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To cite this article: Alain Hoekstra, Leo Huberts & André van Montfort (2022): Content and Design of Integrity Systems: Evaluating Integrity Systems in Local Government, Public Integrity, DOI: [10.1080/10999922.2021.2014204](https://doi.org/10.1080/10999922.2021.2014204)

To link to this article: <https://doi.org/10.1080/10999922.2021.2014204>



Published online: 20 Jan 2022.



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Content and Design of Integrity Systems: Evaluating Integrity Systems in Local Government

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ABSTRACT

Public integrity is crucial, especially for local government organizations. Although research points out that a systematic integrity approach is to be preferred, only limited knowledge is available about what such an approach should entail. This article presents a framework that contains seven theory-based elements constituting a complete integrity system. This framework is used to assess the integrity systems in three large European cities, to detect shortcomings of these systems, and to provide recommendations for both administrative practise and future research. Based on the research findings the studied cities are, for instance, recommended: to improve their long-term awareness and support for organizational integrity; to work with a clearer definition of (and vision on) integrity (management); and to reflect more critical on their integrity system based on thorough policy analyzes and evaluations.

KEYWORDS

Integrity, integrity systems, integrity management, local government

Introduction

Nowadays, the importance of public integrity is widely recognized. The various definitions given in both literature and practice of the concept of 'public integrity' have as a common feature that the emphasis is placed on the moral quality of the actions of public institutions and their officials (Huberts et al., 2014). Public integrity refers to how public policies are decided on and implemented, whether the due processes and procedures are followed, and thus to how the results are achieved (Huberts, 2018). It is a crucial aspect of "good governance" (Huberts et al., 2014) and contributes to: the enhancement of public trust (Lewis & Gilman, 2012); the reinforcement of the constitutional state (Cowell et al., 2011); the improvement of economic growth, social stability and service delivery (Bossaert & Demmke, 2005); and the effectiveness of government activities (Maesschalck & Bertók, 2009). Public integrity presumably even contributes to the happiness of citizens (Veenhoven, 2018). Moreover, as civil servants -certainly at the local level- operate in a "fishbowl," integrity violations (like fraud, corruption, theft and other forms of misconduct) are likely to be discovered and exposed by the media, often leading to public outrage, law suits, and diminishing trust in the public sector (Hoekstra & Heres, 2016).

For cities and municipalities, it is all the more crucial to pay attention to integrity since local government organizations are accountable for large public expenditure in service provision areas that are often known for their vulnerability to integrity violations (Six & Huberts, 2008). Furthermore, local integrity risks are increased by the trend to decentralize public powers and responsibilities from the national to the local level, and by the intense contact with citizens at the local level, where officials may have greater vested interests based on social ties that can influence

public decision making (Transparency International Nederland, 2021). Local government organizations are therefore forced to think about how to address these vulnerabilities and risks and to prevent integrity violations (Huberts & Van Montfort, 2020, 2021).

Since integrity violations are mostly explained by multiple and mutual reinforcing causes (Hoekstra & Heres, 2016; Kaptein, 1998; Kish-Gephart et al., 2010) scholars acknowledge that safeguarding integrity requires a diverse set of integrity measures and activities (Huberts et al., 2014). The literature also points out that these measures and activities should not be implemented in a stand-alone manner, but that enhancing integrity is served by a much more integrated and systematic approach (Hoekstra & Kaptein, 2020; Huberts & Van Montfort, 2020; Maesschalck & Bertók, 2009; Six & Lawton, 2010; Van Montfort et al., 2018).

However, there is only limited knowledge of what a coherent and systematic integrity approach to government organizations should entail (Huberts & Van Montfort, 2020, 2021). To gain a better understanding on this matter a research project on municipal integrity systems was conducted recently (Hoekstra et al., 2021). The project was centred on integrity systems designed for civil servants. Measures and provisions aimed to support the integrity of appointed or elected public office holders, such as aldermen and city councilors, are not taken into account. Compared to civil servants' integrity, political integrity is quite a different theme, characterized by other types of integrity violations, and involving other responsibilities, instruments and sanctions (Van der Wal, 2018).

To gain a better understanding of the theoretical and empirical content and design of (local) integrity systems this article presents the most important findings regarding three questions: (1) what are the constituting elements of an assessment framework for local integrity systems according to the literature, (2) what shortcomings in local integrity systems can be identified by applying this assessment framework systematically, and (3) what practical recommendations can be made based on this systematic assessment?








Theory: Constituting elements of an integrity system assessment framework

Most studies on organizational integrity focus on individual measures and activities that can be used to promote integrity (Hoekstra & Kaptein, 2020; Huberts & Van Montfort, 2020). Among the many examples belong contributions on ethical leadership (Dobel, 2018; Heres et al., 2014; Lasthuizen, 2008), ethics and dilemma training (Svara, 2007; Van Montfort et al., 2013; Warren et al., 2014), codes of conduct (Kaptein & Schwartz, 2008), whistleblowing (De Graaf, 2010), and confidential advisors (De Graaf, 2019; Hoekstra & Talsma, 2021).

At the same time there is growing awareness that a more inclusive and integrated "integrity system" approach, in which all of the integrity measures and activities are combined and (inter)-connected, is to be preferred (Hoekstra & Kaptein, 2020; Huberts & Van Montfort, 2020 and 2021; Maesschalck & Bertók, 2009; Six & Lawton, 2010; Van Montfort et al., 2018). Scientific literature indicates that the effectiveness of integrity measures and activities depends on the working and credibility of the overall system (De Graaf & Macaulay, 2014; Macaulay et al., 2014; Six et al., 2012; Slingerland et al., 2012; Van den Heuvel et al., 2017).

A complete integrity system comprises a number of specific elements. Research on anti-corruption strategies and institutions (De Sousa & Quah, 2010), national integrity systems (Pope, 2000; Slingerland et al., 2012), local integrity systems (Huberts et al., 2008), ethics and integrity management (Anechiarico, 2017; Graycar & Smith, 2011; Jurkiewicz, 2020; Kaptein, 1999; Maesschalck & Bertók, 2009; Menzel, 2016; Paine, 1994; Svara, 2007), and on specific integrity measures has resulted in a set of key elements (Table 1). This set has been applied, evaluated, and adapted over time (Van den Heuvel et al., 2017) and has been used for assessing the quality, i.e., the completeness, of the local integrity systems for civil servants in the three cities involved in this current research. The assessment framework is theory-based and is within the context of

Table 1. Assessment framework for local integrity systems for civil servants

1.	Attention 	<i>Integrity on the agenda:</i> integrity gets permanent attention, is regularly discussed within all layers and sections of the organization, and the integrity system is provided with sufficient resources.
2.	Clarity 	<i>Integrity defined:</i> the concept of integrity and the vision on integrity policies and strategies are clearly defined, formulated, and operationalized in a coherent way.
3.	Leadership 	<i>Integrity managed:</i> managers set the good example, show exemplary (ethical) behavior, are open to employees' integrity concerns, and support and enforce the organization's integrity policies.
4.	Balance 	<i>Integrity in balance:</i> attention is paid to a well-balanced and coherent integrity strategy that is both value-oriented (training, internalization, and moral awareness) as well as rule-oriented (rules, supervision, and sanctions).
5.	Policies 	<i>Integrity policies and measures:</i> the organization has specific integrity policies and measures in place, such as: code(s) of conduct, integrity regulations (for instance on gifts, side jobs, procurement, etc.), personnel integrity policies and training programs, internal procedures for reporting integrity violations, investigation procedures, central registration formats for administering integrity violations, and integrity risk analyses tools.
6.	Organization 	<i>Integrity institutionalized:</i> the organization establishes an integrity office/commission, or appoints (central/decentral) integrity officers to coordinate the efforts of the various internal integrity actors from a systemic point of view.
7.	Reflection 	<i>Integrity monitored:</i> critical reflection takes place on a regular base, including periodical monitoring and evaluation of integrity policies and measures in terms of implementation, effectiveness, and required adjustments and improvements.

this current article not up for debate, but provides the answer to the first research question: what are the constituting elements of an assessment framework for local integrity systems according to the literature.

Methodology: Case-studies in Munich, Antwerp, and Amsterdam

This article is grounded on a research project issued by the Dutch House of Representatives (Hoekstra et al., 2021). The research project followed a qualitative, socially constructive approach (Creswell, 2013, p. 24) based on case-studies conducted in Munich, Antwerp and Amsterdam.

The selection of these three cities was inspired by a previous international comparative study on the integrity systems of seven large cities (Huberts et al., 2008) and by information obtained from the German and Flemish experts we consulted. A most-similar case study design has been strived for by selecting cities which are similar in relevant respects and therefore form a fairly homogeneous research group. All three examined cities are large in size, have an international character, and have the reputation to belong to the national “frontrunners” if it comes to integrity management.

The research results are however not only relevant for this category of cities. The shortcomings found with regard to the quality or completeness of local integrity systems will probably be present to a greater extent in small municipalities that do not have an international character due to

their less extensive resources, and in municipalities that are not known frontrunners in the field of promoting integrity (see also: Transparency International Nederland, 2021; Schöberlein, 2019).

The “within-case” analysis of each of these city administrations was followed by a “cross-case” analysis (Creswell, 2013, p. 101). Both types of case analysis used the framework outlined above in Table 1.

Several research methods and sources were combined in the three case-studies. The analysis of the cities’ institutional contexts was mainly based on policy documents and research literature. A combination of both desk-research and interviews was used to assess the local integrity systems with the help of the framework. In every city a contact person was appointed who provided the researchers with the available policy documents and who helped them to make a selection of the most relevant interview candidates.

In total 18 interviews were conducted in the period September–November 2020. Because of Covid-19 travel restrictions all interviews had to be conducted by phone or by video conferences. In addition to respondents that were involved in local integrity system internally, policy experts on the national level and representatives from municipal associations were interviewed as well. The interview results were processed anonymously in order to increase the respondents’ feelings of confidence and safety. The on the interviews based concept versions of the cities’ integrity assessments were verified by the contact persons on factual inaccuracies and omissions.

Research findings

In this section the main research findings are presented. Prior to the results of the evaluation of the three local integrity systems some relevant differences in the institutional contexts of the three studied cities are described first. This creates a better understanding of the cities’ situations and challenges in the field of integrity management.

Institutional contexts in Germany, Belgium, and The Netherlands

The federal and regional authorities in Germany and Belgium hardly play a role with regard to local integrity policies. As central control is limited, German and Flemish municipalities are predominantly free to implement integrity policies as they see fit. In the Netherlands, however, the national Civil Servants Act contains a detailed set of integrity measures for Dutch government organizations (including municipalities). The Dutch Ministry of the Interior and Kingdom Relations is responsible for the content and design of these measures, for encouraging and supporting government organizations to implement these measures, for monitoring the implementation of these measures, and for intervening in government organizations in case of long-term, structural, integrity problems (Hagedoorn & Hermus, 2016; Hoekstra & Kaptein, 2014; Lamboo & Hoekstra, 2016). As such it appears that Dutch local government organizations experience stronger national guidance and control than government bodies in neighboring countries.

What stands out secondly, is the difference in the terminology used in the three countries. In the German administrative context, the term “integrity” is hardly used. Instead, the terms “anti-corruption” and “compliance” are common. Both terms are expressions of the rule-oriented approach, which is dominant within German government (Von Maravic & Schröter, 2008). In the Flemish administration, the term “integrity” has become more established over time, while in the Netherlands “integrity” is a common and widely accepted term since the early 1990s and often defined there as acting in accordance with the relevant moral values, norms, and rules (Huberts et al., 2014).

Thirdly, the presence of existing research material on local integrity appears to vary considerably among the three countries. German research publications on local integrity policies were virtually absent until recently. The limited number of studies indicate that German local integrity

policies are neither theoretically nor empirically founded and often incoherent (Meyer & Frevel, 2017). Moreover, the implementation of integrity policies is weak (Stark, 2019; Trunk & Hiller, 2017) and smaller municipalities in particular are barely active in this field (Meyer, 2017). In Flanders, there is a similar lack of research interest. Existing research in this field predominantly focusses on the city of Antwerp (Lambrechts, 2012; Loyens & Maesschalck, 2008; Vandeplas & Breëns, 2008). Although the Flemish local integrity policies are currently still at an early stage, attention has increased in recent years. The obligation in the municipal decree to draw up a deontological code, but also recommendations from Audit Flanders based on general audits and forensic investigations certainly triggered this attention. The formalization of integrity policies remains, however, limited in most municipalities (Demaerschack, 2020). Compared to Germany and Flanders, Dutch research into local integrity has a much richer tradition. In addition to studies that focused on the integrity system of the city of Amsterdam (Huberts et al., 2008; Huberts & Six, 2012), the integrity systems of many other Dutch cities and municipalities have been investigated as well (Heres et al., 2014; Hoekstra & Kaptein, 2014; Van den Heuvel et al., 2017; Van Montfort et al., 2018). The integrity monitor, conducted every four years by the Dutch Ministry of the Interior and Kingdom Relations, is another important source of information for the state of affairs on the implementation and perception of (local) governmental integrity policies (Lamboo & Hoekstra, 2016).

Applying the integrity system assessment framework; identifying shortcomings in local integrity systems in Munich, Antwerp, and Amsterdam

In this section, the prevalence of the seven system elements within the city administrations of Munich, Antwerp, and Amsterdam is described per element. This gives a rather comprehensive picture of the quality, i.e., completeness, of the local integrity systems and the main similarities and differences. Especially the considerable differences in the cities' organizational integrity arrangements (element six) are noticeable. This section answers the second research question: what shortcomings in local integrity systems can be identified by applying this assessment framework systematically?

Element 1: Attention

It is striking that integrity was primarily put on the political and administrative agenda in each of the three cities following significant integrity violations. Violations generate attention and are almost always the reason to initiate or intensify local integrity policies. That attention, however, often gradually subsides until another incident occurs. As such the attention to integrity can be qualified as incident-driven. Especially political public office holders, like city counsellors and aldermen, are prone to react on integrity violations instead of showing a more proactive interest in this topic. Political support is mainly expressed in terms of the resources that are made available for the integrity system, with little interest for the content and design, the effectiveness, and the necessary improvements of these systems.

Element 2: Clarity

In all three cities, the integrity concept is not clearly defined. In the Munich city administration, the word integrity is not even used. Although separate integrity related policies and measures (like anti-corruption, bullying, harassment, intimidation, and discrimination) are in place, they are not labelled and organized as a coherent set of integrity measures, let alone as an integrity system. Despite the specific integrity policies and systems the cities of Antwerp and Amsterdam

have in place, these administrations still lack a clear integrity vision and plan defining the goals, strategies, measures, and the responsibilities of the involved integrity actors.

Element 3: Leadership

Respondents in the three cities indicated that integrity is not a standard concern for every manager and that there is room to improve ethical leadership. Managers sometimes find it difficult to discuss integrity in a positive and appropriate way. It is important that managers are supported in this, as this increases the confidence of employees to discuss integrity issues with their supervisors. In each of the three cities, specific programs and courses are available to educate managers in this regard, but these are only compulsory in Munich. Despite the room for improvement the interviews also indicate that integrity issues (certainly the serious ones) are dealt with by managers and that there is no permissive culture.

Element 4: Balance

Each of the cities has measures in place that are in line with a rule-oriented approach (e.g., rules, procedures, supervision, and enforcement) and a value-oriented approach (e.g., training, awareness raising, internalization, and moral judgment). In terms of balance between the two approaches, it is striking that the emphasis on these approaches changes over time. After serious incidents, stricter rules, controls, and sanctions are usually effectuated, while in more “quiet” times integrity training and awareness raising sessions gain popularity.

Element 5: Policies

All three cities have the more or less “usual” set of integrity policies and measures in place. These include, for example, rules and procedures relating to confidential information, declarations, the acceptance of gifts and invitations, ancillary positions (side jobs), public procurement, the division of specific tasks, and the rotation of certain jobs. A difference between Munich on the one hand, and Antwerp and Amsterdam on the other, is that the first does not have a central code of conduct. Instead, Munich’s guiding civil service values and standards are described in various documents.

The HR related integrity measures like adequate selection processes, swearing-in ceremonies, introductory courses for new employees, staff interviews, and personnel assessments are also paid attention to in the studied administrations. Although in Munich a specific integrity training programs does not exist, employees are certainly made aware of integrity-related themes. Furthermore, it appears that in Munich such training and awareness activities are more focused on managers than on individual employees. In Antwerp and Amsterdam, integrity training programs are offered to employees. Next to explaining the integrity policies, rules, and codes in these training sessions the civil servants are also trained in solving ethical dilemmas.

In each of the three cities, internal contact persons are available to advise employees on integrity (related) issues or to report (suspicions) of integrity (related) violations. Within the Munich administration, employees can turn to the “Personalrat” (the German equivalent of the Works Council) which has a much broader, and therefore less specialized, scope than the confidential integrity counselors appointed in Antwerp and Amsterdam who are specialized in dealing with unwanted behavior on the work floor and with other integrity violations.

Although the internal communication about (suspicions of) integrity violations could be used to affirm the organization’s integrity standards and to signal out that management firmly responds to such violations, the three administrations are reluctant to do so. Respondents declare that privacy concerns hold organizations back from communicating internally about integrity

issues in individual cases. Unlike in Munich and Antwerp, in Amsterdam notifications of suspicions of integrity violations and the results of the investigations following these notifications are centrally recorded by the Integrity Office and published anonymously in annual reports of this office.

Although risk analyses are performed in each of the three cities, there are differences as to how this is done. In Munich, risk analyses are carried out in some units to identify activities that are sensitive to corruption. In Antwerp, integrity risks are analyzed as part of general organizational audits that also cover a range of other (non-integrity related) topics. Only the (Integrity Office of the) city of Amsterdam performs risk analyses specifically focused on integrity risks and vulnerabilities.

Element 6: Organization

The three cities differ considerably in terms of their organizational arrangements for promoting integrity. Strictly speaking, the Munich administration lacks an integrity system. An integrity system as a coherent collection of measures, activities, and functions to promote and maintain organizational integrity is simply non-existent in Munich (just as in other German administrations). However, various departments and officials pay attention to certain integrity related topics. To detect, address, and prevent corruption Munich, for instance, established a central anti-corruption unit and appointed decentral anti-corruption officers. Furthermore, the internal Audit department can monitor and investigate internal procedures with regard to, for instance, data protection, ancillary activities, public procurement, and contracts. The HR department is another key-actor and is focused, among other things, on the rule compliant behavior of civil servants and provides advice on the disciplinary consequences of wrongdoings. Moreover, a variety of contact and reporting points are established for (integrity related) themes like equal treatment, intimidation, harassment, bullying, discrimination, and psychological wellbeing. As all the described actors are responsible for specific themes and because an overall and coherent integrity approach is lacking, Munich's integrity system should be qualified as fragmented.

Antwerp has an independent, mainly advisory, integrity commission composed of internal and external (parttime) members. This commission convenes once a month and provides advice on, for instance, the contents of the code of ethics, the handling of integrity violations, and the enhancement of integrity awareness within the organization. Next to the commission several other actors are involved in the Antwerp integrity system, among whom three key-players can be distinguished. The city director is the ultimate responsible actor for the integrity system and plays an important role to create attention for integrity within the organization. The HR department provides integrity training programs, appoints integrity councilors, and enforces penalties for integrity violations. The (internal) Audit department can investigate possible integrity violations. The commission coordinates the various integrity actions and actors, but only to a certain extent and in an informal way. All in all, Antwerp has chosen for a rather informal and low-key integrity approach that rejects bureaucracy, formalization, and strictness.

The Amsterdam Integrity Office plays a central and coordinating role within the city's integrity system. The office employs 23, full-time, integrity specialists in 2021. The tasks of the office include: serving as a reporting point for (suspected) integrity violations, conducting investigations into (suspected) integrity violations, performing integrity risk analyses, providing training and advice, screening external business partners, and coordinating the work of 46 (decentral operating) confidential counselors who can be consulted by employees in the case of undesirable behavior (like harassment) of colleagues and on other integrity issues. The department directors are responsible for the implementation of the appropriate integrity measures within their organizational units and for entrusting the Integrity Office to conduct integrity investigations. Based on the outcomes of such investigations, the Legal Affairs department advises department directors

on the appropriate personal consequences (sanctions) for integrity violators. In conclusion, the Amsterdam integrity system can be characterized as the most formal and coherent one in the three cities.

Element 7: Critical reflection

Formalized integrity plans, but also the periodic monitoring, evaluation, and reflection on these plans are insufficient in each of the administrations studied. This also applies to the reflection on the organizational integrity measures and -system in use. The extent to which the integrity system and/or its components need to be adapted is at most implicitly assessed on the basis of signals from the organization. None of the administrations utilize thorough in-depth integrity policy analyses and evaluations. This finding is consistent with the results of other current research on this topic (Hoekstra & Zweegers, 2021; Transparency International Nederland, 2021).

Conclusion and discussion

The assessment results indicate that there are substantial opportunities for improvement. This in itself is not a surprising conclusion since the used assessment framework is based on an ideal system. In the present section, the third question of this article is answered by formulating a number of practical recommendations for both local and national governments. The findings are compared with other research in this field, followed by suggestions for further research.

Practical recommendations for Local Government Organizations

The overall effectiveness of an integrity system is determined by the existence, implementation, and interconnectedness of its constituting elements. Based on the present research, recommendations can be formulated for each of these elements. Local government organizations and their political representatives should improve their long-term awareness and support for organizational integrity (element 1). More clarity on the definition of integrity and a better conceived integrity management plan is also recommendable (element 2). Mandatory integrity programs for organizational managers, that are repeated on a regular basis, are suggested to further improve ethical leadership (element 3). Local government organizations are also urged to maintain a balanced integrity approach, consisting of both rules-based and values-based integrity measures and activities (element 4).

Regarding integrity policies (element 5), several recommendations can be made. Integrity codes, -rules, and -procedures can only be effective if they are properly communicated within the organization. The integration of integrity aspects within the recruitment and selection process, the introductory course (for new employees), and in personnel interviews and assessments is also required. Moreover, organizations should provide (regular) integrity training sessions that not only explain the integrity rules employees are bound by, but also teach them how to make moral decisions in ambiguous, dilemma-like, situations. In addition to internal reporting procedures (integrity hotlines), organizations should consider to appoint so-called confidential integrity counsellors to inform employees on how to report (possible) integrity violations adequately. Local governments are also encouraged to communicate integrity violations that have occurred to (re)affirm organizational integrity standards and to signal out that the leadership takes these violations seriously. It is recommended to register notifications of suspicions of integrity violations, and the results of the investigations following these notifications, in a central system. This provides valuable insights into the nature and extent of the integrity problems at issue and makes it possible to target integrity measures and policies to prevent these problems in the future. For the sake of transparency, it is also recommendable to publish this information publicly in, for

instance, annual reports. Detecting (and addressing) integrity risks provides valuable input for the organization's integrity system. Targeted measures can be taken on the basis of these analyzes. Risk analyzes are ideally carried out periodically in all organizational units.

Regarding the organizational integrity arrangements (element 6), it is preferable to implement a systemic integrity design that effectuates coherency between the various integrity elements and that promotes cooperation between the organizational actors which are responsible for those elements. As such, incomprehensible and fragmented integrity initiatives (as is the case in Munich) are less desirable: initiatives related to integrity improvement should be labelled as such, because this increases the visibility of the integrity system within the organization and emphasizes the importance of integrity.

Furthermore, a sufficiently formalized and directed integrity approach is to be preferred over an informal and loose approach (as is the case in Antwerp). The former approach contributes to the coherent implementation and continuity of the organizational integrity policies. One last recommendation regarding the organizational integrity arrangements is that a central integrity unit (as is the case in Amsterdam) ideally should be combined with decentral integrity officers in all departments of the local authority. Such an arrangement increases the embeddedness of the integrity system within the entire organization.

The critical reflection on the integrity system (element 7) needs to be improved in each of the three cities. To what extent the integrity system and the individual integrity measures actually work is not based on thorough policy analyzes and evaluations but on implicit, casus-driven signals received from the organization. A more proactive reflection based on monitoring, evaluation, and adaptation is important for the improvement the integrity system.

Practical recommendations for the National Level

The present research also provides recommendations for national governments to improve the quality of local integrity systems. Although these recommendations are initially and foremost related to the Dutch national government, it appears that other countries that want to improve their local integrity systems for civil servants could benefit from the recommendations listed below as well.

Firstly, the research findings show that the concept of integrity needs clarification. In the Netherlands, this concept is defined very broad and refers to both legal and moral qualities, such as playing by the rules and adhering to public values. The downside of such a broad and fluid definition of integrity is that it creates ambiguity (Kerkhoff & Overeem, 2021), which is demonstrated by various integrity investigations in which different investigative bodies came to different judgments on the same integrity issue. As such the national government should initiate a discussion on the content and scope of the concept of integrity.

Secondly, the national government should develop a more coherent national public integrity strategy (GRECO, 2019), should take more responsibility to give direction to local integrity policies, and should make more efforts to encourage the implementation of local integrity policies. In recent years, the Dutch national government seems to have paid less attention to public integrity issues and policies (GRECO, 2019), also with respect to municipal civil servants. Support, and maybe even some pressure, from the national government to keep the integrity focus at the local level alive is recommended.

Thirdly, most Dutch municipalities (especially the small and medium-sized ones) have to rely on expensive private consultancies to investigate integrity violations, as they lack the experience and professionalism to conduct such investigations adequately themselves. These private parties however use different investigative and normative standards (Zouridis & Van der Vorm, 2013), of which the quality is often unclear. As such a national institute like Audit Flanders may be of added value for improving the quality of local integrity policies and systems.

Related research

The recommendations are largely in line with the results of previous studies (Huberts et al., 2008; Van den Heuvel et al., 2017; Van Montfort et al., 2018). These studies on municipal integrity systems also concluded: that there is often uncertainty about the meaning of the term “integrity”; that employees are only to a limited extent aware of the existing integrity policies; that there is often insufficient clarity about which actor is responsible for what with regard to managing integrity; and that there is often a lack of an integrated (coherent) strategic vision and approach as the basis for integrity policies. This final point was also made in an explorative study of integrity systems in European local authorities by Transparency International Nederland (2021) and was one of the conclusions of the GRECO (2019) evaluation report of the Netherlands.

Suggestions for further research

The presented framework for assessing the quality of local integrity systems for civil servants is based on earlier versions that have been applied, evaluated and adapted over time. The application of the framework within an international context is however a novelty. The experiences in the current study are positive and indicate that the framework can be used in an international context. This does not come as a surprise as the framework is based on a wide variety of international scholarly sources in the field of ethics and integrity management. The framework should however be used in more countries to further test and verify its applicability.

In this regard also the institutional context within other countries requires further attention. What other aspects than the influence of the national government, insights in pre-existing and comparable research results, and terminological issues turn out to be relevant for the interpretation of the research findings? Another possibility is to integrate the institutional context in the framework by adding it as the (eight) element “institutional alignment”.

Another avenue for further research is related to organizational size. Each of the three studied cities have large administrations and are perceived as frontrunners within their countries. In terms of system completeness, they are not representative for other cities or municipalities, and certainly not for the smaller ones. As smaller organizations have less resources (e.g. budget, time, expertise), it is likely that their integrity systems are not as complete and well equipped. The question of how to manage integrity within smaller organizations seems to be an under-researched area that deserves much more attention.

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