses of perceptions at the organisational level, as all surveys were anonymous. Furthermore, the questions for civil servants and the elected and appointed officials on the one hand and the questions for clerks and secretaries on the other, were not comparable. Therefore, it was not possible to make a good comparison of the *perceptions* on implementation of integrity policies and the actual implementation according to the clerks and secretaries. Thirdly, the method of gathering information on the number and types of integrity breaches and sanctions taken is insufficient and resulted in incomplete overviews.

For the Monitor 2016, some changes are being considered in order to increase the relevance for organisations, and for policy development. A major change could be that the monitor provides information on the organisational level. This will not only provide organisations with input for their integrity policy, but it would also facilitate analyses for identifying trends and risks at the organisational level. In addition, the monitor can be improved by extending the focus on organisational culture to include professional performance and values of civil servants and political office holders. Various studies have shown that integrity depends for a large part on general organisational culture factors. For example, how leadership is executed both ‘at the top’ and at the work floor, or the extent to which colleagues support each other. As the Ministry is not just responsible for enhancing integrity but for the quality of the public administration it would seem relevant to broaden the scope of the Monitor. It will also reduce research burdens on civil servants when several questionnaires can be integrated for a monitor with a broader scope.

In order to explore such a broad monitor, several meetings were held with experts on integrity, safe workplaces⁶ and organisational culture early 2016. The sessions resulted in four main items being an underlying factor for both integrity and safe workplaces. Those are: a healthy organisational culture, quality of leadership, meaningful implementation of policies and meaningful integration of integrity and safety policy with primary work processes. The expectation drawn from the sessions is that the inclusion of questions about these topics would result in a more meaningful explanation of changes through time and differences between organisations. Secondary analysis of current data on integrity, safe workplaces, organisational culture and leadership are planned to sharpen those hypotheses. This should result in an adaption of the questionnaires.

Lastly, the monitor could be improved by intensifying the information gathering on the number and types of breaches and sanctions. This could be done, for example, by interviewing clerks, secretaries and integrity officers by phone instead of sending them surveys.

In this chapter we have shown how, as the debate on integrity continues, the Integrity Monitor adapts to new developments and policy needs. The Monitor is actively used as a policy tool, as it indicates the focus of attention of the Ministry and other stakeholders. For example, the monitor of 2012 showed that registration of breaches is lacking. The Ministry subsequently made an effort to improve registration. Integrating integrity with a broader perspective on professional public administration and mainstreaming integrity within organisational policies remains a challenge for the coming years.

Notes

- 1 This chapter is adapted from Lamboo & Hoekstra, 2015
- 2 Association of Provincial Authorities (IPO), Association of Regional Water Authorities (UvW) and Association of Netherlands Municipalities (VNG), and in addition the Group of the Integrity Coordinators of the Ministries.
- 3 www.integriteitoverheid.nl
- 4 Appointed politicians in the Netherlands are the chairmen of water authorities, provinces and municipalities, and members of the boards, comparable with members of the cabinet: aldermen in municipalities, daily members for water authorities and representatives for provinces. In the Netherlands a 'dualistic' local government system is present, which means that appointed members of the boards are not part of the representative body, such as the municipal council, the general members for water authorities and State Members for provinces. Members of those bodies are referred to as 'elected politicians'.

- 5 Ministry of the Interior, 2015.
- 6 'Safe Workplaces' is a program by the ministry to reduce aggression and violence by citizens against public officials. On the topic of Safe Workplaces a monitor has been conducted since 2010 (every two years). For 2016, efforts are being made to combine the two monitors, to reduce research burdens for respondents and to explore whether both topics have similar underlying (explanatory) factors.

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