

The (in)completeness of local integrity systems A cross-sectional study on municipal integrity systems for civil servants in the Netherlands

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ABSTRACT

Private organizations and government bodies develop integrity systems that consist of various elements such as integrity officers, regulations, codes of conduct and supervision arrangements. For both the private and public sector there is little scientific knowledge about the extent to which local integrity systems are complete and factors that explain this (in)completeness. The present study focuses on local integrity systems for civil servants in the Netherlands. Using a theory-based evaluation framework it is concluded that Dutch municipal integrity systems differ substantially in terms of completeness. Contrary to our theoretical expectations, neither the number of inhabitants of a municipality nor the political composition of the municipal administration offers an explanation for this. The circumstance of whether or not a municipality is located in the most urbanized part of the Netherlands is, however, a relevant factor. The research findings open up challenging questions for future research on public and private integrity systems.

Keywords: integrity, local integrity systems, codes of conduct, municipalities, political composition local administration, urbanization

INTRODUCTION

For both government bodies and private organizations, integrity has become a core value in recent decades (Boatright, 2011; Six, Van der Veen & Kruithof, 2012; De Graaf & Macaulay, 2014). The subject of 'integrity' has also received increasing attention in scientific disciplines such as organization sciences, business administration and public administration (Huberts, 2014; Luu, 2015). This happens under the headings of business ethics (IBE, 2007) and public integrity (Huberts & Six, 2012).

Integrity in the private and public sector

It is understandable that private organizations pay more and more attention to the issue of integrity. Employees, works councils, supervisory boards and, above all, clients expect high integrity from private organizations. For example, customers are less willing to buy products from companies known as non-integral. Non-integrity behavior damages the image of a firm and has a direct negative impact on sales. The increased attention to integrity within private organizations is therefore understandable (Boatright, 2011; Muller, 2012).

In addition to private organizations, government agencies are also increasingly involved in the topic of integrity (Van den Heuvel, Huberts, Van der Wal, & Steenbergen, 2010). A government body that lacks integrity loses its legitimacy and trust among citizens (Musschenga, 2012; De Graaf, 2012; Den Boer, 2012). Without legitimacy and trust, a democracy cannot function optimally (Procee, 2000; Dreher & Schneider, 2010; Huberts, Van den Heuvel, & Van der Wal, 2012). Government organizations thus have a great responsibility in the area of integrity (Muller, 2012).

Because of the increased importance of integrity in the private and public sector, private and government organizations increasingly develop integrity system (Boatright, 2008; Huberts, Anechiarico, & Six, 2008; Six & Lawton, 2010; Six, Van der Veen, & Kruithof, 2012; Slingerland, Six, & Huberts, 2012). An integrity system safeguards and promotes integrity within an organization (Six & Lawton, 2010; Huberts & Six, 2012; Slingerland, Six, & Huberts, 2012). It consists of various elements such as integrity officers, regulations, codes of conduct and supervision arrangements. All these elements aim to contribute to the integrity performance of an organization (Huberts & Six, 2012; Slingerland, Six, & Huberts, 2012).

Although the subject of integrity is just as important for private organizations as for public organizations, this paper focuses on the integrity systems of the latter organizations, namely on those of municipalities. However, our findings on the quality of municipal integrity systems are also relevant for the private sector. As government bodies can learn from the business organizations in some respects (Osborne & Gaebler, 1992), the private sector can also benefit from public sector practices and insights on certain points.

Local integrity systems

For the public sector, a distinction can be made between national and local integrity systems (Van den Heuvel, Huberts, Van der Wal & Steenbergen, 2010). Local integrity systems are integrity systems of provincial government agencies, regional government agencies, water boards or municipal government agencies. Usually these are integrity systems of municipal government agencies. In this paper, the terms 'local integrity system' and 'municipal integrity system' are used as synonyms.

It is especially important for municipalities to pay attention to integrity (Six & Huberts, 2008). Citizens form opinions about the government based on their experiences at the local level (BZK, 2003; Huberts & Six, 2012). Municipalities are responsible for decision making and service provision in areas that are known for their vulnerability to integrity violations (Six & Huberts, 2008). Furthermore, contact with society is the most intensive, direct and sometimes intertwining at the local level (Van den Heuvel & Huberts, 2003). This makes it important for municipalities to have an effective integrity system (Van den Heuvel & Huberts, 2003; Six & Lawton, 2010; Slingerland, Six, & Huberts, 2012).

A local integrity system is considered *effective* when integrity risks are properly curtailed. This happens when the system ensures that integrity is handled and integrity risks are avoided (Six & Lawton, 2010). For an effective integrity system, an important requirement is the *completeness* of the system. All elements must be present that can promote the integrity performance of the municipal organization (Slingerland, Six, & Huberts, 2012; Habib-Ranzijn, 2015; Van den Heuvel, Huberts & Van Montfort, 2017).

A distinction can be made between local integrity systems for municipal *public administrators* such as city council members, aldermen and the mayor on the one hand and local integrity systems for *civil servants* on the other. This paper focusses on the second type of integrity

systems. It pays attention to local integrity systems for civil servant, regardless of whether these officials work in departments 'in the town hall' or in outside departments such as the Construction and Housing Department. Semipublic municipal organizations as public schools and public transport companies are, however, left out of consideration.

In addition, a distinction can also be made between internal and external elements of a local integrity system. (Muller, 2012; Slingerland, Six, & Huberts, 2012). The external elements relate to, amongst others, external audit institutions, the police and judiciary, and the media. The internal elements pertain to, amongst others, internal regulations, integrity training programs, and ethical leadership (Slingerland, Six, & Huberts, 2012). This paper pays attention exclusively to the internal elements of local integrity systems (for public servants).

Central government has left individual municipalities a lot of freedom for developing their own local integrity systems. As a result, municipalities might differ from each other in terms of the completeness of these systems (Muller, 2012). So far, little research has been done on this specific topic.

Central research question

In the past decades, the scientific attention for (local) integrity systems has increased (Six & Lawton, 2010; Berndsen & Van Montfort, 2012; De Graaf, 2012; Huberts, 2012, 2015; Slingerland, Six, & Huberts, 2012; Quesada, Jimenez-Sanchez, & Villoria, 2013; De Graaf & Macaulay, 2014; Macaulay, Newman, & Hickey, 2014). A limitation of many existing studies, however, is that they are mainly descriptive or prescriptive in nature. They describe what the ideal integrity system looks like or should look like. It is rarely indicated from which elements the examined system actually exists. Another limitation of many existing studies is that they do not offer explanatory models which have been tested empirically and provide insight into how an integrity system actually functions (Six & Lawton, 2010; Slingerland, Six, & Huberts, 2012).

As a result, it is still largely unclear to what extent municipalities have complete integrity systems for civil servants. It is also unknown whether possible relevant situational factors such as the number of inhabitants of a municipality (Van den Heuvel, Huberts, Van der Wal & Steenbergen, 2010) and the political composition of the municipal council (Leek & Van Montfort, 2004), form an explanation for the (in)completeness of municipal integrity systems for civil servants.

These two gaps in the current scientific knowledge about municipal integrity systems prompted us to conduct a research project reported in this paper. The research project focused on the situation in the Netherlands in 2017. It was carried out from the following central question: *To what extent do Dutch municipalities have a complete integrity system for civil servants and to what extent does this relate to the size of the municipality and the political composition of the municipal administration?*

THEORETICAL FRAMEWORK

An important concept in our central question is integrity. Despite the fact that this concept 'is often used in literature and practice, it is not always clear what it exactly means (Six & Lawton, 2010; Addink, 2012; Tongeren, 2012; Van den Heuvel, 2012; Huberts, 2012, 2015).

Integrity

In this research, integrity is defined as "acting in accordance with the prevailing moral values and norms and the associated (game) rules" (Van den Heuvel & Huberts, 2003, p. 19; Van den

Heuvel & Huberts, 2010, p. 26; Huberts, 2005, p. 9). This definition leaves room for the existence of different interpretations of integrity, depending on time and place (Van den Heuvel & Huberts, 2003; Reynaers, 2012). Based on this definition, public administrators and civil servants show integrity if they fulfill their duties and functions in accordance with what is morally justified, measured against the moral norms, values and corresponding rules which are relevant at that time and in that context (Van den Heuvel, Huberts, Van der Wal & Steenbergen, 2010; Addink, 2012).

The opposite of integrity are integrity violations (Slingerland, Six, & Huberts, 2012). Because integrity violations can vary widely, a range of instruments and institutions are needed to address this diversity. This emphasizes the importance of thinking in terms of a 'system' (Slingerland, Six, & Huberts, 2012).

System approach

In recent years, the scientific literature has focused not only on integrity policy, but on the entire integrity system of an organization (Warburton & Baker, 2005; Huberts, Anechiarico, & Six, 2008; Six & Lawton, 2010; Huberts & Six, 2012; Six, & Huberts, 2012; Six, Van der Veen, & Kruithof, 2012; Slingerland, Six, & Huberts, 2012; Quesada, Jimenez-Sanchez, & Villoria, 2013; De Graaf & Macaulay, 2014; Macaulay, Newman, & Hickey, 2014). An integrity system is more extensive than just an integrity policy (Six & Lawton, 2010). Slingerland, Six and Huberts (2012, p. 220) define an integrity system as "the whole of components, such as institutions, policy instruments, actions in practice and integrity guards, whose aim is to contribute to the integrity performance of an organization in the heart of society".

A system approach looks at the larger picture by taking into account all elements and conditions that are expected to be important to the integrity of the organization (Six & Lawton, 2010). Such an approach focuses on the connection between various components within and outside the organization, how they are interconnected and how they are jointly responsible for the integrity performance of an organization (Kolthoff, 2012). Ideally, the integrity system at the *internal level* is organized in such a way that *external institutions* such as external audit agencies, ombudsman, the police and judiciary, and the media, do not have to take corrective actions (Slingerland, Six, & Huberts, 2012).

Effectiveness of an integrity system

The effectiveness of an integrity system is seen as the extent to which the systems manages to limit *integrity risks* (Six & Lawton, 2010; Slingerland, Six, & Huberts, 2012). Integrity risks concern actions, functions and work processes that are vulnerable from the point of view of integrity. It is highly probable that the most important integrity risks that need to be addressed in a local integrity system correspond with the main types of integrity violations (Six & Lawton, 2010; Van Tankeren, 2012).

The scientific literature does not clearly state what exactly creates an effective local integrity system (Six & Lawton, 2010; Slingerland, Six, & Huberts, 2012). Which combination or configuration of elements leads to the highest integrity performance? What are the underlying mechanisms that determine whether a certain combination is effective? These are questions that are currently unanswered.

Completeness of an integrity system

However, there are indications in the scientific literature that a complete integrity system is a necessary condition for a high system effectiveness. Many of all important internal or external elements of a integrity system must be present in order to have an effective system. The

completeness of an integrity system is considered an necessary condition for its effectiveness. (Slingerland, Six, & Huberts, 2012; Habib-Ranzijn, 2015; Van den Heuvel, Huberts, & Van Montfort, 2017).

The scientific literature does not contain a complete overview of the key internal and external elements that make up a complete integrity system. The vast majority of previous studies in the field of organisation integrity mainly or exclusively focus on individual elements of an integrity system (Vidaver-Cohen, 1995; Kaptein & Wempe, 1998; Bass & Steidlmeier, 1999; BZK, 2003; Treviño, Brown & Hartman, 2003; Van den Heuvel & Huberts, 2003; Brown, Treviño, & Harrison, 2005; Huberts & Nelen, 2005; BIOS, 2015a, 2015b, 2018; Ter Horst, 2008; Van den Heuvel, Huberts, Van der Wal, & Steenbergen, 2010; Van Tankeren, 2010, 2012; Heetman, Van Wayenburg, Guijt, & De Wit, 2011; De Graaf, 2012; Heres, 2012, 2015; Hoekstra, 2012; Huberts, Van den Heuvel, & Van der Wal, 2012; Maesschalck, 2012; Muller, 2012; Musschenga, 2012; Nelen, 2012; Van den Heuvel, 2012; Van der Wal, 2012; Van der Veer, 2012; Hoekstra, Makina, & Talsma, 2013; Van Montfort, Huberts, & Dees 2014; Huberts, Six, Van Tankeren, Van Montfort & Paanakker, 2014; Huberts, 2015; Zweegers, 2015; Tahalele, 2015; De Droog & Hoekstra, 2016; Faro, 2017; Talsma, Hoekstra, & Zweegers, 2017). Although most previous studies do not pay attention to integrity systems as a whole, they are useful because they make clear what separate elements of a local integrity system are important for guaranteeing and promoting integrity (Hoekstra, 2012). These studies can be used for making an overview of the important elements that should be present in a complete integrity system (Van den Heuvel, Huberts, & Van Montfort, 2017).

Evaluation framework

Based on the literature on separate elements of a local integrity system, we constructed an overview of key internal elements from which a complete local integrity system should exist. This overview of forty internal elements divided into thirteen categories is presented in Table 1. The overview constitutes an evaluation framework through which the completeness (and therefore indirectly the effectiveness) of a concrete local integrity system can be assessed.

Table 1: Evaluation framework for assessing completeness local integrity system

<i>Category 1: Attention to integrity</i>	
1a.	Municipal administrators pay a lot of attention to integrity within the civil service.
1b.	Managers pay a lot of attention to integrity within the civil service.
1c.	The subject of integrity is regularly discussed during work meetings within the civil service.
1d.	There is sufficient time and money to safeguard integrity within the civil service.
<i>Category 2: Regulations</i>	
2a.	There is a local regulation for the acceptance of gifts. This regulation is known to civil servants.
2c.	There is a local regulation for having ancillary positions This regulation is known to civil servants.
2e.	There is a local regulation for declaring expenses. This regulation is known to civil servants.
2g.	There is a whistleblowing regulation. This regulation is known to civil servants.
<i>Category 3: Codes of conduct</i>	
3a.	There are one or more formally established codes of conduct within the civil service.
3b.	Civil servants have been substantially involved in the realization of the code(s) of conduct.
3c.	The code or codes of conduct are known to civil servants.
3d.	The code or codes of conduct can easily be consulted by civil servants on the intranet.
<i>Category 4: Oath or official promise</i>	
4.	Civil servants usually take an oath or official promise after having been appointed.
<i>Category 5: Personnel policy</i>	
5a.	In application procedures, the availability of the required diplomas is usually checked.
5b.	In employment conditions interviews, the topic of integrity is usually addressed.
5c.	In periodical performance interviews, integrity is usually applied as an assessment criterion.
<i>Category 6: Integrity training programs</i>	
6a.	Civil servants regularly participate in an integrity training program.
6b.	Afterwards, one or more follow-up meetings usually take place.
<i>Category 7: Ethical leadership</i>	
7a.	Managers set a good example in terms of integrity.
7b.	Managers propagate the importance of showing integrity in the performance of tasks.
7c.	It is possible to discuss moral dilemmas present in the performance of tasks.
7d.	Managers call civil servants who behave inappropriately to account.
<i>Category 8: Risk analyses or vulnerability studies</i>	
8.	Within the civil service, risk analyses or vulnerability studies regularly take place.
<i>Category 9: Local integrity department or functionary</i>	
9a.	A local department or functionary coordinates and implements integrity policy.
9b.	This local department or functionary participates in an inter-municipal network in which knowledge and experiences in the field of integrity are shared.
<i>Category 10: Local contact point for reporting suspected integrity violations</i>	
10a.	There is a local functionary or department where civil servants can report suspicions of integrity violations by colleagues.
10b.	This local functionary or department is known to civil servants.
10c.	It is clear to civil servants what functionary or administrator decides whether the report about a possible integrity violation is a reason to start an internal investigation into this issue.

10d. It is clear to civil servants what functionary or administrator decides whether the results of the internal investigation will be communicated with the police.

Category 11: confidential counsellor

11a. Within the civil service, there are one or more confidential counsellors in the field of integrity and/or sexual harassment.

11b. The existence of one or more confidential counsellors is known to officials.

Category 12: registration and reporting

12a. Within the civil service, reports of suspicions of integrity violations are centrally registered.

12b. Within the civil service, actual integrity violations are centrally registered.

12c. There are annual management reports on the implementation of the integrity policy.

Category 13: integrity investigations

13a. There are internal investigations into high-profile suspicions of integrity violations on a regular base.

13b. When a punishment is imposed or another measure is taken in response to an internal or external investigation, the background of the measure is clearly communicated to civil servants.

With the aid of the abovementioned evaluation framework, it can be assessed to what extent a local integrity system has all the important internal elements from which a complete system should exist. It is to be expected that some local integrity systems will prove to be more complete than others. If that will turn out to be the case, then the question may arise to what extent these differences in the completeness of a local integrity system can be explained by factors such as the size of the municipality and the political composition of the municipal council.

Municipality size as possible explanatory factor

We assume that the factor 'municipality size' has a positive influence on the completeness of the entire integrity system (Longenecker, Moore, Petty, Palich, & McKinney, 2006; Hoekstra, 2012; Downe, Cowell, & Morgan, 2016; Koolma, Hulst, & Van Montfort, 2017). The size of a municipality can be expressed in the number of its inhabitants. International research shows that large municipalities are probably better equipped to tackle integrity issues than small municipalities (Downe, Cowell, & Morgan, 2016). The integrity systems of large municipalities may therefore be more complete. This assumption leads to the following hypothesis:

H₁ = As a municipality has more inhabitants, the municipality has a more complete integrity system.

Political composition of municipal administration as possible explanatory factor

Moreover, we assume that the extent to which non-national political parties are represented in the municipal administration has a negative influence on the completeness of the municipal integrity system (Van de Graaf & Hoppe, 1992; Berman & West, 1995; BZK, 2003; Hiironen, 2004; Leek & Van Montfort, 2004; Van den Heuvel, Huberts, Van der Wal, & Steenbergen, 2010; Huberts & Six, 2012; Slingerland, Six, & Huberts, 2012; Kremer, 2013; Luu, 2015; Brandsma & Kieskamp, 2018; Broersma & Lacon, 2018; De Bruin, 2018; Koster, 2018; Van Loon & Van de Wiel, 2018; Van Ruiten, 2018). This possible explanatory factor refers to the extent to which non-national political parties are represented in the municipal council (i.e. the percentage of council members from non-national political parties). It also refers to the extent to which non-national political parties are represented in the college of mayor and aldermen (i.e. the percentage of aldermen from non-national political parties).

Dutch central government has obliged municipal administrations to develop local integrity systems. Central government has also made some specific system elements such as offering integrity training programs and taking an oath or promise, mandatory for municipal administrations. Nevertheless, municipal administrations are provided with a lot of discretionary space for developing their own local integrity systems (Van den Heuvel, Huberts, Van der Wal, & Steenbergen, 2010).

We expect the 'administrative will' of a municipal administration to be a decisive factor in the extent to which the municipal administration complies with central government's obligation to develop a local integrity system and to include some specific elements in this system (Van de Graaf & Hoppe, 1992; Leek & Van Montfort, 2004). This 'administrative will' of a municipal administration is in turn probably dependent on the political composition of the municipal administration (Van de Graaf & Hoppe, 1992; Leek & Van Montfort, 2004).

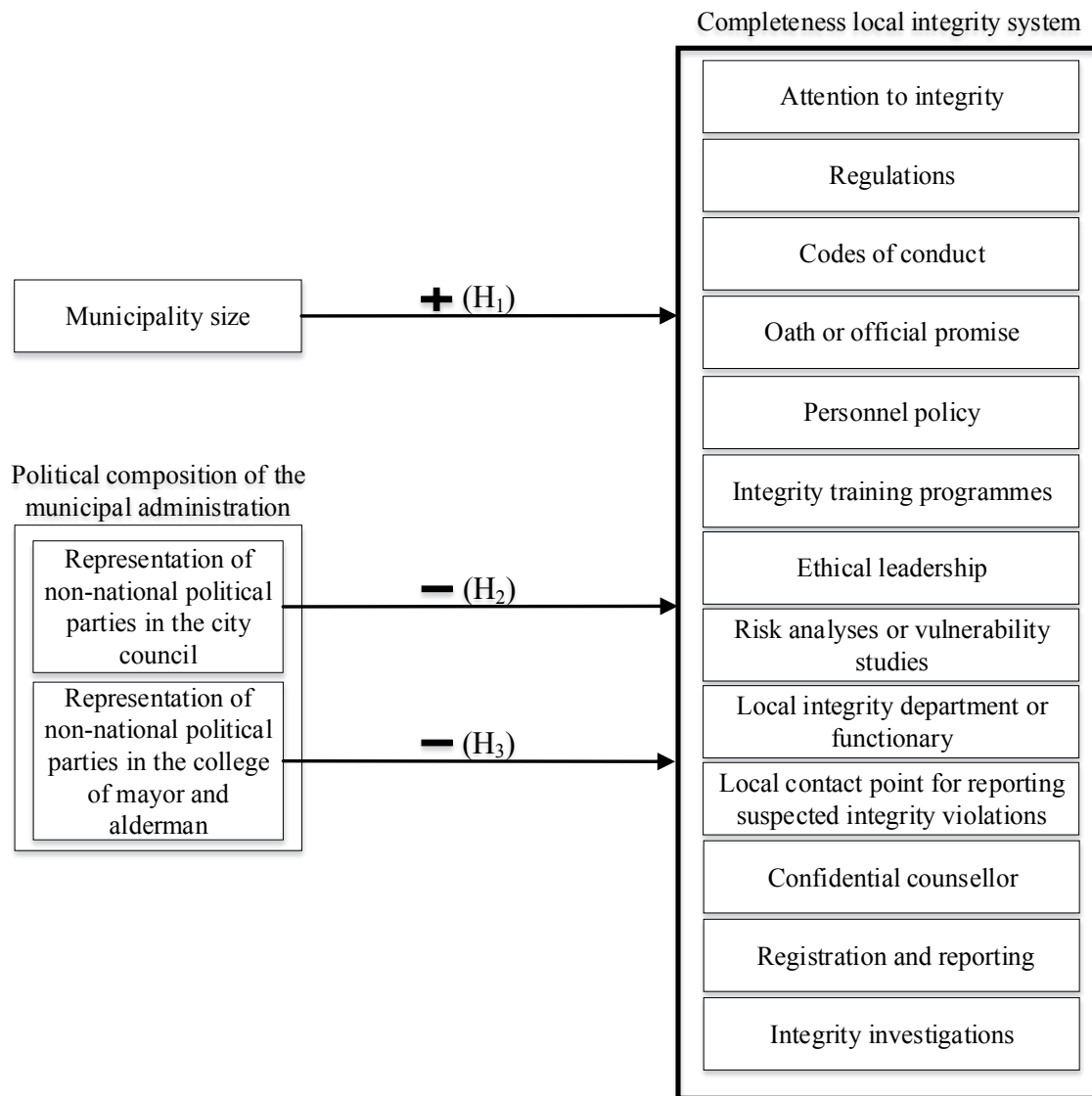
It can be assumed that municipal administrations in which non-national political parties are highly represented have a comparatively smaller 'administrative will' to develop a local integrity system and include some specific elements in this system. Non-national political parties focus more on what is going on among the local population. They are more practical and primarily interested in local problems (Broersma & Lacon, 2018; De Bruin, 2018; Koster, 2018; Van Loon & Van de Wiel, 2018). Municipal administrations in which non-national political parties are highly represented will therefore probably develop less complete local integrity systems than municipal administrations in which national parties have the upper hand. These theoretical assumptions result in the following hypotheses:

H2 = As the city council has more members of non-national political parties, the municipality has a less complete integrity system

H3 = As the college of mayor and alderman has more members of non-national political parties, the municipality has a less complete integrity system.

The above theoretical insights and hypotheses are presented in the form of a conceptual model in figure 1.

Figure 1: Conceptual model



DATA COLLECTION AND ANALYSES

The research includes an evaluating part and a hypothesis-testing part. First, it was evaluated to what extent the local integrity systems of Dutch municipalities consist of the elements that according to the literature should be present in a complete system. Subsequently, three hypotheses were tested on the extent to which the completeness of a local integrity system is related to the size of the municipality and to the political composition of the municipal administration. For both the evaluating part and the hypothesis-testing part of the research, use is made of a cross-sectional research design (De Vaus, 2001). In 117 local integrity systems, quantitative data on the current state of affairs have been collected.

Digital survey among all Dutch municipalities

The research data were obtained by means of a digital survey. The questionnaire for the survey consisted mainly of closed questions. The items in the questionnaire can be roughly divided into two groups. One group of items related to the system elements from the evaluation framework (presented above in Table 1). The other group of items pertained to the variables from the hypotheses. The way in which the local integrity system elements and the explanatory and control variables have been operationalized into the items of the questionnaire is described by Ogric (2018).

The digital survey took place in the spring of 2018 and covered the situation in 2017. The survey was conducted by the first author of this article and three fellow students from the Master's program in Public Administration at VU University Amsterdam in the context of their final graduation projects. The researchers were supervised by the second and third author of this article.

All 380 Dutch municipalities were approached by the researchers with the request to participate in the digital survey. Ultimately, 117 (31%) were involved in the survey.

Respondents, sample and representativeness

In most municipalities, the questionnaire of the survey was filled in by a policy officer (32.5%), a staff member (23.1%) or an legal advisor (11.1%).

Table 2: Occupations of respondents

Policy officer	32,5% (38)
Staff member	23,1% (27)
Legal advisor	11,1% (13)
Manager at the level of municipal secretary or department head	7,7% (9)
(Legal) controller	5,1% (6)
Manager at the level of team leader	4,3% (5)
Other	16,2% (19)
Total	100% (117)

Eventually, 117 respondents filled in the questionnaire of the survey on behalf of their municipalities. Table 3 shows the distribution of the municipalities by number of inhabitants. With regard to the number of inhabitants, the sample of 117 municipalities is representative of the total population of Dutch municipalities.

Table 3: Municipalities by number of inhabitants

Less than 20,000 inhabitants	21,4% (25)
20,000 to 50,000 inhabitants	47,9% (56)
50,000 to 100,000 inhabitants	20,5%(24)
100,000 to 250,000 inhabitants	8,5% (10)
More than 250,000 inhabitants	1,7% (2)
Total	100% (117)

Table 4 shows the distribution of the investigated municipalities to the political composition of the municipal administration. The table relates to the presence of council members from non-national political parties and the presence of aldermen from non-national political parties in local government. With regard to both aspects, the sample is not representative of the total population of Dutch municipalities. Municipalities where less than 20 percent of the council members / aldermen belong to non-national political parties are overrepresented in the sample.

Table 4: Municipalities by percentage of council members from non-national parties and percentage of alderman from non-national parties

	Council members	Aldermen
Less than 20 percent belong to non-national political parties	47,9% (56)	51,3% (60)
20 to 40 percent belong to non-national political parties	28,2% (33)	27,4% (32)
40 to 60 percent belong to non-national political parties	17,9% (21)	12,0% (14)
60 to 80 percent belong to non-national political parties	4,3% (5)	7,7% (9)
More than 80 percent belong to non-national political parties	1,7% (2)	1,7% (2)
Total	100% (117)	100% (117)

Data analysis

The survey data were analyzed using SPSS. In order to determine the degree of completeness of the local integrity systems investigated, descriptive univariate analyzes were performed, which resulted in tables with frequency distributions. To test the hypotheses, bivariate analyzes were first performed, resulting in cross-tabulations with Phi-values and corresponding p-values. Subsequently, multivariate analyzes were performed in the form of linear or logistic regression analyzes. In all statistical analyzes, a confidence interval of 95% ($p < 0.05$) was used.

RESULTS

What do the survey data tell us about the (in)completeness of local integrity systems? And to what extent do the factors from our hypotheses provide an explanation for this (in)completeness?

Presence of integrity system elements

Of the 40 elements from which a complete local integrity system should exist (See above in Table 1), 23 are found to a large extent in the sample of 117 integrity systems. The other 17 elements are found to a lesser extent in our sample. Table 5 shows what 5 elements were found in the largest number of investigated integrity systems ('top 5 popular elements') and what 5 elements were observed in the smallest number of examined integrity systems ('top 5 neglected elements'). The table starts with the most popular element and ends with the most neglected element.

Table 5: Percentage of local integrity systems in which a popular or neglected element is present

Element	Percentage systems
<i>Top 5 popular elements</i>	
There is a local regulation for the acceptance of gifts	100%
There is a local regulation for declaring expenses	100%
This regulation is known to civil servants	99,2%
There is a local regulation for having ancillary positions	98,3%
There are one or more formally established codes of conduct	98,3%
<i>Top 5 'neglected' elements</i>	
Within the civil service, risk analyses or vulnerability studies regularly take place.	29,8
Civil servants regularly participate in an integrity training program.	30,2
Afterwards, one or more follow-up meetings usually take place	35,3
There are internal investigations into high-profile suspicions of integrity violations on a regular base.	47,3
There are annual management reports on the implementation of the integrity policy.	44,8

(Missing cases = 4, 1, 0, 2, 0, 13, 21, 11, 7, 12)

So far, attention has been paid to the presence of individual system elements. We now switch to the integrity systems as a whole and assess the (in)completeness of these systems. To what extent do local integrity systems have the elements that they should contain according to our evaluation framework?

Completeness of entire integrity systems

In a large number of investigated integrity systems, no survey information is available about one or more system elements. The lack of information about a particular system element can have four causes: (a) the requested information was unknown to the respondent; (b) the respondent failed to answer the relevant survey question; (c) the answer to the survey question is not taken into consideration by the researchers, because that answer was inconsistent with an answer to another survey question; or (d) the question did not have to be answered by the respondent, because this question - given the answer to a previous survey question - did not apply to the integrity system on which the respondent was questioned. In case of one of the first three causes, there is a 'missing case'.

Because many examined integrity systems lack survey information about at least one system element, many municipal integrity systems would be dropped out of the analyzes if we would calculate a cumulative score for the total of all system elements. That is why we have created a new variable that calculates per integrity system the average score (i.e. arithmetic mean) for the total of all system elements. In doing so, we have disregarded the investigated integrity systems in which only less than 80 percent of the system elements are present. In other words, we only calculated an average score for the total of the system elements if there was survey information available about a sufficient number of system elements.

The average score calculated per integrity system is a good measure of the completeness of an integrity system. This average score ranges from 0 (indicating that all system elements from our evaluation framework are missing in the integrity system under review) to 1 (indicating that all system elements from our evaluation framework are present in the system under investigation). We distinguish four categories of local integrity systems according to the extent of their completeness:

- *very incomplete* integrity systems, in which less than 50 percent (average score < 0.50) of the system elements from our evaluation framework are observed in the examined integrity system;
- *incomplete* integrity systems, characterized by the fact that 50 to 70 percent (0.50 < average score < 0.70) of the system elements from our evaluation framework are found in the investigated integrity system;
- *complete* integrity systems, in which 70 to 90 percent (0.70 < average score < 0.90) of the system elements from our evaluation framework are observed in the integrity system under review;
- *a very complete* integrity system, characterized by the fact that more than 90% (average score > 0.90) of the system elements from our evaluation framework are found in the integrity system under investigation.

Table 6 shows that 45.3% of Dutch municipalities have a very incomplete or an incomplete integrity system. A small majority (54.7%) of municipalities have a complete or a very complete integrity system.

Table 6: Local integrity systems classified according to their completeness

Very incomplete	2,8% (3)
Incomplete	42,5% (45)
Complete	50,9% (54)
Very complete	3,8% (4)
Total	100% (106)

(Missing cases = 11)

The fact that municipal integrity systems substantially differ from each other in terms of their completeness raises the question of whether these differences can be explained on the basis of the factors from our three hypotheses. Do the size of a municipality (hypothesis 1) and the political composition of the municipal administration (hypotheses 2 and 3) provide an explanation for the completeness of a local integrity system?

Testing of hypotheses

Contrary to what is expected in our hypotheses, the size of a municipality (expressed in the number of inhabitants) and the political composition of the municipal administration (expressed in the percentage of council members from non-national political parties and the percentage of aldermen from non-national political parties) are not associated with the completeness of the local integrity system. This is apparent both from the results of the bivariate analyzes and from the results of the multivariate analyzes.

The results in table 7 show no significant association between the size of a municipality and the completeness of its integrity system (Phi = 0.034, p = 0.3635). The results of the multiple logistic regression analysis also show that the size of a municipality is not significantly associated with the completeness of the local integrity system (B = 0.009, p = 0.4995).

Table 7: Municipality size in relation to completeness of local integrity system

	Few inhabitants	Many inhabitants
Incomplete system	50,7% (36)	47,1% (16)
Complete system	49,3% (35)	52,9% (18)
Total	100% (71)	100% (34)

(Missing cases = 12; Phi = 0.034, p = 0.3635)

According to Table 8, the percentage of municipal councilors of non-national political parties is not associated with the completeness of the municipal integrity system ($\Phi = 0.028$, $p = 0.386$). This picture is confirmed by the results of logistic regression analysis ($B = 0.006$, $p = 0.348$).

Table 8: Political composition of municipal council in relation to completeness of local integrity system

	Few council members of non-national parties	Many council members of non-national parties
Incomplete system	51% (26)	48,1% (26)
Complete system	49% (25)	51,9% (28)
Total	100% (51)	100% (54)

(Missing cases = 12; $\Phi = 0.028$, $p = 0.386$)

Table 9 shows that the percentage of aldermen of non-national political parties does not correlate with the completeness of the municipal integrity system ($\Phi = 0.066$, $p = 0.249$). The results of the logistic regression analysis also show that the political composition of the college of mayor and aldermen is not significantly associated with the completeness of the local integrity system ($B = 0.003$, $p = 0.415$).

Table 9: Political composition of college of mayor and alderman in relation to completeness of local integrity system

	Few council members of non-national parties	Many council members of non-national parties
Incomplete system	53,1% (26)	46,4% (26)
Complete system	46,9% (23)	53,6% (30)
Total	100% (49)	100% (56)

(Missing cases = 12; $\Phi = 0.066$, $p = 0.249$)

All in all, it can be concluded that our hypotheses are not confirmed by the research results. Is there perhaps another factor that explains the completeness of a local integrity system?

The relevance of a municipality's geographical location

The control variable 'geographical location' used in the statistical analyzes appears to be an important factor. With respect to this variable, a distinction is made between municipalities that are located within The Randstad and municipalities that are located outside. The Randstad is the most urbanized part of the Netherlands. This urban area is surrounded by the cities of Alkmaar, Amsterdam, Rotterdam and Utrecht. Of the 117 municipalities that participated in the digital survey, 28 are located within The Randstad and 88 are located outside (while the geographical location of one municipality is unknown).

The geographical location of a municipality is associated with the completeness of the local integrity system. Municipalities within The Randstad generally have a more complete integrity system than municipalities outside The Randstad. This can be seen in Table 10 ($\Phi = -0.178$, $p = 0.035$) and also appears from the results of the multivariate analysis ($B = -0.928$, $p = 0.0305$).

Table 10: Geographical locations of municipality in relation to completeness of local integrity system

	Located within The Randstad		Located outside The Randstad	
Incomplete system	34,6%	(9)	55,1%	(43)
Complete system	65,4%	(17)	44,9%	(35)
Total	100%	(26)	100%	(78)

(Missing cases = 13; Phi = -0.178, p = 0.035)

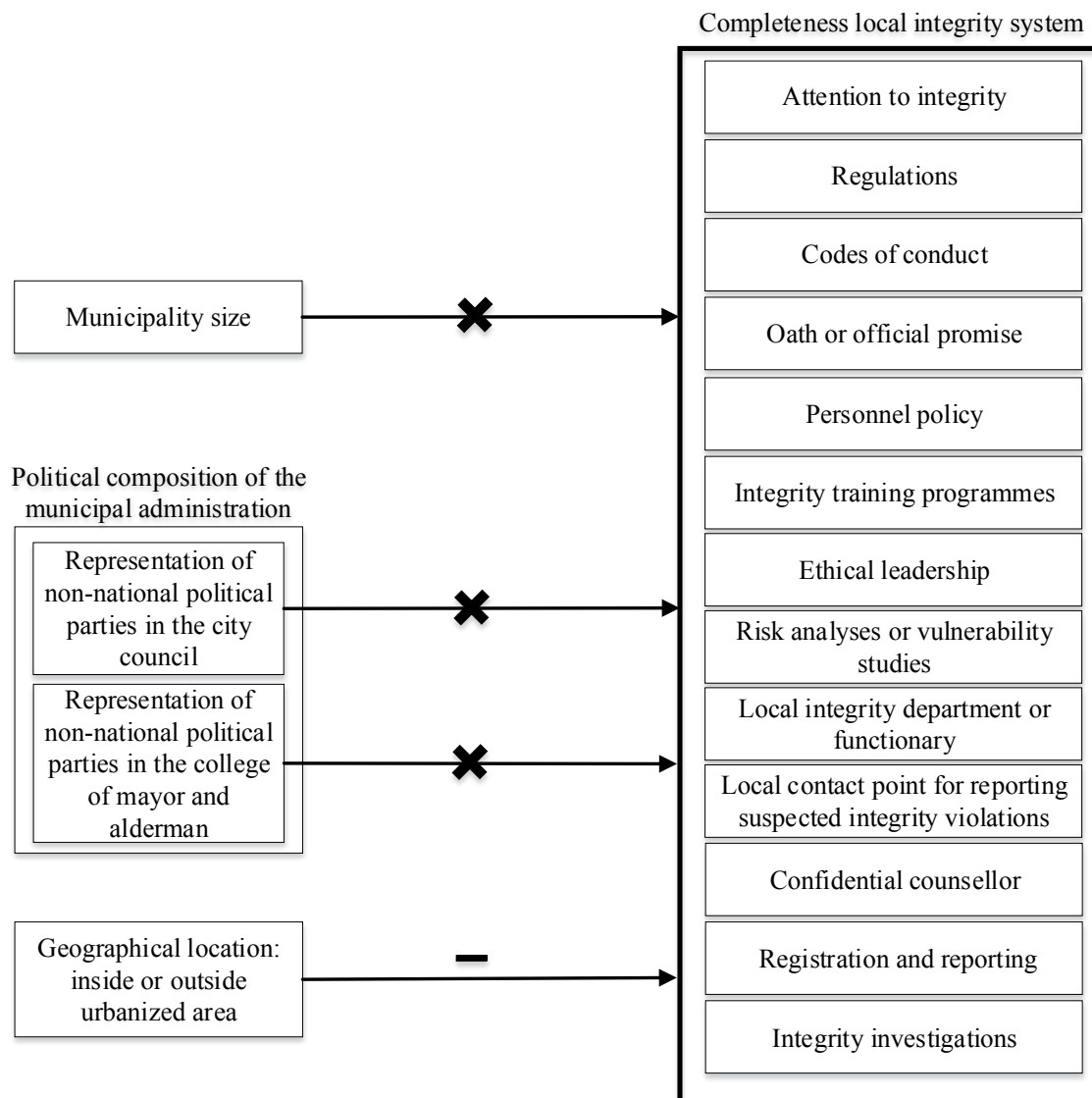
CONCLUSION AND DISCUSSION

The research data presented above make it possible to answer the central research question on the extent to which Dutch municipalities have a complete integrity system for civil servants and the extent to which this is associated with the size of the municipality and the political composition of the municipal administration.

First, it can be concluded that the completeness of the local integrity system varies considerably between Dutch municipalities. In some municipalities, for example, the integrity system consists of almost all elements that should be present according to our evaluation framework, such as a code of conduct, an oath or official promise and integrity training. Other municipalities have, however, a much less complete integrity system. The general picture is as follows: 3.8% of the municipalities have a very complete integrity system, whereas 50.9%, 42.5% of 2.8 % of the municipalities have a complete, incomplete system and very incomplete integrity system respectively.

A second conclusion is that the explanatory factors incorporated in our hypotheses, do not offer an explanation for the substantial differences between local integrity systems. Contrary to our theoretical expectations, neither the number of inhabitants of a municipality nor the political composition of the local administration is associated with the (in)completeness of the local integrity system. The circumstance of whether or not a municipality is located in the most urbanized part of the Netherlands proves, however, to be a relevant factor. These research findings give rise to an modification of the conceptual model presented at the end of the section on the theoretical framework. Figure 2 shows the modified conceptual model.

Figure 2: Modified conceptual model



A possible explanation for the relevance of a municipality’s geographical location may be that municipalities that are situated in highly urbanized areas have to cope with a more dynamic and complex social environment than municipalities in a rural area. In such a complex and dynamic environment there may be a greater need for regulations, procedures and structural controls with regard to the performance of public tasks (Dielemans & Musterd, 1991; Güler, 2018). This may explain the more complete local integrity system in highly urbanized areas.

Possibilities for improvement

Our research findings can serve as a benchmark for municipalities. A municipality can apply the comprehensive evaluation framework developed by us to its own local integrity system in order to determine the system’s (in)completeness. This (in)completeness can then be compared with the completeness of local integrity systems in general, of which an up-to-date picture has been outlined in this article

Furthermore, municipalities could start to pay attention to the following ‘top 5 neglected elements’: risk analyses or vulnerability studies on a regular base, regular participation of civil servants in integrity training programs, follow-up meetings after training programs on the regular base, internal investigations into high-profile cases on a regular base, and annual reports on the implementation of integrity policy. Many municipalities do not currently have

one or more of these elements. Getting started with the elements can be considered as picking low-hanging fruit.

These possibilities for improving the completeness and thereby the effectiveness of local integrity systems do not only exist in government agencies, but also apply to private organizations. There is little reason to assume that the requirements and actual situation regarding local integrity systems in the public sector differ significantly from the requirements and actual situation in the private sector. Just like public organizations, private organizations can use our research findings for a benchmark and immediately start adding the 'top 5 neglected elements' to their integrity systems.

Future research

Based on the literature, we constructed an overview of key *internal* elements from which a complete local integrity system should exist. We left out the external elements of an integrity system. Future research should preferably also take *external* elements of an integrity system into account. The completeness of the integrity system at the external level is also a necessary condition for an effective system (Slingerland, Six, & Huberts, 2012). Elements at the external level include, for instance, external audit agencies, local ombudsmen, the police and judiciary, and the media (Slingerland, Six, & Huberts, 2012; Six & Lawton, 2010). These external institutions can take corrective actions if the examined integrity system is of an insufficient quality at the internal level (Slingerland, Six, & Huberts, 2012).

Finally, a literature study could be done to examine where our evaluation framework should be slightly modified in order to become suitable for the private sector. This somewhat modified evaluation framework could subsequently be used in a cross-sectional survey among private enterprises. This way, it could be checked whether the situation in the business sector is indeed a bit more favorable than in the public sector, as suggested in a recent study (Talsma, Hoekstra & Zweegers, 2017).

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