

# The Netherlands: Developments in Monitoring Integrity in Public Administration

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## Introduction

The Dutch public administration is known for its high standards of integrity and the preventative scope of its integrity policies (European Commission 2014). As early as 1992, integrity was put high on the political agenda when the then Minister of the Interior, Ms Ien Dales, gave a ground-breaking speech before a yearly conference of the Dutch municipalities. This resulted in the formulation of comprehensive integrity policies, various laws and regulations. However, it took until 2004 before the Ministry monitored, for the first time, the formal implementation of integrity policies within the Dutch public administration. This was repeated in 2008. In 2012, the scope of the monitor was expanded to include employee surveys. The main objective of monitoring both the integrity policies themselves and common perception of these policies is to get a better grip on the level of integrity within the different organisations. At the same time, the Integrity Monitor fits into a broader wish to formulate evidence-based policies.

The focus of this case study will be the Integrity Monitor of 2012. First we will present the role of key players within the Dutch National Integrity System and a short history of how the integrity policies, and the way in which they are monitored, have been developed within the Dutch public administration. Integrity policies concerning elected or political appointed officials are also monitored, but these results are not discussed in this case study.

## Key players in the National Integrity System

The responsibility for safeguarding the integrity of public officials is divided between several key players in the Netherlands. Most importantly, the Ministry of the Interior and Kingdom Relations which is responsible for strengthening integrity through preventive policies; and the Ministry of Justice, for fighting corruption through criminal policies. In addition to these bodies, external

control exercised over the central government by the Netherlands Court of Audits<sup>1</sup> has, from the beginning, played a significant role in addressing the effectiveness of integrity policies and stimulating new policies through audits of the central government.

In 2006, the minister of the Interior and Kingdom Relations established the National Integrity Office (BIOS) to support public sector organisations in their efforts to organise, manage, and implement effective integrity policies. To this end, BIOS develops practical instruments; disseminates integrity-related knowledge; connects policy makers, practitioners and scholars by hosting a variety of conferences and workshops; and conducts academic research. Since 2015, BIOS also has a helpdesk for local governments providing advice on how to deal with integrity breaches by political officials. BIOS does not conduct integrity investigations. Its role is purely supportive.

The Ministry of the Interior and Kingdom Relations has a general responsibility for the quality of public administration. As Dutch public administration – currently consisting of 11 Ministries, 12 provinces, 393 municipalities, approximately 25 Water Authorities and various central public organisations<sup>2</sup> – is decentralised, the individual organisations are autonomous. Also on a central level, the individual ministries are autonomous in their organisational policies. The minister of the Interior and Kingdom Relations fulfils a more supra-sectorial, coordinating role, and makes sure the laws, rules, codes, and instruments are in place for organisations to carry out their responsibilities. For integrity policies, the main legal instrument is the Civil Servants Act. Most provisions within this Act require interpretation in sector regulations or by the local authorities. As integrity is linked with the quality of public administration, the potential scope of integrity policies is wide and goes beyond the prevention of fraud, corruption and conflict of interests, to include issues such as the correct use of official powers and information, correct dealings with colleagues and citizens, and any conduct that might damage the public office.

Because of this decentralised system, the Ministry has almost no formal powers to enforce actual implementation by intervention. It must rely on more informal means; one of which is the power of knowledge and persuasion. For this, the Ministry gathers structural information on all aspects of the quality of the public administration

## Development of integrity policies<sup>3</sup>

Before 1992, the general idea in the Netherlands was that corruption was not a real problem. A wake-up call came in the early 1990s from indications that criminal organisations were attempting to infiltrate Dutch government and police forces, several incidents in which confidential political information was leaked and, most importantly, incidents of large-scale corruption and fraud between the construction sector and municipalities in the Southern Province of Limburg became public (Dohmen 1996; Dohmen and Verlaan 2003). This resulted in a speech by the then Minister of the Interior Ms Dales who framed integrity in absolute terms (see Dales 1994). According to her, ‘the government has integrity or not. You cannot have a bit of integrity.’ Integrity was about more than preventing fraud and corruption; it was also about what she called ‘the decay of power’. Her speech was critically received by the municipalities and the public administration as it seemed to imply that the Dutch public administration was corrupt. The Minister then stated that the Dutch public administration generally adheres to high standards of integrity, but in light of the democratic rule of law, the issue of integrity requires active and conscious attention. Since then, these views have formed the basis of all integrity policies carried out by the Ministry of the Interior. Initially this was done by focusing on the responsibilities of organisations to assess and address their risks and vulnerabilities as part of their general operational policies (personnel, finance, administrative procedures etc.), which included attention to the culture of an organisation and the awareness among public officials concerning the boundaries of proper conduct. The Ministry of the Interior reported yearly to Parliament about the developments on integrity policies within the central government and the police (the two sectors for which it carried direct responsibilities), and the wider public administration (provinces, municipalities and the Water Authorities). Under pressure of Parliament and the critical audits of 1996 and 1999 by the Netherlands Court of Audit, which demanded more central and structural policies, provisions were introduced in 1997 and 2003 in the Civil Servants Act obliging governmental organisations to regulate conflict of interests.

In the years around 2000, the Netherlands was once again faced by a series of scandals relating to fraud within the public sector and new – this time nationwide – corruption, fraud and price-fixing scandals within the construction sector, which resulted in a Parliamentary inquiry (2002). Although no apparent bribery took place, it was clear that high officials were at least passive in the face of these practices. Some even stated that the Netherlands had become a fraudulent country. The Prime Minister started a national debate on public morals.

As a result, the responsibilities of the public administration concerning integrity policies were formulated more explicitly by the Ministry of the Interior in a comprehensive national integrity policy presented to Parliament in 2003.<sup>4</sup> It was in this context that the first Integrity Monitor was introduced in 2004. The new focus on integrity was further put into effect through a formal ‘administrative agreement’ between the Ministry and the decentralised public administrations, the ‘basic norms for integrity policies for the public administration’, also called the integrity standards (published 2006). At the same time, principal changes in the Civil Servants Act came into effect in March 2006. Most importantly, the new provisions in the Act obliged all organisations falling under the Civil Servants Act to have an integrity policy, to have a Code of Conduct, and the Oath of Office was reintroduced after its abolition some years earlier.

## Monitoring Integrity: 2004-2012

The development of the monitoring system went through different stages, building up towards an integral Integrity Monitor in 2012. Integrity is not only an issue for the public administration (i.e. ministries and decentralised bodies), but is also integrated factual implementation with perceptions of implementation and perceptions on the organisational culture.

### Check-box inventories

In 2004, the Ministry published its first Integrity Monitor of the implementation of integrity policies at the four levels of public administration (MinBZK 2004). It was a check-box inventory designed to assess if organisations have the required elements of the integrity policies in place. The results showed a lack in the implementation of policies. As the responsibility for integrity policies lies with the individual organisations, which are, in turn, controlled by their local council, all the results were published on the Internet and were searchable by organisation. This level of transparency was rather unique and not repeated with later monitoring, partly due to the extension of the survey to

include perceptions of the respondents instead of only factual questions.

After changes to the Civil Servants Act and the formulation of the standards for integrity policies, the second Monitor in 2008 focused more 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 policies had been implemented.

### Development of an employee survey on integrity

In 2006, the third integrity audit by the Netherlands Court of Audits once again showed disappointing results. The rules were in place, but most of the time the implementation of these formal preventative measures went no further than the paper they were written on. However, the Ministries objected to the focus on formal measures that were easy to measure. They stated that their policies focused on the culture of the organisation, fostering awareness and the role of managers, which were, to a lesser extent, measured in the audit.

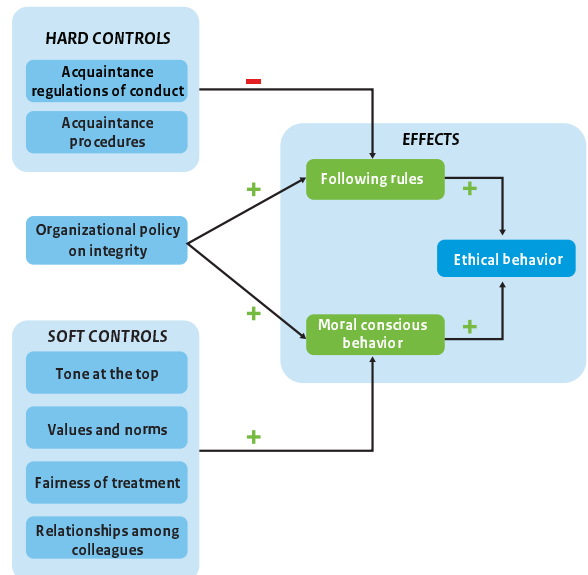
The Ministry of the Interior rose to the challenge by developing a staff survey to measure perceptions of integrity and integrity policies. The use of employee satisfaction surveys is common practice within the Dutch public administration. The survey was developed as part of the facilitative role of the Ministry. In 2003, the programme 'Internetspiegel' had been established by the Ministry of BZK, with the intention to develop uniform surveys for government organisations to enable them to benchmark and learn from each other at lower costs.

The employee survey on integrity and integrity policies was tested in 2006. At the same time, seven questions concerning integrity became part of the bi-annual, general personnel satisfaction survey (called POMO) in an attempt to gain information on integrity that could be used to evaluate the effectiveness of the integrity policies.<sup>5</sup> The results of the two surveys were combined in a report and sent to Parliament, stating that the level of integrity within many organisations' cultures was shockingly low. One of the headline results was that ten percent of the respondents had little confidence in the integrity of their manager.<sup>6</sup>

### Content of the employee survey on integrity and integrity policy

The Internetspiegel Integrity Survey consists of multiple elements that measure an organisation's policies (hard controls, organisational policy on integrity, soft controls), and elements that measure the desired effects (following rules, morally conscious behaviour, ethical behaviour). The survey is based on the work of Treviño and Weaver (2003).

Figure 1: Model of the Integrity employee survey



1. In order to measure hard controls, the questions focus on the respondents' awareness of existing regulations and the procedures for the reporting and handling of incidents in their organisation.
2. To measure the perception of the organisation's policies on integrity, positively formulated statements are used. As an example: Employees are adequately informed about all aspects of the organisation's integrity policies.
3. For the measurement of soft controls, four validated constructs are used – tone at the top, values and norms, fairness of treatment, relationships amongst colleagues. It includes questions that can be found in many employee satisfaction surveys as they reflect on the general culture, which has a clear relation to employee satisfaction. Examples are: Management upholds ethical standards in its decision-making, my colleagues know and understand the values and norms in my organisation, my immediate supervisor treats employees with respect, my colleagues help me to get the job done.
4. Following rules and exercising morally-conscious behaviour are two aspects that should contribute to an ethical attitude to work. Examples of questions are:
  - Following rules: How often have you come across the following kinds of behaviour in your immediate work environment this past year? Accepting invitations for events, dinners etc. that are not relevant to the organisation?

- Moral conscious behaviour: My colleagues are perfectly aware of the consequences of their actions.
- Ethical attitude to work: My colleagues do not take responsibility for the results of their work.

Some questions do not refer to respondents' own behaviour but instead, to behaviour they observed around them. This is in order to reduce the possibility of a social desirability bias. Nonetheless, these questions sometimes met with critical reactions by managers who associated these kinds of questions with 'reporting' on colleagues.

### Improvement of the registration of disciplinary cases

In 2005, the reports of the National Court of Audit (Algemene Rekenkamer 2005), the Vrije Universiteit Amsterdam (Huberts and Nelen 2005) and GRECO (2005) concluded that the Dutch public administration lacked insight into the number and type of disciplinary investigations. Ministry of the Interior and Kingdom Relations took on this critique and developed a model for the uniform registration of disciplinary cases (2007), although this was not always followed by the Ministry.

The experiences of the central government are a showcase for developments in registration. Already for some years, central government had included the number of disciplinary cases in the yearly report on personnel and governance. The increased coordination between the ministries in policy matters, including integrity and the attention for (uniform) registration, resulted in a sharp increase of the number of registered disciplinary cases to approximately 500 confirmed cases of disciplinary infringements a year. In 2010, the registration was further expanded to include both reports and investigations, resulting in approximately 1000 registered reports of possible misconduct. These numbers have remained fairly stable in the years 2008-2013. Overall, they show that the ministries take integrity seriously, not only through preventative policies, but also in their disciplinary consequences.

## A comprehensive Integrity Monitor: 2012

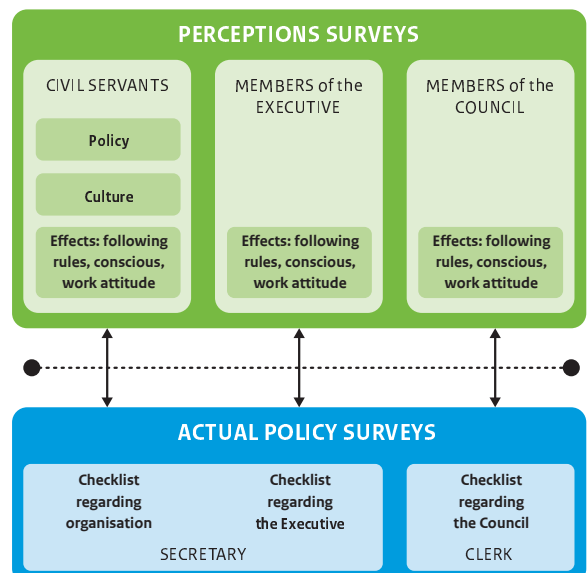
The aforementioned developments paved the way for new integrative monitoring. Firstly, the Court of Audits broadened the scope of their fourth audit on the effectiveness of integrity policies of the ministries, resulting in a report (2010) that included a survey among the civil servants of the ministries.

The ministry initiated a coordinated effort to monitor the integrity and integrity management of the public administration. In an 'administrative agreement' with the associations of the decentralised governments<sup>7</sup>, it was agreed to monitor (perception of) integrity and integrity policy, indicating that securing integrity within organisations is of the utmost importance.

The Integrity Monitor 2012 consisted of three parts:

1. A checklist of formal policies (written survey, distributed by mail to enhance response rate).
  - a. to the Secretary (the highest civil servant, and Director of the organisation) for the policies directed at civil servants and the Executive Board
  - b. to the Clerk (which supports the Council) for the policies directed at the Council Members
2. Perceptions survey of integrity and integrity policies:
  - a. among civil servants (web-based survey among a public administration-wide panel)
  - b. among political office holders (written survey, distributed by mail to enhance response rate).
3. A short inventory of the number of disciplinary cases was added to the checklists concerning civil servants and (alleged) integrity incidents for political officials.

Figure 2: The Integrity Monitor 2012 Model



This way, for the first time, the public administration could gain a coherent view of the integrity policies in place, people's perception of these policies, the integrity culture, and the number of investigated incidents. The checklist maps the formally implemented policies as prescribed in the Civil Servants Act and the Basic Norms. These were expanded with elements of the Integrity Infrastructure of the National Integrity Office.<sup>8</sup> Also included were the perceptions of the Secretary and the Clerk concerning priority given to integrity and integrity policies by the Executive (e.g. Mayor and Alderman) and Council, respectively. It also included, for the first time, a perceptions survey among political office holders. The survey for civil servants was shortened and adapted to fit 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, proving to be a serious limitation to the monitor 2012. This means that only general conclusions can be made about the relations between developments in integrity policies, awareness of policies and organisation's culture.

### Type and number of respondents

The response to the surveys was satisfactory, varying between a high 83% by the provincial secretaries to a low 25% by the political public officials of the Water Authorities.

Table 1: Type and number of respondents

Respondents	Sector	Number of organisations / civil servants <sup>9</sup>	Number of surveys	Response	
Secretary	Central	11	18	17	*
	Municipalities	415	415	143	34%
	Provinces	12	12	10	83%
	Water Authorities	26	26	15	58%
	<b>Total</b>	<b>464</b>	<b>471</b>	<b>185</b>	<b>39%</b>
Civil Servants	Central	122.537	2.370	1.041	44%
	Municipalities	175.176	3.170	1.222	39%
	Provinces	13.217	945	399	42%
	Water Authorities	10.085	593	253	43%
	<b>Total</b>	<b>321.015</b>	<b>7.078</b>	<b>2.915</b>	<b>41%</b>

\* The surveys for the Secretary General were distributed internally among the divisions within the ministries (such as the Ministry of Finance and the Tax Authority). This increased the number of actual respondents. Due to anonymity measures, it was not possible to calculate the response rate.

## Results of the Integrity Monitor 2012

### Management perception of implementation of integrity policies

An overview of the results of the checklist survey shows that most elements of the various integrity policies for civil servants, as obliged by law and other formal agreements, have been implemented by the central government, provinces, municipalities and Water Authorities. Table 2 shows the totals for the whole public administration.

The results show some variations between the levels of government, with central government being a front-runner in terms of its implementation of policies, while the municipalities lag behind. This is not surprising as the majority of municipalities are relatively small organisations.

The table presents a mixed picture. Many elements are generally implemented, but those elements that would make implementation stronger, lag behind.

For example, almost every organisation has integrity policies (98%) and a Code of Conduct (97%). The oath of office is taken almost everywhere (95%), integrity is part of personnel policy (98%), and there are procedures for reporting misconduct (97%) and side jobs (98%).

At the same time, whistle blower regulations and procedures providing access to an independent body (63%), procedures for disciplinary investigations (60%), the disclosure of side jobs (59%), regulations for reporting financial interests (49%), and activities directed towards the identification of vulnerable positions (43%) are not very developed. Moreover, integrity training, which would raise awareness, is lagging (54%).

In addition, it appears that the integrity policies in place have not been kept up-to-date. In the past three years, more than half the organisations asked have not updated their integrity policy plan (56%), nor their codes of conduct (66%). Moreover, monitoring and the evaluation of policies do not take place on a regular basis (54%). Although there

Table 2: Implementation of formal integrity policies according to Secretaries

Type	Laws and Standards specified according to survey questions	2012
Secretary	<b>General integrity policies</b>	
	Integrity policies laid out in writing	98%
	Code of Conduct	97%
	Oath of office (or solemn affirmation)	95%
	Monitoring/evaluation of integrity policies in 2010/2011	54%
Civil Servants	<b>Integrity part of personnel policy</b>	
	Integrity involved in parts of the personnel policy	98%-100%
	Integrity part of appraisal/assessment interviews	91%
	Integrity part of management or work meetings	82%
Law & Standards	<b>Procedure for reporting of misconduct</b>	
	Procedure for reporting of misconduct	97%
	Confidential integrity counsellor	92%
	Access to independent body	63%
Law & Standards	<b>Conflict of interest regulations</b>	
	Regulation for reporting side jobs	98%
	Overview of side jobs	70%
	Mandatory disclosure of side jobs for selected officials	59%
	Regulation for reporting financial interests	49%
Standards	<b>Vulnerable positions and processes</b>	
	Segregation of tasks or duties	83%
	Risk assessment of vulnerable positions and processes	43%
	Overview of vulnerable positions	28%

are no formal requirements to update policies or code, it is necessary to do so, particularly in view of recent developments such as the increased use of social media and the impact of the financial-economic crisis.

For a more accurate interpretation of the results above, it needs to be taken into consideration that these figures have been established on the basis of 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 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.

### Civil servants' perceptions of integrity policies and organisational culture

While we did see some variations between the levels of public administration in the implementation of policies, these differences are not reflected in the perception surveys among civil servants, which show a high level of unanimity between the levels of government.

Table 3 also produces a mixed picture. Three-quarters of the respondents (74%) indicated that they were aware of the existence of various procedures concerning integrity (e.g. regarding side jobs, gifts and expense claims). Civil servants are, to a much lesser extent (47%), familiar with general integrity policies, and only one in three (36%) indicated awareness of the procedures with respect to dealing with suspicions of misconduct. This seems to coincide with the levels of implementation that we saw above.

In terms of soft controls, most positive are the results from civil servants concerning cooperation between colleagues in the workplace. These show that almost four in five of those surveyed (78%) are satisfied. Soft controls that are indirectly linked to management are perceived as less favourable.

Two-thirds are positive about the quality, relevancy and guidance of organisational values and norms. Less are satisfied about the fairness of treatment by (personnel) management (57%, the most positive item concerning respectful treatment by a direct supervisor is approximately 75%), and only around a third are content with the role of management in relation to integrity and ethics. In general, the results on soft controls show great consistency within the constructs with little variance between items.

At the same time, the secretary survey points out that 92% of top managers are positive about the role model qualities of management. The dissimilarity in the perception of management versus personnel concerning ethical leadership is known as the 'it's lovely at the top' phenomenon (Treviño, Weaver, Brown 2008). This implies that top officials and managers often have a rosier picture of the structure and functioning of the integrity policies, and their own exemplary role, than the rest of the organisation. Managers tend to overrate their own performance and the policies for which they are responsible while underestimating the risks.

In the end, integrity policies are aimed at producing outcomes. Nearly nine in ten of those surveyed (88%) think their colleagues have an honest attitude towards work (the questions were phrased negatively, such as being dishonest about results, being non-productive during work, and calling in sick). In terms of ethical awareness, this goes down to two thirds. The survey questions whether colleagues can oversee the consequences of their actions and if they seek advice in moral dilemmas.

Two in five civil servants (39%) reported that, in their perception, certain integrity rules (six items, e.g. concerning the acceptance of gifts or invitations, and dealing with confidential information) were not complied with. However, this happens 'seldom', whereas only approximately 2% of respondents think rules are broken 'frequently'. There are no remarkable differences between survey items for the outcomes: a consistent picture.

Table 3: 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 norms	65%
	Cooperation with colleagues	78%
	Fair treatment	57%
Outcomes	Honest attitude towards work	88%
	Moral consciousness	66%
	Non-compliance with rules (negative statements)	39%

The results of the 2012 survey among civil servants were compared with the surveys conducted in 2006. Remarkably, these showed no differences in results. This could be explained in various ways. Firstly, integrity policies started in 1992 and the most progress in changing culture may have been made in the first years. However, this remains unknown, as there is no survey data available. Secondly, it could indicate a stable culture of the Dutch public administration. Thirdly, the differences between organisations and units are most likely larger than the average differences between levels of government. Some data is available on the organisational level, but access is limited due to anonymity measures. It could also be that the survey questions are no longer relevant. All these considerations are taken into account in the development of a revised Monitor for 2016.

### Registration of disciplinary investigations

The Monitor focused on outcomes of policies, on easily identifiable types of misconduct, or unethical behaviour of colleagues. These do not coincide with the types of misconduct as defined in the registration form for disciplinary cases.

In the survey for top management, questions concern how many disciplinary investigations were registered in 2011, and what kinds of (disciplinary) sanctions have been administered. The figures in the table below show the breaches and sanctions that occurred in the civil service, presented per sector.

As this is one of the first attempts in the Netherlands to collect such data (e.g. Heuvel et al. 2010), it is fair to view this critically. As not all organisations have submitted data, the table is not complete and cannot be compared with the total number of civil servants. In addition, almost a fifth (17-21%) of the surveyed top managers were unable to indicate how many investigations were conducted and what sanctions had been applied. In those cases registration was lacking, incomplete, or otherwise unclear.

The data shows more about the municipalities, as the survey results show only 79 cases, while the two major cities Amsterdam and Rotterdam are known for publishing their yearly reports on the disciplinary investigations, and each of them has over a hundred cases a year. The numbers for central government are more accurate as, according to the yearly report on central government in 2011, there had been 537 disciplinary investigations registered, 128 (of which 37 conditional) dismissals, and 171 other disciplinary measures.

That there can be great differences between individual organisations is also clear. 279 of the investigations in Table 4 were reported by just one Ministry. The Ministries are known for a wide variety in their chosen risk profiles and number of civil servants, e.g. the Ministry of Justice includes the entire prison system, and the Ministry of Finance includes the tax authority, which are both known for having strict integrity policies reflecting the vulnerable position of their civil servants.

Table 4: 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
<b>Total</b>	<b>532</b>	<b>66</b>	<b>197</b>	<b>29</b>



## Follow-up and lessons learned

The results were published as a report as well as on the website of the National Integrity Office.<sup>10</sup> All background information and data (tables) were also made available. The report was sent to Parliament and was formally presented to the press and discussed during a high-level meeting attended by the Minister of the Interior and Kingdom Relations, the presidents of the associations of the municipalities, provinces and the Water Authorities. The representatives reflected on the results, made formal statements and signed a joint letter of intent.<sup>11</sup>

In this letter of intent, the monitor was declared to be a useful instrument to periodically measure the improvements made to foster integrity. Based on the results, they stated that organisations still have to formalise and institutionalise the integrity function in these same organisations. Besides the aspects that are already well implemented (like the code of conduct and the oath), the themes that still have to be improved (like better accountability about integrity policies, transparency of side jobs, the better registration of integrity breaches and vulnerable processes) were explicitly mentioned. They concluded that they agreed upon the importance of integrity for the public sector. They recognised that integrity is indeed the cornerstone of 'Good Governance', as was stated in the Netherlands Code for Good Public Governance (2009). Based on this response, we can conclude that the report was well received and accepted. Further, BIOS published a statement about the monitor results and an article was published in a well-known public sector journal (Zwaap 2012).

Although we don't have a clear overview of the activities that have taken place in the different sectors as a direct response to the monitor results, we have witnessed some activities that seem to be related. Both the Water Authorities and the municipalities started a project to develop integrity toolkits, and the ministries set up a project to improve their integrity management approach as well. A next monitor, planned for 2016, will reveal to what extent these initiatives prove to be fruitful.

The Monitor and follow-up showed many valuable lessons that will be applied to the Monitor 2016. Real integration of the results was insufficiently possible, partly due to constraints related to adhering to anonymity for respondents, and partly due to a lack of similar questions between the various surveys: checklist, perceptions of policies, perceptions of misconduct, and information on disciplinary registrations. The consistency within the results of the perceptions survey could show the quality of the survey, but, as such, it doesn't seem worth repeating it unchanged in 2016. With advice from various experts in

discussion sessions, a proposal will be made for a new perception survey.

The 'I-monitor' 2012 was an initiative of the Ministry of the Interior in close cooperation with (umbrella) associations for the Municipalities (VNG), Water Authorities (UvW) and the Provinces (IPO). This co-production seems to work well. It ensures higher response rates, support for the results and the actions to be taken to address weak areas and, at the same time, stresses their own responsibility in this endeavour.

Another valued aspect of the Monitor is that it provides more than just an analysis. Part of the report is a separate chapter by the Netherlands Integrity Office that provides clear guidance with specific measures that can be taken to improve integrity and integrity policies within the organisation. This guidance document makes clear why specific measures are considered to be important, what risks occur when they are neglected or not well implemented, and which specific integrity instruments can be used to counter these risks.

By disclosing the results, we try to raise awareness within the public sector and also give insight into the state of government integrity to the public. In the past there have been several evaluations focused on the measures organisations had in place (code of conduct, gift rules, etc.). Having instruments in place does not mean that integrity was a standard in the organisation's culture. This is why this Monitor also focused on employee's perceptions on the integrity of their organisation. With the new Monitor, we tried to combine both approaches of monitoring integrity for the first time. By combining the inventory of implemented measures with a perception-based research approach, one is able to see if certain measures are not only available on paper but also carried out in the day-to-day activities of all civil servants and other officials. This gives a more realistic image of the integrity of the government.

## Practical Information

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### References

- Algemene Rekenkamer (2005), *Zorg voor integriteit. Een nulmeting naar integriteitszorg in 2004*.
- Dales, C.I. (1994), 'Om de integriteit van het openbaar bestuur', in: Huberts, L.W.J.C. (red.), *Machtsbederf ter discussie. Bijdragen aan het debat over bestuurlijke integriteit*, VU Uitgeverij: Amsterdam, p. 7-18.
- Dohmen, J. (1996), *De Vriendenrepubliek. Limburgse kringen*, SUN: Nijmegen.
- Dohmen, J. en J. Verlaan (2003), *Kreukbaar Nederland. Van bouwput tot beerput*, Prometheus/NRC Handelsblad.
- European Commission (2014). *EU Anti-corruption report*. Report from the Commission to the Council and the European Parliament, Brussels, 3 February 2014, COM(2014) 38 final.
- GRECO (2005), *Second Evaluation Round: Evaluation Report on the Netherlands*.
- Heuvel, van den J.H.J., L.W.J.C. Huberts, Z. van der Wal en K. Steenbergen (2010), *Integriteit van het lokaal bestuur*, Boom Lemma uitgevers: Den Haag
- Hoekstra, A., Makina, O. & Talsma, J. (2013). *Integriteit verankeren. Kwaliteit van het integriteitsbeleid in de publieke sector*. Den Haag: BIOS
- Hoekstra, A. and M. Kaptein (2014), Understanding Integrity Policy Formation Processes: A Case Study in The Netherlands of the Conditions for Change. *Public Integrity*, Vol. 16, No.3. Pp. 243-263.
- Huberts, L.W.J.C. and J.M. Nelen (2005), *Corruptie in het Nederlandse Openbaar Bestuur*. Utrecht: Lemma.
- Ministerie van Binnenlandse Zaken en Koninkrijksrelaties (2004), *Inventarisatie integriteitsbeleid openbaar bestuur en politie 2004*. (Ministry of the Interior and Kingdom Relations, Inventory integrity policies public administration and police 2004)

- Ministry of the Interior and Kingdom Relations (2009), *Netherlands Code for Good Public Governance*.
- Ministerie van Binnenlandse Zaken en Koninkrijksrelaties (2014), *Beleidsdoorlichting integriteit(sbeleid)*. <https://www.rijksoverheid.nl/documenten/kamerstukken/2014/05/15/aanbiedingsbrief-bij-rapport-beleidsdoorlichting-integriteit>
- Treviño, L.K. and G.R. Weaver (2003), *Managing Ethics in Business Organizations: Social Scientific Perspectives*, Stanford University Press.
- Treviño, L.K., G.R. Weaver and M.E. Brown (2008), "It's Lovely at the Top: Hierarchical Levels, Identities, and Perceptions of Organizational Ethics", *Business Ethics Quarterly*, Volume 18, Issue 2, April 2008, Pages 233-252, DOI: 10.5840/beq200818217
- Zwaap, Rene (2012), I-monitor biedt zicht op naleving basismorren, *PM Publiek Denken*, 01.06.2012, Editie: PM05, p19-22.

### Notes

- <sup>1</sup> The NCA has no powers over the decentralised public administrations as these have their own local Courts of Audits. The NCA conducted its first audit of the integrity policies of central government in 1996. Other audits followed in 1999, 2005 and 2010.
- <sup>2</sup> These are agencies such as legal entities with statutory duties (RWT) or independent administrative body (ZBO). These are autonomous, but the Ministries do have some political accountability for them.
- <sup>3</sup> See: Hoekstra, A. and M. Kaptein (2014); and Ministerie van Binnenlandse Zaken en Koninkrijksrelaties (2014).
- <sup>4</sup> Tweede Kamer (1993), Integriteit openbare sector, TK 1993-1994, 23400 VII, nr. 11 (Parliament, Integrity public sector)
- <sup>5</sup> These questions were repeated in the POMO-survey of 2008, but replaced in 2010 and 2012 with the questions on ethical behaviour of the Internetspiegel.
- <sup>6</sup> In the offer letter to Parliament for the report 'Integrity of Government' (2007) which includes the results of both surveys, the then Minister of BZK Remkes called the results 'worrying'.
- <sup>7</sup> 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.
- <sup>8</sup> <http://www.integriteitoverheid.nl/international/models-and-instruments/integrity-infrastructure-model.html>.
- <sup>9</sup> Source: [www.arbeidenoverheid.nl](http://www.arbeidenoverheid.nl), information on 2010.
- <sup>10</sup> <http://www.integriteitoverheid.nl/i-monitor.html>
- <sup>11</sup> [http://www.integriteitoverheid.nl/fileadmin/BIOS/data/Publicaties/I-monitor/Bestuurlijk\\_Statement\\_Monitor\\_Integriteit\\_Getekend.pdf](http://www.integriteitoverheid.nl/fileadmin/BIOS/data/Publicaties/I-monitor/Bestuurlijk_Statement_Monitor_Integriteit_Getekend.pdf)