

8 An organisation with integrity: feasible or a question of ideals? *On the design of the integrity position within the Hellevoetsluis municipal authority*

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The municipality of Hellevoetsluis

The municipality of Hellevoetsluis lies about 30 kilometres south of Rotterdam and has a population of some 40,000. Despite the fact that the municipality of Hellevoetsluis cannot be counted among the larger Dutch cities in terms of population, it does have a unique and historical character as a fortress town on the Haringvliet inlet of the North Sea.

Management and organisation

The municipal executive (referred to as ‘the executive’ below) forms the day-to-day management of the municipal authority. It is responsible for drawing up and implementing the integrity policy. The executive also accounts to the municipal council for the integrity policy pursued. The municipal council, which is elected by the population every four years, supervises the executive and determines the frameworks within which the executive and the civil servants of the Hellevoetsluis municipal authority work. The municipal council therefore also has a role of laying down frameworks for and monitoring integrity. The mayor chairs both the municipal council and the executive. An amendment of the Municipalities Act will enter into force in the foreseeable future. As a result of this amendment, mayors will be assigned a statutory duty to promote administrative integrity within their own municipalities. The municipal secretary heads the municipal organisation. The municipal secretary is responsible for integrity within the official organisation. The municipal secretary steers the integrity coordinator. The organisation consists of eight departments. Hellevoetsluis municipal authority has about 240 employees.

The integrity policy and the integrity coordinator

Rules apply in the organisation of the municipal authority, with which civil servants and administrators must comply in the performance of their tasks. These rules are laid down in various regulations. However, there was no umbrella policy. Because of this, and due to the fact that this is required by the Civil Servants Act, the Hellevoetsluis municipal authority adopted an integral integrity policy in 2010.

At the same time as the adoption of the integrity policy, the executive appointed an integrity coordinator. At that time, the job of integrity coordinator was still a new type of position, and is therefore still in development. Government organisations realise the position in different ways. There are organisations which deploy a separate integrity office in the 'integrity' task field. Other organisations assign responsibility for the performance of tasks in the field of integrity to a personnel department. Yet other organisations appoint a separate official for this. The Dutch National Integrity Office (BIOS) offers integrity management training courses. These training courses are aimed at providing an insight into the role of an integrity officer. Attention is also devoted to rules and tools that an organisation needs in order to secure internal integrity. The courses teach participants to think more deeply about integrity within an organisation. The position of integrity coordinator has now existed in Hellevoetsluis for just over five years. It is a job that is always changing.

The tasks that the integrity coordinator performs are:

- Preparing and providing for the adoption of an integrity policy and keeping it up to date;
- Preparing a code of conduct and keeping it up to date;
- Informing new employees about how the integrity policy is organised. Notifying employees about the existence of current regulations; Providing information on the integrity reporting centre (I shall return to this in a moment) and the presence of confidential integrity counselor within the organisation;
- Supervising processes when (suspicions of) misconduct arise;
- Preparing and updating regulations describing how the municipal authority deals with (suspected) breaches of integrity;
- Creating awareness among employees by maintaining a discussion on integrity. Ensuring that integrity is on the agenda and remains so in talks within the departments;

- Conducting regular talks with confidential integrity counsellors on matters that relate to integrity;
- Maintaining contacts with the management on the subject of integrity. Offering support in discussions of the subject of integrity in a department;
- Setting up a regional network of colleagues in neighbouring municipalities in order to exchange knowledge and experience;
- Preparing annual reports and presenting these to the executive. With this annual report, the executive can inform the municipal council about the integrity policy pursued.

Key elements of integrity policy

Some of the tasks of the integrity coordinator described above are among the key elements of a good integrity policy. These key elements can be divided into substantive and process-related key elements.

Substantive key elements of integrity policy

New employees

An organisation with integrity starts with employees with integrity. A good recruitment policy is important in this regard. When a new employee is hired, a Certificate of Good Conduct (VOG) is always requested. This is a certificate issued by a screening authority of the Ministry of Security and Justice, showing that the past conduct of the future employee does not give rise to any objections to performing a specific task or job in society. For example, it is not desirable that someone who has been convicted of fraud in the past should hold a financial position. In addition, a new employee must provide a copy of his or her diploma. If this is required by the organisation, an employee may be asked to take part in an assessment. At the time when a new employee is appointed, he or she is invited to attend a meeting for new employees. During this meeting, the structure of the organisation is explained. A special moment is also included in order to explain the matter of 'integrity'. New employees are referred to the current regulations within the organisation. Attention is also devoted to the different officers in the field of integrity, so that the employee knows who he or she can contact with queries or comments on this. At the end of this day, new employees take the oath or pledge laid down in the Civil Servants Act. A civil servant who takes the oath or pledge swears or pledges that he or she will adhere to the rules of conduct with which a civil servant must comply. Administrators also take an oath or pledge. The difference be-

tween an oath and a pledge is primarily a religious difference. With an oath, the person swears on the Bible and by God, which is not the case for the pledge.

Code of conduct

An integrity policy that functions well starts with good manners. These manners are determined by answering the question of how we wish to treat each other. Can we call each other to account for behaviour? How do we communicate with each other? As soon as this is clear, you can work together on good service provision. In the Hellevoetsluis municipal authority, a code of conduct for civil servants has been adopted, as well as a code of conduct for administrators. A code of conduct contains the core values of an organisation and the standards with which employees and administrators of this organisation must comply. A code of conduct provides a clear framework for employees and administrators. It offers a guide at the moment that different interests have to be considered in order to take a decision on the action to be taken.

Creating awareness

All sorts of regulations exist in order to ensure that employees perform their jobs properly. The existence of these regulations is not enough. Far more important is that employees are aware that integrity is not just some vague concept. Integrity is an integral part of everyone's work. Everyone deals with integrity in the performance of their job. Integrity is woven into the day-to-day work of every civil servant, at every level. In Hellevoetsluis, all employees have taken part in an 'integrity' workshop. This forms a first step towards increasing awareness in the field of integrity. Because integrity must be protected and kept 'alive', once-only workshops are not enough. For that reason, after these workshops a start was made with an online learning environment. Regularly, employees are presented with an online dilemma. Employees are asked to take a position (anonymously) on the dilemmas presented. In this way, everyone is 'forced' to think about this subject. On the basis of the responses, a working package on integrity is developed twice a year for managers. This working package can be used for discussions of the subject during work meetings.

Procedural rules, integrity reporting centre and confidential integrity counsellors

In 2013, the executive adopted the procedural regulations to be followed in the event of suspected abuses. These regulations contain rules on how to deal with reports of suspected breaches of integrity. Adoption of these rules secures a uniform approach to (suspicions) of integrity violations. The rules offer employees a sense of confidence in the way in which a report by or about them will be handled. They state that employees can make reports to their supervisors, a confidential integrity counsellor for integrity or to the integrity reporting centre. They also record the procedure to be followed. The rules are public, so everyone can view them. One of the matters regulated in the rules on reporting abuses is the establishment of an integrity reporting centre. This reporting centre consists of four employees (including the integrity coordinator). The reporting centre handles reports and advises (on request and otherwise) the competent authority. All sorts of matters concerning integrity are discussed at the reporting centre. In this way, you support each other, and think together about issues or processes.

In addition to the existence of procedural regulations and an integrity reporting centre, two confidential integrity counsellors have been appointed within the Hellevoetsluis municipal authority. There is an internal confidential integrity counsellor. This is an employee of the organisation. There is also an external confidential integrity counsellor. This confidential integrity counsellor worked for the organisation in the past and therefore knows it well, but is no longer employed there. The confidential integrity counsellors have regular meetings with the integrity coordinator. At these meetings, they discuss matters that are related to integrity, such as the preparation of a code of conduct and the organisation of a workshop on integrity. In view of confidentiality requirements, and in order to ensure a clear allocation of roles, the substance of current investigations is not discussed. The confidential integrity counsellors are in no way involved in investigations into possible breaches of integrity. That is a task of the reporting centre.

Since the procedural regulations entered into force, a number of investigations have been conducted into possible breaches of integrity. In none of these cases has dereliction of duty been established on the grounds of which disciplinary measures needed to be imposed. It has been found,

among other things, that permanent attention to processes in the organisation is necessary. Good processes are essential for the creation of a safe working environment.

All investigations have been closed in writing. On a number of occasions, a (closing) meeting was held between those concerned. During such a meeting, the people involved can tell their own story. These meetings help to meet the desire to be heard. Such talks can also lead to understanding of a person's actions. If the situation allows for this, people can offer each other apologies. In this way, efforts are made to maintain relationships and restore trust. Such meetings are always led by a third party, such as a staff member of the reporting centre.

The reporting centre is also regularly asked for advice on different subjects. These may be simple questions, such as whether a bunch of flowers can be accepted as thanks for good cooperation, but they may also concern more complex matters, such as questions on ancillary activities of employees or administrators. The fact that growing numbers of employees are contacting the reporting centre to make reports or to ask for advice is a positive development.

Process-related key elements of integrity policy

Formalisation of the integrity policy

The first key element is to adopt an integrity policy and to keep it up to date. The way in which an organisation develops and adopts an integral integrity policy is not laid down in the Civil Servants Act. A good integrity policy contains more than a review of existing integrity regulations and the procedures of the organisation. A policy plan must be based on a clear vision and mission, and a strategy for realising these. The Hellevoetsluis municipal authority adopted such an integrity plan in 2010. The purpose of this plan is firstly to establish clear principles applying in relation to integrity for both civil servants and administrators. Secondly, the plan is aimed at drawing permanent attention to integrity and at continually steering for this in a preventive manner. The mission and vision relating to integrity are based on the standards and values of Hellevoetsluis municipal authority. These standards and values form the foundation of the integrity plan. They show how the municipal authority wishes to work and what it regards as important.

These values are translated into concrete standards. The majority of those standards have already been laid down in law in the Civil Servants Act and in the *Model Approach Basic Integrity Standards for Public Administration and the Police Force (Modelaanpak basishnormen integriteit openbaar bestuur en politie)*, April 2006. The Basic Standards contains the minimum conditions and integrity measures with which a government organisation must comply. The mission of the integrity policy in Hellevoetsluis is to comply with the basic standards and to maintain this.

Maintaining contacts

In order to perform the job of a integrity officer properly, it is important to provide for a good network; both an internal network within the officer's own organisation and an external network with fellow officers working for other organisations. Within a network, officers support each other by exchanging information and sharing knowledge and experience. A wide network contributes to good performance of the job.

In order to secure integrity, it is necessary to keep discussing this with each other. As an integrity officer, you need the support of the management for this. Together, you continually search for ways to draw integrity to the attention of employees and the management. One way to do this is to include the subject as a fixed item on the agenda for work meetings and to actually discuss this with each other. Another way to draw integrity to the attention of employees and the management is by organising meetings on integrity. Attendance of these meetings must not be optional. The management must state that attendance of these meetings is mandatory for everyone.

It is important for an integrity officer to adopt an active role in the search for ways to draw integrity to the attention of employees, and to sustain that attention. The administration and the management are responsible and as an integrity officer, you stimulate, motivate and support them with a clear vision and the accompanying tools (Zweegers & Hoekstra, 2013: 82-85). The integrity officer must ensure that he or she is sufficiently visible within the organisation. In addition to discussing the subject of integrity in their departments, managers must also convey that they regard the subject as important. It is also important to hold regular meetings with the confidential integrity counsellors in order to keep each other informed of current matters. It is good to know what the current issues are within an

organisation. You can steer for these (in policy terms) if necessary. Structural meetings with members of the integrity reporting centre are also valuable. Even at times when there are no (suspicions of) breaches of integrity, it is good to keep in contact with each other. For this reason, the integrity reporting centre meets every three months, in addition to incidental talks.

Apart from these internal contacts, it is worthwhile to maintain contacts with fellow integrity officers who work at other organisations. The exchange of knowledge and experience in this field contributes towards a good integrity policy. Knowledge is increased and at the moments when questions arise for which there is no answer within your own organisation, you can consult each other. For this reason, Hellevoetsluis municipal authority is working to set up a regional network of integrity officers.

Accountability

Each year, the integrity coordinator draws up an annual report. This annual report is presented to the executive. The executive can present the annual report to the municipal council. The annual report is intended to provide information on the progress and activities in the field of integrity in the preceding year. It also provides an insight into the number of reports made and the amount of advice that the reporting centre has provided. The annual report also looks forward to the plans and ambitions for the future.

Evaluation of the job after five years

As an integrity officer, you try to make people aware of their own responsibility for acting with integrity. You try to make people enthusiastic, and to encourage colleagues to contribute ideas, all with varying results. Integrity is not the favourite subject of many managers, or of many employees. It is often regarded as 'difficult'. Small benefits, such as free tickets to an event that you have organised or a Christmas hamper from a contractor who has carried out a large job for the municipal authority 'suddenly aren't allowed any more'. It takes an effort to make employees (and administrators) realise that a good integrity policy primarily brings them benefits; that it contributes to a safe working environment, in which everyone treats each other with respect. And in which everyone can be open and honest and can perform their work well in an enjoyable manner.

There are times when you just have to take a deep breath. When you wonder whether this job is still worth it. But if you then see steps being taken, you get positive responses from the organisation and the issue is coming to life, you recover your enthusiasm and motivation to provide for a sound and well-supported integrity policy.

As an integrity officer, it is good to build up a network of fellow officers in order to exchange knowledge and share experiences. BIOS organises meetings for integrity officers a number of times a year. Attendance of these meetings helps the officers to maintain a critical view of the integrity policy in the municipality of Hellevoetsluis. In addition to offering an opportunity to learn, attendance of these meetings also helps you to find new energy to continue at times when you are struggling with your mission to get the notion of integrity into someone's head. At such a meeting about 2.5 years ago, the participants were asked to briefly describe the role of an integrity officer. I recently re-read the text that I wrote at the time. I can still recall the feeling that I described at the time. Fortunately, I also recognise the growing interest.

The role of an integrity coordinator (March 2013):

'The loneliness of the integrity coordinator is marked by a search for kindred spirits. As an integrity coordinator, you are continually searching for people who are willing to contribute ideas on the subject of integrity. As an integrity coordinator, you are very keen for other people to regard the subject as just as important as you do. Unfortunately, that is very often not the case. You can send information on the subject. You can continue to say that you are keen to join talks in which the subject of integrity will be raised (which, by contrast, is very often the case). You can be nice, you can smile, you can continue to share information ... And then finally, you have the subject on the agenda! Then, due to lack of time, or because there are 'more important matters that really must come first', right away, it is the first to be cut from the agenda again. Very slowly, you see some progress, a growing interest in this subject. People increasingly get in touch with you for questions, information or just a chat about a subject that relates to integrity. It just takes patience, a lot of patience. But honestly ... it is worth the effort!'

The organisation with integrity as a feasible ideal

An organisation with complete integrity, where no misconduct ever occurs, is an idealistic picture. People work in organisations, and where people work, mistakes are made. Sometimes consciously, sometimes unconsciously. The power of a good integrity policy is reflected in an organisation that offers employees an opportunity to report misconduct 'safely'. On the one hand this leads to more reports, but on the other to an organisation with greater integrity and thus a good working environment. Hellevoetsluis municipal authority invests in integrity. At present, it has an up-to-date and widely supported integrity policy. Successes have been achieved in the past few years. In addition to the adoption of an integrity policy, employees have been trained. The subject receives structural attention. Clear rules have been established, which are followed if there is a suspicion of misconduct. A reporting centre has been set up, which employees can contact with questions. This reporting centre also provides for advice to the competent authority. A start has been made on setting up a regional network for the exchange of knowledge and experience. The confidential integrity counsellors have been trained and appointed as confidential integrity counsellors for undesirable conduct and integrity. Integrity has become a permanent item of the agenda for work meetings. The Management Team has also placed integrity on the agenda. Each year, the municipal council is informed about the policy pursued.

In addition to these successes, there are also points for improvement. One of these points for improvement is the code of conduct, which is due for an overhaul. This will be addressed in the foreseeable future. Attention must also be devoted to the visibility of the confidential integrity counsellors and the integrity reporting centre, so that everyone knows who he or she can contact. Continual attention must be paid to the subject of integrity. Integrity must become part of the mind-set of the employees. This will only be possible if the management sets a good example. As an integrity officer, you have to continually invest in this, so that attention for the subject does not fade away. In this way, an organisation with integrity, where people continually work to realise ideals, has become feasible.

Literature

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