

Guidelines for Integrity Projects

Guide to a preventive self-examination of
vulnerabilities within the public sector

part I

Ministry of the Interior and Kingdom Relations



Contents

	Summary	2
I	About the Guidelines	4
I.1	Revised Guidelines for Integrity Projects	4
I.2	Starting points of the Guidelines for Integrity Projects	5
I.3	The methodology in brief	6
I.4	Why the Guidelines for Integrity Projects?	9
2	About integrity in a general sense	11
2.1	Integrity and integrity policy	11
2.2	The special importance of integrity in the public sector	14
2.3	Why does integrity demand more attention these days?	15
2.4	Resistance capability	17

Summary

These Guidelines for Integrity Projects are a completely revised version of the paper 'Integrity Projects', brought out in 1996. The revision is partly based upon the experiences of several organisations within the civil service with the original guidelines. This has resulted in a user-friendly method tailored to the needs of the organisations, which can easily be applied by government organisations themselves, without external help. The procedures described in the Guidelines are first of all made-to-measure and easy. For example, instead of conducting a survey among the complete staff of an organisation, it is sufficient to have interviews with some employees.

Integrity has everything to do with social and professional interaction and co-operation between people, and with acting in compliance with the accepted values and standards. The dictionary uses the words 'honesty' and 'incorruptibility'. Integrity plays an essential role in the quality of an organisation and in how it appears to 'outsiders'.

The Guidelines consist of three parts. Part I explains why government organisations should seriously focus attention on integrity. Integrity incidents usually cause considerable damage to the image of organisations, as integrity also has everything to do with trust and reliability. Emotions and feelings play a major role in this respect. For this reason it is of great importance to prevent violations of the integrity of organisations or persons. These Guidelines will help you to do so.

The method described in the Guidelines helps to enhance the capability of your organisation to arm itself against violations of - or threats to - integrity. It is a preventive instrument for the identification of the vulnerable spots that are inherent in your organisation. Remember, every government organisation is vulnerable! The Guidelines therefore recommend several measures that may enhance the integrity of your organisation.

Integrity is a precondition for the citizens' confidence in the civil service. The integrity of the civil service is of vital importance to the proper functioning of our democratic legal order. The importance of integrity has even grown because of a number of developments within the civil service and society that involve an increased risk of integrity violations.

The capability of organisations to withstand these violations seems in most cases to be insufficient. In addition, a damaged organisation usually tends to hush up integrity-related misconduct and often fails to follow up incidents.

In paragraphs one to four of Part I the revision and starting points of the method that was presented in 1996 have been described. Much attention has also been paid to the consequences of an integrity project. Paragraphs five to eight concern themselves with general and current ideas about integrity.

The methodology described in Part II of the Guidelines for Integrity Projects consists, in brief, of the following elements: identification of vulnerabilities (stage A); assessment of an organisation's resistance capability to compensate for these vulnerabilities (stage B); and development of additional measures to enhance this resistance capability (stage C).

Part III provides you with a tool box, consisting of many check lists, examples and background information.

1 About the Guidelines

1.1 Revised Guidelines for Integrity Projects

In the early 1990s the Ministry of the Interior commissioned the then National Security Service (BVD) to develop a method to enable organisations in the public sector to gain insight into those parts of their organisation that were potentially vulnerable to violations of integrity. It should also help the organisations to arm themselves against such violations. The method was brought out in 1996, in the form of a guide entitled *'Integrity Projects; guidelines to enhance the integrity of your organisation.'*

The method has now successfully been applied at various levels of public administration, including ministries, provincial and municipal administrations, as well as within some police forces and the Public Prosecutions Department. The guidelines were even used abroad. In view of the good experiences with the guidelines and the fact that integrity was, is and will be considered a major quality requirement for the public service, it was decided to evaluate the guidelines and to bring out a new version. Valuable recommendations and experiences of users of the 'old' guidelines were incorporated into the new version.¹

The basic method on which the new Guidelines are based has remained unchanged. The set-up of the original method is still considered sound and workable. The three consecutive stages of the method have remained unchanged. Extra attention has now been paid, however, to the preparations to be made before actually starting the project. While in the old guide information was collected by means of an organisation-wide survey, the new guidelines use the less labour-intensive method of made-to-measure interviews. It was also decided to tailor the guidelines more specifically to the organisational structure, because this produces the best and most tangible short-term results. These Guidelines focus attention on the examination of vulnerable activities and organisational vulnerabilities. The latter category seems to be new, but this is only partly true. Part of the aspects concerned were already described in the old guidelines. See also paragraph 3.

The principle of self-examination, on which also the old Guidelines were based, has been maintained and enhanced in the new version. The new Guidelines enable the user to carry out the project (completely) on his own, which has become easier because

some practical instruments, background information and examples have been added. The user can easily apply the tools or let himself be inspired by the examples. The new Guidelines consist of three separate, but interrelated parts. Part I has a general character. It is primarily meant for the senior management of government organisations. It concerns itself with the concept of integrity in relation to the interests of an organisation and with the resistance capability of that organisation. Part II is principally meant for those who actually carry out the integrity project. It guides them through the three successive phases. (Obviously, Part I is also interesting for project leaders.) Part II gives many references to Part III, which contains background information, check lists and examples.

1.2 Starting points of the Guidelines for Integrity Projects

These Guidelines guide you step-by-step through an integrity project that helps you to identify the potentially vulnerable spots within your organisation. The project is based on three starting points.

First of all, it is a *preventive investigation*. The project is not focused on the detection of corruptible persons. It is not intended to test the personal integrity of the employees in any way. Its aim is to identify the potentially vulnerable spots within the organisation and to reduce their vulnerability in the future by various measures. In other words, to optimise the capability of the organisation to withstand temptations that might lead to integrity violations and to prevent integrity violations in the future.

It is a *self-examination*. This means that it is an organisation's own decision and responsibility to carry out the project. So the organisation itself should want it and implement it. The management commits itself to the implementation and the employees carry it out. It is also the organisation itself that determines the standards for the required level of integrity.

Experience has shown that the greater the involvement of an organisation in the actual implementation of the project,

- the more the management will feel responsible for it;
- the greater the chance that integrity awareness within the organisation will really sink in;
- the broader-based the support will be for the conclusions and recommendations;
- the greater the chance that these will actually be implemented.

Finally, the project is mainly focused on possible improvements to the *organisational structure*. So this is about rules, procedures, systems. In addition, but on a smaller scale, some indirect attention has been paid (in Part III, Stage C) to a number of other integrity-related instruments, such as codes of conduct, dilemma training and the official oath.

1.3 The methodology in brief

The methodology consists of three consecutive stages. The description of each stage includes references to practical tips and examples to be found in Part III of the Guidelines.

Prior to the first stage, the activities to be carried out before actually starting up the project have been described: the preparatory activities. These activities include matters like allocating the responsibilities for the project, forming a project group, introducing the project to the staff and composing a group of people to act as a sounding board. This is followed by the next three stages that form the essence of the project.

During Stage A an inventory is made of vulnerabilities. Firstly, the vulnerable activities should be identified. Vulnerable activities are activities in which the handling of, for example, money or sensitive information plays an important role. Secondly, insight should be gained into (aspects of) organisational vulnerability. Organisational vulnerability concerns situations or processes that may constitute a potential integrity risk, such as the selection of (possibly unreliable) personnel and additional functions held by employees (possibly leading to a conflict of interests). These vulnerabilities are identified as such by the senior managers themselves. In order to assess whether the potential vulnerabilities identified at stage A are actually vulnerable, at stage B an insight is gained into the existing resistance capability of the organisation. If the vulnerability appears to surpass the resistance capability, recommendations are made to enhance this capability (stage C).

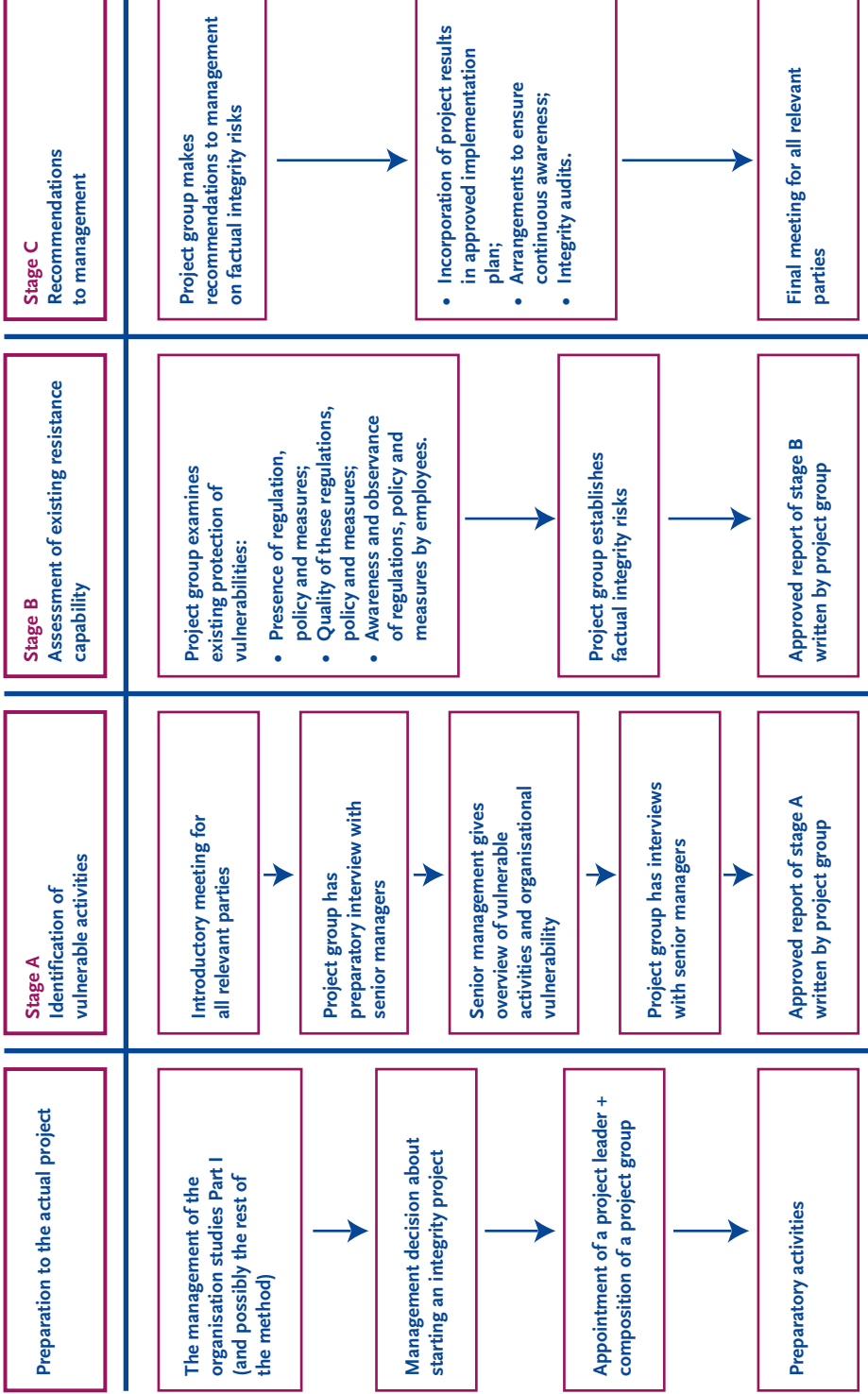
The methodology described in these Guidelines is mainly focused on gaining insight into the vulnerabilities within your organisation and on finding out what measures have been taken to arm the organisation against integrity violations. The resistance capability can mainly be assessed by examining what regulations, procedures and guidelines your organisation already uses and whether you already have some kind of integrity policy and/or relevant measures. If such is the case, you have made an important first step towards enhancing the integrity of your organisation.

But it is not enough. The integrity policy should be complemented and perfected, dependent on the nature and tasks of the organisation. To that end you may use additional instruments such as a code of conduct or dilemma training. Part III gives you some ideas for a possible follow-up of your integrity policy. An overview of the consecutive stages has been represented in the Integrity Project Diagram.

The implementation of the methodology described in these Guidelines is a first step towards enhancing an organisation's defence against integrity violations. Maintaining integrity, like maintaining a certain quality level, deserves permanent attention, however. So this first step is not enough. For this reason we recommend (as a second step) to check or re-examine your integrity policy on a regular basis by means of a so-called integrity audit.

Under the authority of the Ministry of Finance, a system for integrity audits has been developed.² Although these audits have been tailored to the needs of the central government, they may also be useful to other parts of the public service. We therefore warmly recommend this follow-up. It enables your organisation to keep withstanding possible integrity violations also in the future.

Integrity Project Diagram



1.4 Why the Guidelines for Integrity Projects?

The value of the methodology described in these Guidelines was amply proved at various government organisations in the past. It is a practical and workable method that can enhance the capability of your organisation to withstand integrity violations. The project can be carried out by your organisation itself, but before deciding to start it, you should be well aware of its possible impact on the organisation. The main consequences and points of interest are:

- In general, going through the complete project takes about one year.
- Sufficient support from both the management of the organisation and the administrative authorities is essential to the success of the project. The leadership of the organisation should be one hundred per cent behind the project, give it its full support and regularly propagate it within the organisation.
- In view of the delicate and rather unmanageable nature of the subject, it is necessary to appoint a strong project leader. It is also recommendable to make experienced and capable people within the organisation partly available for participation in the project group.
- Prior to actually starting a project, sufficient time should be spent on the preparation and on realistic planning.
- You should be prepared for the fact that the project may spark some commotion in the organisation. Incidents may crop up that divert the attention from the project. Proper communication is therefore of essential importance. It helps if the Works Council supports the project and is involved in it.
- An inadequate implementation of the project may very well have negative effects. You should be aware of this. After having explained to the staff why the project is important to the organisation, the management should make sure that the recommendations are actually followed up. If not, a certain cynicism among the staff might arise, and the employees may even attach less importance to integrity than before.

In short, prior to starting a project, it should be quite clear what implications the project may have for the organisation as a whole, both during the project itself and in the long term, when the results are clear. When weighing the pros and cons, you do not have to re-invent the wheel, however. In Part III of the Guidelines you can find much background information and many examples that may help you in the preparation and implementation of the project.

2 About integrity in a general sense

2.1 Integrity and integrity policy

It is of the utmost importance that both the executive and the political leaders responsible for government organisations realise that integrity is increasingly becoming a standard by which both their personal performance and the performance of the organisation as a whole are judged. Politicians, but also the citizens and the media make high demands upon the integrity of the civil service. Confidence in the civil service is directly related to its integrity. Recent incidents have shown that an organisation may easily be discredited once its integrity has been violated. In general, the ensuing damage to its reputation is substantial, while the efforts to win back betrayed confidence are in no proportion to the preventive efforts to reduce the risk of a loss of integrity: ‘An ounce of prevention is worth a pound of care’.

Unfortunately, however, a preventive integrity policy cannot completely secure an organisation against integrity violations. It can reduce the risk, however. A visible preventive policy may also influence the judgement of an integrity incident by outsiders. After all, a violation will be judged differently when the management of the organisation has demonstrably tried to reduce the risk of such incidents. The responsible leadership (and management) should be able to show the existence of relevant rules, procedures and mechanisms for supervision and control.³ The Guidelines for Integrity Projects, of which this is the general introductory part, may help in this respect.

The term integrity originates from Latin, its literal meaning is ‘not touch’ (in tangere).⁴ So it refers to something that or someone who ‘has not been touched’ in the sense of being unaffected, untarnished, unblemished or intact. Integrity is an important quality aspect in every organisation. In addition to effectiveness, efficiency and a client-oriented attitude, integrity is increasingly seen as an essential precondition to the proper functioning of the public service. The combination of these qualities determines the quality of an organisation. Whether and to what extent a government organisation is prepared to invest in integrity depends on how much importance it attaches to this quality, along with the wish to prevent damage to its reputation.

Integrity concerns the interaction and co-operation between people.⁵ Working with or for the civil service involves certain values and standards. Civil servants should behave according to the letter and the spirit of these values and standards. This means that they have to comply with the prevailing laws and the applicable rules and procedures (lawfulness), that they handle government property and resources carefully, economically and sensibly (efficiency), that their behaviour should be impartial, objective and just (neutrality) and that they take full responsibility for their words and actions (professional responsibility). Being ‘a good civil servant’ involves all these elements.

An incorruptible public service is essential to the proper functioning of our democratic legal order. A number of developments within the public sector and society and the interaction between them have increased the risk of integrity violations. Certain mechanisms within government organisations often affect the (natural) resistance capability of these organisations in such a way that this capability has become insufficient. See also paragraph 2.4.

This means that measures and a specific policy are required in order to enhance the natural resistance of organisations against violations of integrity. An organisation that seriously wishes to work on integrity should have a wide-ranging and varying integrity policy. This will never be a once-only operation, but it will always require more or less permanent efforts from the organisation. The then Minister of the Interior of the Netherlands, Mrs Ien Dales, gave the initial impetus to such efforts by explicitly pointing out that integrity required a policy:

‘The viewpoint that this is just about incidents may obscure the realisation that abuse of power is an insidious virus that may lodge in the structure of the public service and become a breeding ground for abuse of office. Combating this phenomenon requires more than just an ad-hoc policy. It requires permanent vigilance from the political top and senior civil servants, both in central and local government bodies.’⁶

Organisation and individual

A complete and effective integrity policy is focused on both the structure and culture of an organisation and on the integrity of the individual employees. It should cover both the compliance with rules and the stimulation of responsibility and awareness.

It is necessary, on the one hand, to develop and observe clear rules, guidelines and codes within an organisation in order to arm that organisation against integrity

violations. In the personal sphere the selection of personnel and sanctioning play an important role. Both aspects are relevant to the compliance-related side of the integrity policy. On the other hand, it is impossible to cover every type of appropriate behaviour by rules, guidelines or codes. After all, new or very complex situations that have not (yet) been covered by rules may always crop up. In these situations the employees should have the proper moral competencies on the basis of which they can independently – but in line with the organisation - take well-considered and sensible decisions.⁷

Moral competence is a quality that can be enhanced and stimulated by means of, for example, dilemma training. The provision of information about integrity questions also increases awareness. An open-minded culture in which people feel no inhibitions to make mistakes and to discuss (private) problems is also very important. Finally, we recommend to appoint an integrity co-ordinator who co-ordinates the various activities and who can tell the employees how and where to report suspected integrity violations, if any. In this context it would also be advisable to appoint an integrity counsellor (see Part III).

The table below distinguishes four different aspects of an integrity policy.⁸

Aspects of integrity policy

	Compliance	Stimulation
Organisation-oriented integrity	Morally defensible organisational structure	Sense of responsibility
Person-oriented integrity	Selection of personnel and sanction policy	Moral competence

In brief, an effective integrity policy consists of a combination of various types of instruments covering the entire range of integrity-related aspects. This combination may be different for each organisation, while also the time schedule may differ.

It is advisable to start with making an inventory of the most vulnerable spots in the organisation and with developing, laying down and checking the rules, procedures and guidelines that may enhance the resistance capability. This is a first step towards ‘covering’ the most urgent vulnerabilities within an organisation, both those that may arise occasionally and those that are inherent in the organisation.

The method described in these Guidelines is specifically focused on the latter category.

The next step is to reduce the vulnerability of the area that cannot be covered by these rules and procedures. To that end stimulating instruments like culture-oriented consciousness-raising programmes and moral dilemma training can be very helpful. Although the Guidelines are not primarily focused on these instruments, some of them have briefly been described in Part III.

Civil servants and administration

Obviously, an integrity policy cannot just be focused on the civil servants working at a certain organisation. It is extremely important that it is also focused on the administrative authorities responsible for that organisation. When the integrity of the administrators is in dispute, it affects the confidence in and the legitimacy of public administration.⁹ Administrators should not just be the figurehead of their organisation, but they should also set an example to the civil servants. They should be the epitome of integrity. As soon as administrators get mixed up in fishy business, this will entail dubious behaviour at the working level of the organisation. But administrators obviously also have an external function; they represent the government body for which they are responsible. This means that the integrity of the individual administrators directly reflects upon the integrity of the organisation as a whole.

2.2 The special importance of integrity in the public sector

Integrity is not only a major requirement in the public service, it is also a valued quality in the private sector and in social interaction between citizens. But where the public sector is concerned, integrity has an extra dimension. The fact is that citizens are largely dependent on government actions. Government institutions have many specific powers that may directly influence the life of the citizens. And in that capacity the civil service often has a monopoly position. Government organisations issue licences, collect taxes, grant allowances, supervise the compliance with regulations, impose punishment if necessary, etc. These actions are meant to ensure safety, to facilitate life for the citizens and to protect them against inappropriate actions by others. For this reason high demands are made to the quality of public administration and the quality of those who are working under its responsibility. Corruption in the public sector also has a negative effect on the spontaneous preparedness of citizens to comply with mandatory and prohibitory provisions. In that sense the integrity of the civil service is a precondition for the acceptance of government authority and for the compliance with laws and regulations. It is because of this influence, the monopoly position and the fact

that government actions are financed by tax money that the public service has to meet special requirements. Integrity is an essential part of these requirements.

A corruptible government loses the confidence of the citizens and thus its legitimacy. In this context legitimacy is closely connected with the general acceptance of government authority. A democracy cannot function without confidence and legitimacy. Such a situation might eventually endanger the democratic legal order, with all its consequences. The Minister of the Interior commented in 1992 that:

'... a violation of the integrity of the public service means no less than that the citizens lose confidence in public administration. And democracy cannot function without the confidence of the citizens. It would be the end of democracy. That is a depressing thought.'

Three characteristic principles augmenting the damage of an integrity violation even add to the importance of integrity.

- an integrity incident within one government organisation will soon reflect upon other organisations in the public sector, as a consequence of which the citizens may lose confidence in the civil service as a whole (the spill-over effect);
- 'minor' integrity violations usually lead to more serious ones, at least when not duly checked (the principle of the sliding scale);
- dishonest or corruptible behaviour by one or two employees - if not checked by corrective measures - triggers similar behaviour by others (the principle of infection).

2.3 Why does integrity demand more attention these days?

Does the growing attention for integrity mean that the Netherlands should worry about its civil service? Is there a moral decline in public administration? It is difficult to answer these questions in the affirmative or the negative.¹⁰ Anyway, there are certain tendencies that complicate the functioning of politicians and civil servants. Over the past few decades much has changed within the public sector and within society as a whole. Various developments have led to new procedures within the civil service and have changed the relations between the political domain, the civil service and society. These developments have added to the increasing importance of integrity within public administration. They can be sketched as follows:

- Society has become more complex. Values and standards seem to have become multi-interpretable and to provide less clear-cut (generally applicable) guidelines for behaviour;
- Because of the growing complexity and diversity of public duties, it has become impossible to cover all activities of the civil service by rules and legislation. Civil servants should have some scope for making their own decisions and judgements, they should be dynamic, flexible and creative, and their work should be focused on finding solutions. More and more responsibilities are being delegated, and the civil service is getting more scope, freedom and powers. This implies that civil servants should be competent, have a sense of responsibility and standards and be capable of making fair, honourable and professional decisions within this scope;
- The civil service is acting increasingly like a normal market party. On the market, however, other standards and values apply than within the public sector. Civil servants who are acting on or close to the market may be exposed to the temptations of the world of copious business dinners, study trips to far-off countries, generous Christmas hampers and ... services that are required in return;
- Over the past few years, a large number of government organisations have been more or less disconnected from the public service to be partly privatised. This has caused a fragmentation of the central values and standards of the civil service, which have become subject to the individual preferences of managers. In addition, a business-oriented government organisation has an enterprising character, which sometimes implies that certain risks (with tax money) are taken;
- The civil service has established relations with more and more other actors in order to generate expertise, money and support. It has, for example, involved private companies in so-called public-private partnerships and citizens in interactive policy-making procedures;
- The influence of civil servants ('the fourth power') has grown, because they operate more publicly and have direct contacts with citizens and social organisations;
- The media ('the fifth power') have become much more critical of the performance of the civil service. This means that they follow the behaviour of civil servants and administrators much more closely than before. Civil servants do not only find themselves in a 'transparent fish bowl', but the media go over everything they do with a fine-tooth comb and blow up every possible mistake;
- Over the past few years, government organisations have hired more and more people on a (temporary) contract basis. Employees in the civil service seem to feel less commitment and to be less aware of the special position of a public servant. Ongoing staff changes have given the culture within the civil service a volatile character, which jeopardises the stability of this culture;¹¹

- Globalisation has prompted national government services to operate increasingly within complex and not very transparent international co-operation groups.

This list of developments that make it difficult to maintain the integrity of public administration 'on all fronts' is far from exhaustive. One or a few of these developments do not necessarily lead to violations of the integrity of the public service. All in all, a climate seems to be arising in which the government has to meet more and more wide-ranging and sometimes contradictory standards and values. This has made the civil service more vulnerable to integrity-related risks.

2.4 Resistance capability

The natural capability of organisations to withstand integrity violations can usually be improved. Improvements may be realised in the field of internal regulations, procedures, measures and policy. This subject is described in detail in Part II. Characteristic of dishonest or corruptible behaviour - and thus an impediment to the resistance capability - is the fact that people usually tend to hush up dishonest or corruptible behaviour. The fact that a person who commits a violation (the perpetrator) keeps his mouth shut about it is self-evident. It is in his own interest to hush it up, because otherwise he would in all probability be faced with disciplinary measures or, in serious cases, even be fired. But also an organisation that has been compromised (the victim) is usually reluctant to admit and tackle integrity-related problems. When these problems get out, it will anyway damage the organisation. People are quick to conclude that the organisation is corrupt and its staff unreliable, while the leadership of the organisation is blamed for having failed to take adequate measures to prevent such behaviour. For that reason the management of such an organisation is usually inclined to declare that 'there is nothing wrong here'.

Organisations tend to keep up a pretence of integrity as long as possible. If suspicions arise about an integrity problem, their first reaction is usually to deny it. In practice, a person who notices a possible integrity violation often fails to find a ready ear within the organisation. On the contrary, the whistleblower is often treated as the proverbial messenger of bad news. In many cases organisations fail to take appropriate measures when they notice signs of corruption among their employees. It is often assumed that tackling the problem will spark great commotion and that it will only add to the damage to the organisation, particularly when high-ranked employees are involved.

- ¹ During the development of the revised Guidelines for Integrity Projects, an group consisting of a number of external experts (in the field of practice, policy and science) acted as a sounding board and gave advice to an AIVD working group.
- ² Ministry of Finance (2003), Integriteit bij het Rijk; een handreiking voor een audit.
- ³ Heuvel, J.H.J. van den, Huberts, L.W.J.C., Verberk, S. (2002). Het morele gezicht van de overheid; waarden, normen en beleid. P, 38. Utrecht: Lemma BV.
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- ⁷ Karssing E.d. (2000). Morele competentie in organisaties. Assen: Van Gorcum.
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- ⁹ Integriteit van bestuurders bij gemeenten en provincies; een handreiking. A joint publication of the Association of Netherlands Municipalities, the Interprovincial Consultation Group and the Ministry of the Interior and Kingdom Relations. The Hague (October 2001).
- ¹⁰ Bovens, M. (1996) De integriteit van de bedrijfsmatige overheid. In: Bovens, M. en Hemrijck, A. (red.), Het verhaal van de moraal. Een empirisch onderzoek naar de sociale bedding van morele bindingen. Amsterdam: Boom.
- ¹¹ Hoetjes, B.J.S. (2000) De krekbare overheid; Essays about integrity in the Netherlands, pp. 104-106. Utrecht: Lemma.

Questions about these Guidelines for Integrity Projects?

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