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Integrity management systems

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Abstract

Recent years have seen various attempts at conceptualizing integrity management within organizations. This chapter focuses on those integrity management models that take a systems perspective. The latter refers to an approach that emphasizes interconnectedness and requisite variety, as well as the processual and iterative nature of integrity management and the importance of grassroots participation. The chapter discusses five examples of integrity management models that, at least to some extent, exhibit these four characteristics: Organizational Integrity System, Integrity Management Framework, Integrity Infrastructure, Pluralistic Ethics Management Framework, and the Ethics Program model. The chapter concludes that these models provide a useful basis for practice and research, but it also argues for more in-depth qualitative and quantitative research. Such research would be the basis for more context-sensitive and parsimonious models, which would also take the timing of the introduction of interventions into consideration and which would pay more attention to the unintended consequences of ethics management.

Keywords

Ethics management, integrity management, systems approach, requisite variety

1. Introduction

The idea that the integrity or ethics of employees can and should be managed is an old one. Yet since the last decade of the previous century, ethics or integrity management has really developed into a field of academic research as well as a separate area of management with its own organizational units, professionals and networks. Some of the drivers of this development in the public sector were the ethical challenges presented by New Public Management, evolving expectations of citizens and the declining trust in government. Similar issues of distrust played a role in the growth of ethics management in the private sector, particularly since a number of high-profile scandals such as Enron or WorldCom and the financial crisis of 2008.

This relatively new academic and professional field of ethics or integrity management draws from a broad range of disciplines and professional fields, including public administration ethics, business ethics, behavioural ethics, corruption prevention, compliance, etc. This chapter will not focus on these separate disciplinary perspectives, but takes a more generic 'systems' perspective. By 'systems perspective', we refer to an approach that emphasizes

interconnectedness and requisite variety, as well as the dynamic and iterative nature of ethics management and the importance of grassroots participation.

This chapter will first explain that perspective and then illustrate it with a few examples of ‘integrity management system’ (IMS) approaches. As will become clear, not all models that take a systems perspective explicitly have the ‘system’ label in their name. Partly depending on the discipline or field in which they were developed, they might be called framework (Maesschalck & Bertok, 2009), program (Kaptein, 2009; Weaver & Treviño, 1999), infrastructure (Tenbrunsel et al., 2003) or otherwise. Models also vary in the level upon which they focus. For example, many prescriptive models in the area of corruption prevention focus on the national or regional level (e.g. Pope, 2000), addressing the role of a broad range of actors including regulators, actors in the criminal justice system, NGOs, the media etc. With its focus on ethics *management*, this chapter will take a more narrow perspective and focus on the level of the organization. While those important actors at national or regional level might be relevant as contextual factors, they are not the focus of the integrity management system approach discussed in this chapter.

2. The ‘integrity management system’ approach

In this chapter, ‘ethics’ and ‘integrity’ will be used interchangeably. Both will be defined as “the quality of acting in accordance with relevant moral values, norms and rules” (Huberts, 2018, p. 22). Integrity management refers to the deliberate measures “to create an ethical culture and to impede unethical behavior and promote ethical behavior” (Kaptein, 2015, p. 416) within an organization. By using the term ‘deliberate measures’, this definition of integrity management is a bit broader than other definitions such as Kaptein’s (2015, p. 416), which focusses on “the formal organizational control system”. Our conceptualization not only includes formal measures of ethics management such as the introduction of an ethics code or the organization of formal ethics training, but also informal measures with an impact on (un)ethical behavior such as messages communicated through day to day leadership or informal sanctions (Tenbrunsel et al., 2003). This broader definition fits with the systems approach’s emphasis on the interconnection between various components (see below). Yet our definition is not as broad as e.g. Tenbrunsel et al.’s (2003) concept of ‘ethical infrastructure’, which also includes an organization’s ethical climate. We consider the latter as an outcome that the integrity management system is supposed to impact, not an element of the integrity management system itself.

With integrity *management* being a set of deliberate measures, an integrity management *system* (or IMS) comprises the whole of those measures as well as the actors implementing them. Drawing from Six and Lawton (2013, p. 640), we here define a *system* as “a complex object whose parts or components are held together by bonds of some kind” (Bunge, 2004, p. 188). An integrity management system *model* or IMS model is then a systematic representation of ethics management measures. The systems approach to ethics management has a number of characteristics that often return as recommendations in the ethics management literature, also in the discussion of models that do not use the ‘system’ label. We focus on four of these characteristics (See also Maesschalck, Forthcoming): interconnectedness, requisite variety, processual perspective, and grassroots participation. We now discuss each of them and summarize this discussion in Table 1 below.

Interconnectedness

The notion of interconnectedness (or interdependence) is at the core of Bunge (2004, p. 188)'s definition of a system. A systems approach moves beyond the study of individual ethics management components and looks at how they connect and how they jointly impact ethical culture and (un)ethical behaviour. This plays a role within ethics management, between ethics management and other interventions within the organization, and between ethics management and the organization's external environment. We discuss each of these three levels in turn.

First, more and more emphasis is put on the interdependence between individual integrity management measures. Like the spokes in a bicycle wheel, the effect of one depends on the effect of the other. Spokes that are missing weaken the wheel, make it run less smooth, which eventually may lead to a malfunctioning bike. Thus, when the resources for one part of the IMS system are reduced, then this will likely have spill-over effects across the whole system (OECD, 2020, p. 33). This also works for more substantive policy choices. For example, when an organization decides to weaken compliance rules for senior management while maintaining strict constraints on employees lower in the hierarchy, this is likely to undermine the legitimacy of its ethics management and might generate cynicism, frustration and thus perhaps unethical behaviour. Of course, this interdependence can also work in a positive way. Specifically, synergies can occur when the effect of one intervention strengthens the effect of other interventions, generating a joint effect that is stronger than the sum of the effect of the instruments if they would have been applied separately (Kaptein, 2015; MacLean & Behnam, 2010). Hoekstra and Kaptein (2020) describe this as the alignment of instruments. For example, while the distribution of the text of a new ethics code in itself might not make a big impression on employees, the effect might be significantly stronger if that distribution is combined with a training session, repeated references to the document by senior management, etc. Six and Lawton (2013) explicitly embraced this interconnectedness in their 'theory of integrity systems' by proposing a configurational approach that helps to develop a non-linear explanation of how various constellations of elements of an integrity system can generate various outcomes in terms of ethics. Many have addressed a crucial practical implication of these interdependencies: the need for coordination. Hoekstra (2016) and the OECD (2020, pp. 35–37), for example, map several ways in which various actors in an IMS can coordinate. Integrity officers will play an important role in this coordination. Yet such coordination can be made difficult by a tendency for actors such as integrity officers, but also other relevant actors within the IMS such as Human Resources, Internal Audit, Finance, or Communications, to remain within their 'silo' (Maesschalck, 2019, p. 162). Particularly when resources are constrained, less might be invested in horizontal cooperation (OECD, 2020, p. 33).

Second, the interconnectedness also plays with other interventions that might not be part of the IMS per se, but might still have an impact on ethics management. For example, when a sales training promotes aggressive selling techniques that are at odds with what is being taught in ethics training, this is likely to undermine the latter's effect. Conversely, when the message in both types of training is similar, then their joint positive impact might be stronger than the sum of the impact of the messages in each of the trainings separately. A related

phenomenon is that of a “decoupling” between integrity management on the one hand and the rest of the organization on the other (MacLean et al., 2015; MacLean & Behnam, 2010). When that occurs, ethics management comes down to not much more than ‘window dressing’. An ‘easily decoupled’ policy makes it look like the organization conforms, e.g. to externally imposed standards, while it in actual fact insulates a large part of the organization from those expectations (Treviño & Weaver, 2003, p. 127). Treviño and Weaver (2003, p. 128) give the example of a major financial services firm, where middle managers denied knowing about ethics policies that they had actually signed as a condition of employment. Research on the decoupling between formal compliance programs and the rest of the organization indeed suggests that such decoupling can be very counterproductive for ethics management (MacLean & Behnam, 2010).

Third, interconnectedness also plays with interventions and actors outside the organization. While we chose to focus on the organizational level to study IMS, that of course does not prevent us from looking at the interaction between the organization and its environment. This environment consists of various external actors, some of which can be considered an ‘integrity guardian’ or “an agency with oversight and control powers concerning integrity violations” (Six & Lawton, 2013, p. 641). These will have an important impact shaping the IMS itself, but they can also interfere with its functioning, both by strengthening or weakening its impact. Of course, the environment is much broader than these dedicated external integrity actors; there are many other stakeholders that can impact both the design and the effectiveness of an IMS. For example, the implementation of a new gift and gratuities policy for employees will be much easier when contractors or lobbyists are aware of the policy, of the reasons why it has been launched and of its consequences for them if they violate it (e.g., future exclusion from service purchases). That is why many IMS models often recommend involvement of external actors in both the design and the implementation of ethics management measures.

Requisite variety

An often returning mantra in the ethics management literature is the need for variation as well as comprehensiveness. Hoekstra and Kaptein (2020) argue for a pluralist approach. So do Martineau et al. (2017), who also explicitly refer to systems theory and particularly Ashby (1947)’s principle of requisite variety. Most models offer some kind of classification of ethics management instruments, arguing for sufficient variation across those different types of instruments. As such they argue for a sufficiently broad ‘scope’: the range of measures or instruments included in a system (Kaptein, 2015, p. 419). Integrity systems with a larger scope are then hypothesized to be more effective because they can fulfil more functions or because this renders the message that the organisation takes ethics seriously (Kaptein, 2015). Kaptein (2009, p. 264), for example, argues for a large number of instruments and Van Montfort et al. (2018) plea for comprehensiveness, implying that all elements of the integrity system should be present.

Even better known than these various classifications of ethics management instruments, are classifications into broader approaches to ethics management. The most classic distinction here is between the rules-oriented and values-oriented approaches to ethics management. Introduced by Paine (1994), this opposition was further developed and researched by Weaver and Treviño (Treviño & Weaver, 2003; Weaver, 2014; Weaver & Treviño, 1999) and others.

The rules-oriented approach aims at compliance through discipline and a contractual exchange between the organization and its employees (Weaver & Treviño, 1999). The values-oriented approach aims at shared values by strengthening employees' ethical role identity and communicating organizational support (Weaver & Treviño, 1999). Many authors have recommended that both should be combined (or 'balanced') in a judicious mix (e.g. Maesschalck, 2004; Weaver & Treviño, 1999). The distinction has also been criticized, with, for example, Maesschalck (2004) proposing a fourfold alternative to the dichotomy and Martineau et al. (2017) even a sixfold alternative.

Processual perspective

Researchers increasingly emphasize the dynamic and iterative (Hoekstra & Kaptein, 2020) nature of ethics management by taking a processual perspective (Constantinescu & Kaptein, 2020). Several authors (Hoekstra & Kaptein, 2020; Maesschalck & Bertok, 2009) use the 'Deming cycle', taken from the quality management tradition, to conceptualize this process. This cycle conceptualizes the development, implementation and evaluation of interventions in four steps: plan, do, check and adapt (hence the PDCA-cycle). It is indeed possible and useful to establish such a cycle for ethics management. It ensures that the IMS will learn from its implementation and adapt when interventions do not seem to work from the beginning or need adaptation because of changing circumstances. Such a perspective also helps to avoid the common problem of the "implementation deficit" of ethics management: lofty ambitions that are not being implemented or are quickly forgotten when other concerns (e.g. profit or a pandemic) take centre stage (Maesschalck & Bertok, 2009). The expectation is that such a deficit will be less likely in organizations that commit themselves to systematically monitor, evaluate and adapt their ethics management instruments. A few models (see below) also provide specific guidance on the appropriate sequence for the introduction of particular ethics management instruments.

Grassroots participation

While the above discussion of the characteristic 'interconnectedness' addressed the interdependence between deliberately designed management instruments and units, this fourth characteristic, 'grassroots participation', focuses on the involvement of self-organized groups or individuals in ethics management. We first address employee participation and then grassroots participation from outside the organization.

Probably one of the most outspoken concerns in recent publications on IMS is the importance of participation of employees within the organization. At least three arguments for increased employee participation are provided. The first stems from a broader critique of the tendency of many models to emphasize control (Tremblay et al., 2017). Stansbury and Barry (2007), for example, explain how an ethics program can raise the 'specter of indoctrination', i.e. a "learned unwillingness to consider the relative limitations of a system of thought" (Stansbury & Barry, 2007, p. 248). This can generate reactance and possibly resistance among employees, thus undermining the very goals of ethics management. Through this emphasis on control, integrity management can also reduce individual employees' ability to manage ethical ambiguity, thus leading to atrophy of competency (Stansbury & Barry, 2007, p. 253). Stansbury and Barry (2007) hypothesize that such perverse effects of integrity management can be

avoided by allowing for more participation, for example by allowing employees sufficient discretion or organizing regular criticism of the ethics program itself.

The second argument for increased employee participation is more pragmatic, as it focuses on how such participation can improve the quality and effectiveness of an IMS. Through participation, individual employees can express their needs (Tremblay et al., 2017) and this can in turn increase the chance that the IMS will address the issues employees really struggle with, thus making it more effective. Participation can also strengthen a sense of ownership (Andersson & Ekelund, 2022, p. 1096) of the ethics management measures, thus strengthening the willingness of employees to cooperate with their implementation.

The third argument in favour of employee participation is less pragmatic and more fundamental. Anechiarico and Segal (2020) discuss the growing role of 'employee activists' who use traditional means such as petitions, strikes and walkouts in combination with the power of social media to express, often ethical, concerns about their organization. A rigid, top-down IMS might not be able to use the many positive effects of such activism or might even suppress it. In the public sector, this issue is even more acute, particularly in a period of democratic backsliding. A populist regime might impose ethically dubious or straightforwardly unethical policies, demanding 'integrity' (but actually meaning 'obedience') in carrying out those policies (Anechiarico & Segal, 2020, p. 281). Thus, an IMS should allow employees sufficient voice and participation so as to withstand such pressures.

Similar arguments can be made for grassroots participation from outsiders (e.g. Tremblay et al., 2017). Indeed, it can help to improve the quality of the IMS itself. For example, taking activists from outside the organization seriously and giving them voice, also in the development and the implementation of an IMS, can help to prevent damaging policies. In some cases inside and outside participation can overlap. For example, the societal #MeToo movement against sexual abuse and harassment can provide support for bottom-up pressures within the organization to improve the IMS.

Table 1: Recommendations based on the four characteristics of an Integrity Management System: aims and means

Characteristic	Aim	How
Interconnectedness	Create synergies and avoid decoupling	Coordinate at three levels: (1) within ethics management, (2) between ethics management and the organization's broader internal environment, and (3) between ethics management and the organization's external environment
Requisite variety	Be comprehensive and pluralist	(1) Ensure a sufficiently broad scope and (2) balance the various categories of ethics management (e.g. of the rules-based and values-based approaches)
Processual perspective	Avoid implementation deficits and adapt flexibly to changing circumstances	Consider ethics management as a dynamic and iterative process (e.g. as represented in the Deming cycle)
Grassroots participation	Avoid excessive control, ensure psychological ownership, and benefit from bottom-up input	Involve employees as well as external self-organized stakeholders in decision making

3. Some integrity management system models

Having discussed the characteristics of an IMS, we can now turn to a number of IMS models. By means of illustration, we discuss five such models. As mentioned above, while some of these do not explicitly refer to the systems approach, they all share at least to some degree the four characteristics discussed above. What the discussed models also have in common is that they have been described in English and refer at least to some extent to academic literature as a basis for the model and/or have been evaluated. As Lašáková et al. (2021) point out, most models are not developed on the basis of empirical research. Some authors (e.g. Kaptein, 2009) draw their model from guidelines of international organizations or national governments, others build it based on a review of the literature (e.g. Martineau et al., 2017). Many of these models have been applied in various organizations. Essentially, these models are prescriptive, offering recommendations that are to be followed to prevent unethical behaviour and promote ethical behaviour. Some have also been used to describe ethics management and a few studies have attempted to empirically evaluate some of these models (see below).

The discussed models also have in common that they have a broad application as they are not restricted to one particular type of organization in one particular field (e.g. police, health, business). The selected models also all aim at a broad outcome. They do not focus on one type

of behaviour, such as bullying, corruption or deception, but aim to reduce integrity violations more generally. Finally, it is also important to emphasize that all discussed models are designed for organizations that function in a stable, democratic environment. They can probably not simply be applied in a hostile, deeply corrupt environment without serious adaptations.

We start the discussion with two models originating from the work of two international organizations, an NGO (Transparency International) and an intergovernmental organization (OECD). We then turn to a relatively new model that is explicitly designed as a critique of the previous two models: the pluralistic ethics management framework. We then discuss Kaptein's ethics program model and conclude with the Dutch 'integrity infrastructure' model. While most of these models originated in the context of the public sector, they are all also relevant for the private sector and NGOs. It is important to reiterate that these are just a few illustrations. There are many other models that also take a systems perspective and could also have been discussed, including standardized models such as the ISO Compliance Management Systems (ISO 37301, 2021).

Organizational integrity system (OIS)

The most obvious model to start this list of illustrations is, of course, the model that has 'integrity system' in its very name. It is originally drawn from the 'National Integrity System', coined by Pope (1996, 2000) for Transparency International. The National Integrity System is represented as a 'Greek temple' consisting of pillars that refer to crucial actors in corruption prevention at national level such as the executive, independent anti-corruption agencies, or civil society. Thus, the National Integrity System focuses on the broader system and tends to consider what happens within organizations as a black box (Six & Lawton, 2013, p. 648). That is very different for the adaption of the National Integrity System to the Local Integrity System (Huberts & Six, 2012; Six & Lawton, 2013), which has been applied in a seminal study in seven cities across the world (Huberts et al., 2008) and within several Dutch municipalities (e.g. Van den Heuvel et al., 2017). The Local Integrity System does explicitly theorize the components of ethics management within the organization while also addressing the broader environment. Six et al. (2012, p. 366), for example, distinguish between the internal (i.e. operational and corporate) level of the system on the one hand and the external level on the other.

Our discussion here focuses on the internal side and hence on the organizational integrity system (Huberts, 2014, pp. 190–197; Huberts & van Montfort, 2020) model or the OIS model. This model draws from the NIS en LIS studies, but also from broader research on ethics and integrity management as well as more specific studies of particular instruments. The OIS model has evolved over time, mainly as part of studies into the broader LIS. A recent comparative study on the LIS of three cities in three Western European countries particularly emphasized the intra-organizational part of the LIS and hence the OIS (Hoekstra et al., 2021, 2022).

With the OIS taking an explicit systems approach, the four characteristics of an IMS are clearly present. First, the notion of interconnectedness is strongly emphasized in all OIS studies. Importantly, it not only emphasizes the interconnectedness among the ethics management

instruments per se, but also much broader, both within and outside the organization. As for the former, Six et al. (2012), for example, conceptualize a 'corporate' level that includes internal units such as audit, risk management, security as well as e.g. human resources and finance. Hence, the efforts these actors make to strengthen integrity are fully included in the model. The model also particularly emphasizes the important coordinating role of integrity officers. Second, as for requisite variety, the OIS identifies six elements that are all said to be essential for an integrity management system to be complete: awareness of the integrity issue, clarity about integrity and integrity management, ethical leadership, a strategy that balances rules-based and values-based approaches, specific integrity measures (e.g. ethics codes, training, procedures for reporting violations, and integrity risk assessment tools), and critical reflection on what matters and what works. An assessment framework further specifies each of these elements in a number of indicators (Hoekstra et al., 2021, pp. 87–88). Third, with its emphasis on critical reflection, the OIS model also takes a processual perspective. It prescribes periodical monitoring and evaluation of the implementation of the measures as well as of their effectiveness, with the aim to continuously improve. Six and Lawton (2013) also include this dynamic element in the conditions of their configurational theory of integrity systems. Fourth, as for grassroots participation, the OIS model acknowledges the importance of the involvement of internal key actors. Less developed is the active participation by other employees as well as the involvement of external grassroots stakeholders.

Integrity management framework (IMF)

The integrity Management Framework or IMF was developed for the OECD by Maesschalck and Bertok (2009). It has been applied on political parties in Sweden (Andersson & Larue, 2022), on the Swedish public sector (Andersson & Ekelund, 2022), on British local government (Macaulay et al., 2014), on Brazilian local government (De Bona, 2022), and in sports management (Maesschalck & Vanden Auweele, 2010; Robertson & Constandt, 2021). It was also used to organize a literature review on financial fraud (Gotelaere & Paoli, 2022).

Maesschalck and Bertok (2009) argue that, for an ethics management framework to be effective, it needs to implement a number of instruments, establish processes, and anchor ethics management in the organization through structures. Together, these are considered the three pillars of the IMF.

The first pillar consists of a number of ethics management instruments (Maesschalck & Bertok, 2009, pp. 28–59). These are organized according to their function for ethics management. Rather than simply accumulating as many instruments as possible, organizations should only apply those instruments that really contribute to the fulfilment of those functions in the particular context of their organization. These functions are determining and defining integrity (e.g. risk analysis, ethics codes), guiding to integrity (e.g. training, communication, leadership), monitoring integrity (e.g. surveys, whistle-blowing systems), and enforcing integrity (e.g. disciplinary sanctions). The second pillar of the IMF consists of processes. These should be established to make sure that the instruments are not only implemented, but also evaluated and, if necessary, adapted. The third pillar concerns the structural anchoring of ethics management. This of course refers to appointment of 'integrity actors' (e.g. integrity coordinators, compliance officers, ethics bureaus,...) for whom ethics management will be

their main responsibility. Yet it also refers to important role of all managers and to the role of those who are responsible for management instruments that are not at the core of ethics management, but are nevertheless important to achieve the goals of ethics management such as Human Resources or the legal department.

The four system characteristics can indeed be recognized in the IMF. First, as for the interconnectedness, Maesschalck and Bertok (2009) emphasize a holistic approach looking at the framework as whole. They emphasize the importance of coordination among the ‘core’ integrity management instruments as well as coordination with ‘complementary instruments’. The latter do not have integrity as their main goal, but are nevertheless crucial to achieve the goals of ethics management (e.g. recruitment or procurement procedures). Maesschalck and Bertok (2009, pp. 23–27) also see the IMF as an open system, embedded in a wider context. Second, as for requisite variety, they recommend to combined rules-based and values-based approaches for all four functions. Third, with ‘development processes’ as one of its three pillars, the IMF clearly embraces the processual and iterative nature of ethics management. It also provides some suggestions for the sequence with which instruments can be introduced. For example, it proposes to emphasize the rules-based approach when ethics management is introduced following a corruption scandal and to emphasize the values-based approach when ethics management is introduced as preventative measure independent of any scandal (Maesschalck & Bertok, 2009, p. 60). Fourth, as for grassroots participation, there is a recommendation to consult staff and stakeholders, e.g. when formulating ethical standards (Maesschalck & Bertok, 2009, pp. 31–34), but this remains limited.

Integrity Infrastructure

The Integrity Infrastructure was originally developed in 2006 at Nyenrode Business University in close cooperation with the Dutch Ministry of the Interior (Hoekstra & Karssing, 2007). It builds on academic literature and practical experience and has evolved over time with its last version being published recently (Hoekstra & Zweegers, 2022, pp. 10–15). The model is essentially defined by seven elements, represented as an atom. At the core is the element ‘coherence & coordination’. This is surrounded by leadership & strategy, values & standards, rules & procedures, personnel & culture, reporting & enforcement, and monitoring & accountability. It comes with a 35-item questionnaire (‘quick-scan’), with five questions for each of the seven elements, that can be used to assess the comprehensiveness of an ethics management system in an organization, which has been used in more than 500 organizations (Hoekstra, 2022).

The Integrity Infrastructure model addresses the four characteristics of an IMS. With its ‘coherence & coordination’ as core of the atom, it clearly considers interconnectedness as crucial. The model strongly emphasizes the importance of coordination with the many actors that have a role to play in ethics management. For this coordination, it particularly emphasizes the role of a central coordinating function, for example in the form of an integrity office(r). The latter should operate like a spider in a web ensuring internal coherence. The model also implies requisite variety as it prescribes that organizations should sufficiently develop all seven elements. Its 35-item quick scan can help organizations with this. The processual aspect of the model is expressed by the ‘monitoring & accountability’ element, intended to “track its process and operation” with the aim to improve (Hoekstra & Zweegers, 2022, p. 12). Finally,

like the OIS and IMF models, the integrity infrastructure model does indeed address some aspects of grassroots participation, but this remains limited.

Pluralistic ethics management framework (PEMF)

At the core of the ‘pluralistic ethics management framework’ (Martineau et al., 2017; Tremblay et al., 2017) or PEMF is a new, sixfold, classification of ‘ethics practices’: normative practices (e.g. ethics codes), detection practices (e.g. whistle blowing protection), structural practices (e.g. ethics officer), social and environmental responsibility practices, consultation and participation practices, and experiential ethical development practices (Tremblay et al., 2017, p. 227). This is presented as a ‘pluralistic’ alternative to the traditional rules-oriented vs. values-oriented dichotomy, which is not only deemed too simple, but also seen as based on a flawed understanding of the underlying motivation mechanisms (Tremblay et al., 2017, pp. 224–226).

The PEMF is also explicitly presented as an improvement of earlier models and particularly the IMF, because it presents a broader array of instruments. The model’s ‘pluralistic’ approach implies that all six orientations should be in the balance: their instruments should be present to some degree, without none of them dominating (Martineau et al., 2017). A comparison of the PEMF’s practices with the IMF’s instruments shows that many of the former also feature in the latter. In contrast to what Tremblay et al. (2017, pp. 227–229) maintain, the IMF, like many of the other discussed models, not only refers to instruments at individual level, but also to instruments that Tremblay et al. (2017) situate at the ‘collective’ or ‘strategic’ level such as the organization of surveys on ethics (an instrument under IMF’s function ‘monitoring’) or the appointment of an advisory ethics committee and ethical leadership (both mentioned in the IMF ‘s pillar ‘structure’) (Maesschalck & Bertok, 2009).

Some of PEMF’s practices are not in the core of the IMF, but are mentioned as complementary instruments of ethics management. There are also a few practices that are mentioned in the IMF, but with less emphasis than in PEMF, such as participation and empowerment practices. Finally, a few practices seem to be specific to the PEMF and are (almost) entirely absent from the IMF and other models. Most notable is the category ‘experiential ethical development practices’ (Tremblay et al., 2017), which includes practices such as artistic training, mind-body approaches and spiritual practices. In the PEMF model, these are considered instruments of ethics management per se and not instruments of a relevant adjacent area (e.g. employee wellbeing, health and safety), as they might be considered in most other models. The same goes for some practices under the PEMF model’s ‘social-environmental orientation’ such as the commercialization of fair trade products or the promotion of sound environmental practices such as recycling or energy conservation (Martineau et al., 2017, p. 802).

Martineau et al. (2017) provide empirical support for the model. Drawing from research as well as practice, they developed a questionnaire to measure the six orientations, which was validated in a survey among employees in eight Canadian organizations. They also find that organizations with more requisite variety are indeed perceived to have better ethical performance.

The PEMF particularly emphasizes two of the four characteristics of an IMS. 'Requisite variety' is mentioned explicitly as a core characteristic (Martineau et al., 2017; Tremblay et al., 2017), particularly applied on its six groups of instruments. Likewise, with 'participation-consultation' as one of its six orientations, it clearly emphasizes participation. Martineau et al (2017) rightly present this as an advantage over other models and particularly the IMF. As for the processual perspective, the PEMF does not explicitly theorize a PDCA-type management cycle. Yet it does theorize and observe self-reinforcing dynamics that can lead a particular orientation to become dominant and thus undermine requisite variety (Martineau et al., 2017, p. 808). Likewise, the issue of interconnectedness is not explicitly addressed. To some extent, the PEMF avoids the issue of interconnectedness between integrity management instruments and instruments of adjacent fields by expanding the scope of ethics management to practices that other models would rather situate in adjacent fields such as employee wellbeing or corporate social responsibility.

Kaptein's Ethics Program model

Kaptein's (2009, 2015) 'ethics program' model distinguishes between nine different 'components' of ethics programs: a code of ethics, a dedicated ethics officer or office, formal ethics training and other types of communication, an ethics hotline, policies for accountability for unethical behaviour, investigation and corrective policies, policies on incentives and rewards for ethical behaviour, internal monitoring and ethics audits, and pre-employment screening. He assessed the model in two studies, both based on a survey among a large group of employees in the US.

The first study (Kaptein, 2009) assessed the impact of the nine components on eight 'corporate ethical virtues' (Kaptein, 1998), which might also be seen as eight functions or aims of ethics management (Kaptein, 2009, 2015): clarity about what is expected, role-modelling behaviour by management, role-modelling behaviour by supervisors, feasibility (i.e. providing those resources employees need to behave ethically), supportability (i.e. stimulating identification with and commitment to ethical expectations), transparency about (un)ethical behaviour and its consequences, discussability of ethical issues, and sanctionability of unethical behaviour. The combination of these eight corporate ethical virtues indeed turned out to be impacted by the components of the ethics program, with the exception of pre-employment screening. Interestingly, when looking more in detail at the impact of the individual components on the individual ethical virtues, Kaptein (2009) found that some components have a positive impact on some virtues while having a negative impact on other virtues. He therefore concluded with the recommendation to managers to be very clear on what (in terms of the eight corporate virtues) they want to achieve, because their goals might be variously impacted by various instruments.

The second study (Kaptein, 2015) assessed the impact of the nine components on unethical behaviour. Again with the exception of pre-employment screening, Kaptein found all other eight dimensions to either directly or indirectly impact unethical behaviour. He concluded that an IMS should therefore include those eight components. Interestingly, the 2015 study also investigated the impact of the order in which the various components are introduced, leading Kaptein to recommend a particular sequence.

The model has also been applied in other studies. Molina (2018), for example, applied it to analyse a particular case in the US (albeit referring to it as the organizational integrity systems approach).

As for interconnectedness, the first of the four IMS characteristics, Kaptein (2015) not only theorizes synergies but he also identifies empirical examples of this when finding higher interaction effects: components who had no separate effect on unethical behaviour turned out to have an indirect effect (p. 425). Kaptein's model also embraces requisite variety, pointing at the importance of all components (with the exception of pre-employment screening) and thus of a sufficiently broad scope. By noting that some components have more impact than others and that some components might even have a negative impact, he adds to this a complexity and nuance that is not present in the other models. Kaptein's model also addresses the processual nature of ethics management by including this in the component 'internal monitoring and ethics audits'. Yet he goes beyond this, by proposing a particular sequence for the introduction of the components that takes into consideration their relative importance (the more important, the earlier it should be implemented) and their relative dependence (Kaptein, 2015). Finally, while there are some references to grassroots participation (e.g. in the corporate virtue 'discussability') this is the least developed characteristic of the four IMS characteristics.

4. Concluding reflections

This chapter focused on those integrity management models that take a systems approach. It identified four characteristics of a systems approach (interconnectedness, requisite variety, a processual perspective, and grassroots participation) and then discussed five examples of models that, at least to some extent, exhibit these characteristics. The discussion of these models suggests some reflections and recommendations.

First, there clearly is variation in the delineation and operationalization of ethics management systems. As for the operationalization, while each model has its own classification of instruments, there are many similarities between the actual categories. Further research that would compare the internal consistency of these classifications would be useful. As for the delineation, most models seem to have a similar scope of what is included in ethics management and what is not, with the IMF explicitly introducing a grey zone of 'complementary' instruments. The PEMF is an exception as it proposes to strongly push the boundaries of what ethics management is, expanding it to issues that are commonly considered to be in adjacent fields such as employee wellbeing and sustainability policies. The question is whether, in the long run, such an ever expanding scope will not weaken the focus of ethics management (when everything is ethics, ultimately nothing is specifically ethics) and whether this will not generate unproductive turf fights with those responsible for those other fields. We would argue in favour of a more narrow focus for ethics management itself, but with close cooperation and coordination with adjacent fields.

Second, one of the most important characteristics of the systems approach is the 'requisite variety' maxim. Many models essentially reduce this advice to a simple indicator of scope: the more of the prescribed components an organization has, the better. Arguably, this requires much more nuance, particularly from the perspective of parsimony. Are all these components

(however they are classified) really necessary? As Kaptein (2015, p. 419) points out, the more components a system already has, the more overlap there might be and the less added value a new component might bring. At some point, the piling up of components might even have adverse effects (see below). Perhaps the absence of a component can be compensated for by the strengthening of another component? Perhaps the synergy effects that the requisite variety maxim hypothesizes might make it less necessary that all components are present? To answer these questions, we will need sophisticated research, e.g. through multivariate analyses that not only assess the combined impact of ethics management components but also their interaction effects. Kaptein's (2009, 2015) and Martineau et al.'s (2017) studies offer some initial examples of such studies, but this deserves further development, both in quantitative and qualitative research. Moreover, such research should not only focus on the mere presence or absence of IMS components, but also address the nature of these components. It is not enough to merely have, say, ethics training or a whistle-blowing policy, the actual shape these instruments take, both on paper and in practice, is at least as important.

Third, as Kaptein (2015) convincingly argues, it is also important to look at the actual sequence in which the instruments are introduced. While some of the other models (most notably OIS (Six & Lawton, 2013)) recognize this as well, Kaptein's (2015) is most explicit in prescribing, based on his empirical research, a specific order in which the components of his model should be implemented. While this provides an interesting starting point, this deserves further development and nuance. A case in point is Kaptein's (2015) recommendation to introduce investigation and corrective policies relatively late in the process. While this might be good advice for most situations, those organizations who introduce ethics management immediately following a major scandal might first want to emphasize the more rule-based approach (Maesschalck & Bertok, 2009, p. 60).

The latter example is an illustration of the fourth recommendation we would like to make, which concerns the importance of context. While most models do recognize that context plays an important role, this certainly deserves more theorizing and empirical testing. Again bearing parsimony in mind, one might find that particular components might be more important in particular contexts than in others. For example, the impact of the introduction of a whistle-blowing policy is likely to be very different depending on the degree of interpersonal trust within the organization. Likewise, the overall impact of the introduction of an IMS might be very different if it is introduced in the wake of a major scandal. The extra-organizational context is also likely to be very important. The same intervention could have very different effects, depending on the jurisdiction or the sector (e.g. banking, policing or sports) within which the organization is situated. More generally, such research would help to avoid the risk of exaggerating the impact of ethics management interventions. However important an IMS might be, there are many factors that might be at least as important to explain ethical or unethical behaviour of employees.

Fifth, future research into IMS should pay serious attention to the undesirable side-effects of ethics management. Some of the prescribed interventions might not only be ineffective, they might also have an adverse effect. Most discussed models explicitly address one such set of side effects: those generated by ethics management that is not appropriately balanced between the rules-oriented and the values-oriented approaches. Indeed, an overemphasis on

the rules-oriented approach can generate a culture of distrust and a general fear of making mistakes that hinders creativity in dealing with ethical dilemmas. Conversely, undue emphasis on the values-oriented approach might lead to abuse of trust or to chaos. Yet these are just two ways in which ethics management might backfire (Maesschalck, 2019). There are many other side effects to be taken into consideration. A case in point is the appointment of ethics office(r)s, as recommended by all models. While this has many advantages, it also creates the risk of developing a silo of ethics management professionals, residing in an ivory tower, perhaps even taking away ethical responsibility from line managers. Most models suggest to prevent this risk by ensuring that these integrity office(r)s take up a coordinating role. Whether they succeed in this of course depends on the extent to which the other actors are willing to be coordinated by the ethics officer, which in turn is likely to depend on the support of senior management. Such complications might help to explain Kaptein's (2009, pp. 273–274) finding that, in his sample, the presence of an ethics officer correlates negatively with perceived role-modelling behaviour of supervisors. This is just one example of an often recommended intervention that deserves more research into adverse effects, which in turn can generate a more nuanced versions of the IMS models. Given the complexities and contradictory mechanisms at play, in depth qualitative research might be at least as interesting for such research as quantitative research. Another set of undesirable side effects can occur when ethics is taken too seriously, leading to 'integritism' (Huberts, 2014), which occurs when ethics becomes too pervasive in the organization (Maesschalck, 2019, p. 163) or when 'integrity' is wrongfully used to damage people's reputation (Huberts, 2014, pp. 64–65). Such side-effects should also be taken on board by the IMS models.

Sixth and more broadly, further understanding of integrity management systems and their effectiveness, will require a view that goes beyond the limitations of this chapter. All the proposed models were developed in and for European and North American organizations. Inevitably, this implies a narrow focus and further research will have to look beyond this and assess the extent to which the observations and hence recommendations are relevant in a broader context. Likewise, further research on IMS should look beyond disciplinary borders and take into consideration insights from behavioral ethics, neuro-ethics and other relevant fields.

Given that IMS models ultimately aim to improve actual integrity management in organizations, it is appropriate to conclude this chapter with a reflection on practice. Most importantly, the concerns expressed above should not distract from the important improvements these models generated. They helped many organizations moving away from practices that often emphasized merely the rules-based approach and tended to overlook the importance of interconnectedness, requisite variety, the processual approach and participation. Many of the abovementioned texts offered very practical advice and, in the case of the IF, even an online assessment tool. Nevertheless, there remains room for improvement. Indeed, the abovementioned theoretical concerns will also be relevant to improve practice. In times when organizations face austerity, unpredictability and many other challenges, it will be very important for them to be economical with their resources. Hence, more nuanced models that specify which elements are really necessary under which conditions and that take possible side-effects into consideration would be very welcome for practice as well as research. In fact, this would not only be relevant for managers and integrity professionals, but also for policy makers. For example, it might help legislators who, as they aim to impose ethics

management interventions on organizations, grapple with a difficult dilemma. On the one hand, they might want to develop detailed legislation with clear instructions on what organizations should do, so as to avoid window dressing. On the other hand, they also might want to formulate very vague legislation, allowing organisations to take measures that are adapted to the requirements of their specific context. Current legislation offers examples of both (de Sousa & Almeida, 2023). A systems perspective, based on the type of research proposed above, might offer a way out of this dilemma. Legislators might be relatively specific in prescribing an IMS, but leave the further development of the system to the organizations.

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