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# Integrity Violations and Corruption in Western Public Governance: Empirical Evidence and Reflection from the Netherlands

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How often integrity violations occur in Western governance, and the precise nature of these violations, is as yet not very clear. Data on this subject—drawn from experience in the Netherlands—are presented here. The main research question is: What is the scale of integrity violations within Dutch public governance and what is the nature of these violations? The article provides the results of research on the perceptions of 7,315 Dutch civil servants who were surveyed on integrity violations in their work surroundings. All told, 2,035 respondents (nearly 28%) reported suspicion(s) of integrity violations in their direct working environment in the preceding two years. A substantial proportion of respondents said that they had experienced inappropriate and ill-mannered behavior and relatively “small” violations, such as profiting at the expense of the organization (fraud, abuse of resources) through noncompliance with working-hour regulations or by abuse of the organization’s resources. Integrity of governance in a Western context concerns corruption (and fraud), but there are indeed many other types of integrity violations that are prominent in the eyes of public sector employees. The moral quality of governance is thus also related to other values and norms than incorruptibility and impartiality. It seems important to incorporate this perspective into the fierce theoretical and practical debate on the corruption and integrity of governance.

**Keywords:** corruption, fraud, integrity, integrity violations

Research into the ethics and integrity of governance has expanded considerably in the last decades (De Graaf & Huberts, 2011; Lawton & Doig, 2006; Menzel, 2005). Within this research, the focus in international research is very often on corruption (Anechiarico, 2017; Bland, 2014; Bull & Newell, 2003; Graycar & Smith, 2011; Heidenheimer, Johnston, &

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LeVine, 1989; Heywood, 2015; Johnston, 2005; Klitgaard, 1988; Mungiu-Pippidi, 2016; Rose-Ackerman, 2006; Rothstein, 2011; Treisman, 2007), yet there is also broader research on ethics and integrity (Lewis & Gilman, 2012; Salminen, 2010; Svava, 2007), highlighting different types of integrity violations in public administration. This article concentrates on the latter: the integrity violation, distinct from corruption, that can harm trust in public governance and can affect the dignity and credibility of government. Earlier research has shown that these types of integrity violations are relevant in the public, the semipublic, and also the private sector (Bossaert & Demmke, 2005; Cooper, 2001; Cox, 2009; Dobel, 1999; Huberts, 2014; Menzel, 2012; USBO-Advies, 2008). But how often integrity violations occur in Western governance, and the precise nature of these violations, is as yet unknown. These questions are addressed in this article, which presents data on the subject that have been drawn from experience in the Netherlands. The main research question is: What is the scale of integrity violations within Dutch public governance and what is the nature of those violations?

The discussion that follows presents the results of research on the perceptions of 7,315 Dutch civil servants who were surveyed on integrity violations in their work surroundings (De Graaf, Lasthuizen, Bogers, Ter Schegget, & Strüwer, 2013). The initial focus is on the scale of violations, with a subsequent examination of their nature. Categorizing the reported integrity violations, specifying the categories they fall into, and analyzing them further, will generate an understanding of how the integrity violations are perceived by Dutch public administrators. The background to this research is set out below in the demarcation of several relevant concepts and in a discussion of what was already known about the scale and nature of Dutch integrity violations. In the last paragraph, some reflection is offered on the consequences for an understanding of the integrity and credibility of governance, primarily Western public governance.

## What Integrity is about and What is Known about Violations

### *Some Definitions*

In the context of governance, *integrity* has been variously defined as (a) being consistent and coherent in principles, values, and action (Montefiore, 1999), (b) following regime values and rules (Rohr, 1989), and (c) acting in accordance with relevant moral values, norms, and rules (Huberts et al., 2006). In all of these definitions, values are central. The definition of *public governance integrity* adopted in this article is based on the broader interpretation (c). It is the quality of governing in accordance with relevant moral values and norms (which include consistency, coherence, and lawfulness). *Values* are defined as qualities appreciated for, contributing to, or constituting what is good, right, beautiful, or worthy of praise and admiration (De Graaf, 2016). *Public values* are the important qualities of public governance (De Vries & Kim, 2011). *Norms* are regulations prescribing proper general and situational conduct. *Morals* (morality) are values and norms taken together (De Graaf & van der Wal, 2008).

A much-used typology of integrity violations has been created by (Huberts, Pijl, & Steen, 1999), discriminating between nine different categories: (a) corruption and bribery, (b) fraud, (c) theft and embezzlement, (d) conflict of (private or public) interest through gifts, (e) conflict of (private or public) interest through sideline activities, (f) abuse of authority (including abuse of the monopoly on violence), (g) misuse of information, inappropriate treatment of or behavior

toward others (discrimination, intimidation), (h) waste or abuse of resources, and (i) misconduct in private time. Moral judgments can be made unfairly; for example, when wrongdoing is exaggerated—what (Huberts, 2005) calls integritism or moralism. Caution is needed in evaluating such judgments.

### *What is Already Known*

Currently there is not much certainty about the nature and scale of integrity violations in Dutch public administration. This is partly explained by the issue of “dark numbers,” which greatly affects integrity research (Huberts, Lasthuizen, & Peeters, 2006). Dark numbers point to the fact that a significant number of integrity violations will never be brought to light; the cases of corruption and fraud that are exposed (and possibly prosecuted) are only the tip of the iceberg.

In 2005, the Vrije Universiteit Amsterdam reviewed the number of internal corruption investigations that had been held within organizations in the public sector (Huberts & Nelen, 2005). Ministries, provinces, courts, water boards, and several QUANGOs were surveyed. Questionnaires were sent to 341 organizations in the public sector, and 71% replied. The resulting estimate of the number of corruption investigations per year was 130, of which 43 were in ministries, 61 in municipalities, and 13 in the police, the remainder being spread over other organizations. Research on local government investigations of corruption and fraud (Huberts, Van den Heuvel, & Van der Wal, 2012) indicated that this number increased over the years 1992–2010, with, for 2010, a total of 301 investigations within local government (39% concerning corruption, 61% concerning fraud, 88% involving civil servants, and 12% involving politicians; about two thirds of the investigations that were initiated found that there had been fraud or corruption, in most cases the result of an internal procedure, and in one third of cases, the result of involving judicial authorities).

A later survey among town clerks focused on investigations of integrity violations (Huberts, Van den Heuvel, & Van der Wal, 2012). Among the conclusions: “It is still somewhat exceptional for Dutch municipalities to have a central integrity violation reporting system.” Only 49% of the clerks reported the existence of such a system. Of the 251 clerks who cooperated in the survey, 161 responded to questions about integrity violations. They reported investigation from 2008 or 2009. The results showed that the reporting of violations was not a generally accepted and established practice. The total number of investigations carried out, over varying time periods, was 829.

Investigations into corruption and fraud comprise almost a quarter of the total number (189 = 22.8%). However, overall, the biggest proportion of investigations examined inappropriate behavior, such as discrimination, sexual harassment, aggression, and violence. One municipality reported that out of a total of 310 investigations, no less than 219 were related to this specific type of violation. Fraud, theft, and abuse of resources accounted for more than 100 investigations in the sample, but it was found that internal investigation led only infrequently to criminal investigation; that is, in 75 of the 829 cases, less than 10%. In the case of corruption, the percentage was slightly higher, but, overall, only fraud, theft, and misconduct outside working hours gave rise to relatively higher enforcement of criminal sanctions.

De Graaf, Lasthuizen, and Van de Vijver (2009) also provide insight into the nature and scale of integrity violations in the Netherlands. In this research, citizens of Amsterdam were

asked whether they had noticed any violations on the part of employees of the Amsterdam municipality in the previous two years, and if so, what kind. Of the 2,854 respondents, 286 (10%) reported that they had seen a public servant do something that was not morally acceptable. After closer scrutiny of the respondents' descriptions of the incidents, 48% of the answers were considered not to be integrity violations as defined here. The answers were labeled according to the nine categories described earlier, and in total, 147 events were taken into account as perceived integrity violations. In effect, this means that 5.2% of the respondents reported that they had witnessed wrongdoing by public servants in Amsterdam in the preceding two years.

This research also provided insights into the nature of the integrity violations. Of the reported violations, 22.6% can be placed in the category of "unwanted treatment of, or behavior toward, others," and 12.7% fall within the category "waste and abuse of resources."

Overall, previous research presents a number of impressions which headline that corruption and fraud are all but irrelevant phenomena in the Netherlands given the number of internal investigations, but other types of violations appear to be much more prominent in (internal) investigations as well as in what citizens encounter as violations by public servants.

## New Research

### *Research Background*

The research presented here builds on previous research, but goes deeper to find out more about the nature and scale of integrity violations in Dutch public administration by asking public administrators themselves what kinds of integrity violations they observe in their direct working environment. Although this research also has its limitations—a topic that will be returned to—asking public servants directly is the most reliable way of finding out about the nature and scale of public integrity violations (Huberts et al., 2006). To go one level deeper to self-reporting would raise the issue of social desirability bias. Even when respondents are assured of full anonymity, they are not likely to report their own immoral behavior.

In 2012, the Dutch Ministry of the Interior and Kingdom Relations commissioned research into the functioning of the internal reporting system of the Dutch government. Permission was granted to survey a large Internet panel, the so-called *Flitspanel*, set up by the Ministry of the Interior and Kingdom Relations. The *Flitspanel* is surveyed periodically on a divergent range of topics, and is made up of people working throughout the Dutch public sector. In September 2012, a questionnaire on the functioning of the internal reporting system was distributed to all the members of the *Flitspanel* (about 38,000 civil servants), of whom 7,315 responded.<sup>1</sup> For the purposes of this article, responses to only one of the survey's questions are considered: the question about respondents' personal experience of integrity violations. The question asked whether the respondents had had suspicion(s) of integrity violations taking place in their direct working environment in the previous two years, and, if so, what the nature of the violation was. The question was layered; respondents who filled out "yes" were subsequently asked to categorize the violations using a closed multiple-choice question, and then were asked in an open question to describe the violation they suspected had taken place.

TABLE 1  
Respondents per Sector

<i>Sector</i>	<i>Frequency</i>
National ministries	282
Municipalities and provinces	381
Judiciary	27
Regional water authorities	49
Primary and secondary education	315
Intermediate, higher vocational education	412
Higher education	117
Research institutes	22
Academic medical centers	100
Police	231
National defense—civilians, military	76
Regional corporations	23
<b>Total</b>	<b>2,035</b>

### *The Scale of Integrity Violations*

Of the total of 7,315 respondents who filled out the survey, 2,035 respondents reported suspicion(s) of integrity violations in their direct working environment in the preceding two years (nearly 28%). This group of respondents showed considerable variation in terms of the sectors they were working in; there was a slight over-representation in the education sector (see Table 1).

### *The Nature of the Integrity Violations*

The respondents who had experienced a violation were asked to categorize the event they had witnessed (Table 2); they could choose among different given categories or they could give their own description of the type of violation they had encountered by choosing the option “If other, please specify” and subsequently choosing their own description. The question was

TABLE 2  
Self-Reported Categorization of Integrity Violation (n = 2,035)

<i>Category</i>	<i>Frequency</i>
Corruption/bribery	96
Fraud, theft	369
Conflict of (private or public) interest through gifts	257
Conflict of (private or public) interest through sideline activities	387
Misuse and manipulation of information	274
Abuse of authority	700
Inappropriate behavior, discrimination/intimidation	867
Waste and abuse of resources	794
Private-time misconduct	134
If other, please specify	336
<b>Total</b>	<b>4214</b>

a multi-response variable (i.e., respondents were allowed to give more than one response), and therefore the decision was made to display frequencies in Table 2. If a respondent had a multiple response, this indicates that the respondent either had encountered multiple violations or had placed a single violation under multiple categories. The total number of violations, therefore, does not correspond to the total number of respondents who filled out the question.

After choosing a category, respondents were asked if they could describe the violation:

Could you give a short description of the integrity violation you encountered or had the suspicion of taking place? If there is more than one violation, please choose the one that is, in your eyes, the most serious. We are not interested in names of people involved but more in what exactly happened, how it could have happened, and what the possible consequences were. We will use the information in order to establish the relationship between the type of violation and the reporting system.

The answers to this question form the basis for the analysis presented here. The answers were analyzed in multiple steps using Microsoft Excel. In the first step, the categorization of violations was rearranged on the basis of the respondents' descriptions and according to the authors' definitions. It is known from earlier research (De Graaf, 2010) that this is a useful step in the process, since interpretations of "integrity" can vary greatly. The definition of appropriate moral norms and values will always be subject to debate, not least because norms and values are ever-changing (cf. Hoenderboom, 2013). As a result of this step in the analysis, some events were labeled as "not an integrity violation, according to our definition." For analysis, a single researcher coded the answers according to the definitions of the nine categories. Since this process is always subjective, all the outcomes were checked by a second researcher. Where opinion differed, the case was discussed between the two researchers until consensus was reached. In order to provide maximum transparency about the decisions made during the analysis of responses, an extensive list of answers is given (see "Nature of integrity violations"). The data analysis process can be characterized as an inductive and iterative process where all decisions made were aimed at improving the credibility of the interpretations. *Credibility* refers to the fit between the data representation by the researchers and the views of the participant (Lincoln & Guba, 1985). Techniques to assure the credibility of the interpretations included peer debriefing, independent analysis by multiple researchers, and literature research. Both the reassignment of answers to categories and the development of subcategories happened in close collaboration between the two main researchers and some fellow researchers at stages. The definitions of integrity violations and the nine categories were leading. All answers were read at least three times. Reading activities encompassed understanding of the meaning of respondents' answers, comparison with other answers or groups of answers, and comparison with the literature. Answers of respondents that did not fit into one (sub) category were reassessed by the second researcher and later discussed between the two main researchers until agreement was reached. These discussions resulted in decisions to either (a) place an answer into a different category, (b) assign a new (sub)category, or (c) label it as a nonviolation. For example, a subgroup of answers that was not used displayed the general discontent of respondents with their working environment, which seemed to rely on personal feelings of "things not being right" without there necessarily being a violation of the appropriate norms or values.

Of the answers given, 207 were excluded as not describing an integrity violation. In this category, answers were often in line with what (Huberts, 2005) calls integritism, or they were

expressions of general disgruntlement that did not necessarily classify as an integrity violation. The following is an example of an answer that was coded as not being an integrity violation:

Presenting an incorrect image of effort and performance of an employee in order to use her for one year as board secretary in addition to her actual function as administrative clerk at the R&B department. The board asked her if she wanted to work for them full time. She said yes to this. However, she was told by the board in a subsequent phone call that an external candidate had got the job. She was, and remains, for salary purposes on scale 6. She was treated by the board as a piece of junk.

In addition to the answers that were not labeled as integrity violations, a substantial number of answers (223) were not usable. Most of these answers had not been completed or had comments such as “don’t feel like it.” A few respondents (19) replied that they did not want to answer a question because they were afraid that their answer would reveal their own or a victim’s identity.

The total number of respondents replying to the question, minus the number of answers that could not be used and the number of answers that were not labeled as integrity violations, brings the total number of respondents who gave a usable answer to 1,612. Of these, 436 gave a multiple-response answer.

In order to determine the nature of integrity violations, the 1,612 usable answers were analyzed in a second phase of the analysis. This included study of the descriptions within each of the nine categories and clustered similar ones. Out of this analysis, subcategories emerged in this explorative research.

### Scale of the Integrity Violations

The division of violations across categories is displayed in Table 3.

When Table 3 is compared with Table 2—which displays the division of violations across categories according to the labels the respondents chose—there are clear differences. This is partly explained by the inclusion of multiple responses, and the combined percentages therefore exceed 100%. The order of categories in terms of most-to-least number of violations does show some resemblance to the self-chosen labels: inappropriate treatment of others is reported most often, followed by abuse of authority, and waste and abuse of resources.

TABLE 3  
Perceived Violations per Category, Newly Classified

<i>Type of violation</i>	<i>Frequency</i>	<i>Percentage</i>
Conflict of (private or public) interest through gifts	13	1.0%
Private-time misconduct	31	1.0%
Conflict of (private or public) interest through sideline activities	128	6.0%
Misuse of information	137	6.0%
Corruption/bribery	147	7.0%
Fraud, theft, or embezzlement	176	8.0%
Waste or abuse of resources	427	20.0%
Abuse of authority	527	24.0%
Inappropriate behavior	568	26.0%
<b>Total</b>	<b>2154</b>	<b>99.0%</b>



Looking at the summary of the data in Table 3, it is possible to start formulating an answer to the main research question about the scale of integrity violations in public administration in the Netherlands. A first impression of the scale was obtained by dividing the responses into nine categories. It is worth noting that the responses relate to (suspicions of) perceived integrity violations within a sample size of 7,315 respondents; this means that more than 70% of the respondents said that they had not encountered any violation of integrity. Making a general statement that there are few or many violations taking place is not possible (De Graaf, Huberts, & Nelen, 2008). That judgment is a matter of individual perspective. However, it can be said that the data provide strong evidence that there are some problems within Dutch public institutions in terms of ethics and integrity. If the results from the survey correspond with reality, then between 2010 and 2012, 2% of Dutch public servants witnessed corruption and 8% encountered unethical/inappropriate behavior (integrity violations). That is a considerable part of the Dutch public workforce.

It should be stressed that this research concerns perceptions. It cannot be confirmed that the events reported did indeed take place—even insofar as a shared normative framework exists to label what is an integrity violation and what is not. However, it can still be concluded that almost a quarter of Dutch public servants (22%) suspected that they were witnessing an event that could be classified as an integrity violation. Based on earlier research—discussed in a previous section—this number might have been expected to be lower.

## NATURE OF THE VIOLATIONS

The results of the question asking respondents to describe the violations with which they were confronted can be elaborated upon. In the interests of transparency about the analytical decisions made, each paragraph begins with an explanation of the definition used for the particular type of violation. These definitions closely follow Van den Heuvel et al. (2002). During the analysis, it emerged that some answers within certain categories showed sufficient resemblances between them as to warrant the creation of additional subcategories. The categories were not employed in earlier research and are therefore explorative in nature. The most important elements in this section, however, are the respondents' answers; they give a detailed account of the *nature* of the integrity violations. The respondents' answers as presented below have been kept close to the original by making as few adjustments as possible. In addition, the translation from Dutch to English (all answers were originally given in Dutch) slightly compromised the intention of presenting the responses as literally as possible. In some cases, the names or titles of people and departments were replaced or removed to assure anonymity. The selection of answers for this article was based on how well they represent the category to which they belong. More answers are presented in those categories where answers showed considerable variance than in the categories where answers showed significant resemblance. Table 4 shows the number of violations per category including the subcategories.

### Conflict of (Private or Public) Interest through Gifts (13)

One can speak of “conflict of (private or public) interest through gifts” in cases where public servants receive gifts, services, resources, benefits, or promises that are more in their own

TABLE 4  
Integrity Violations per Category, Including Subcategories

<i>Type of violation</i>	<i>Frequency</i>
Conflict of (private or public) interest through gifts	13
Private-time misconduct	31
Conflict of (private or public) interest through sideline activities	128
Misuse of information	137
Corruption/bribery	147
Cronyism	133
Breaking procurement rules (overlap with abuse of authority)	22
Rest	5
Bribery	14
Fraud, theft, or embezzlement	176
General wrongful profiting	77
Theft	68
Wrongful declarations	31
Waste or abuse of resources	427
Working hours	129
Wrong hours	89
Private matters	40
Marginalized	45
Not carrying responsibility for (accidents in) the workplace	19
Not representative	15
Alcohol	28
Rest	191
Abuse of authority	527
Education	50
Breaking laws, rules, or regulations	100
Breaking procurement rules (overlap with corruption)	22
Criticism	61
Individual authorities	165
Rest	151
Inappropriate behavior	568
Intimidation	148
Threatening	41
Rest	379
<b>Total</b>	2,154

interest than in the interest of the organization or the public (Lasthuizen, 2008). Examples given include: “Manager who without any sense of shame accepts very expensive gifts” and “Invitations for dinner/soccer matches under the guise of networking.”

### Misconduct in Private Time (31)

Committing a criminal offence outside of the execution of the official job and unrelated to it is sometimes referred to as “leisure time crime” (Van den Heuvel et al., 2002). However, even if an event or behavior is not punishable, it can still cause official harm or damage the prestige of a particular role. Examples include “Getting into the car after alcohol consumption in one’s private time” and “A trainee has contact with a multiple-offender/drug dealer.”

### Conflict of (Private or Public) Interest through Sideline Activities (128)

When public servants have interests that conflict with public or organizational interests because they have additional jobs or tasks that are not compatible with their public role, it may be described as conflict of (private or public) interest through sideline activities (128). This is often simply referred to as conflict of interest. In this category, there were descriptions of conflicts of interest that existed both outside and within the organization, meaning that violations of this kind do not necessarily have to take place externally. Several respondents said that they thought it unacceptable for colleagues to have affairs or love relationships.

Answers within this category include: “Combining internal functions with external interests” and “Relationships/affairs between managers and employees.”

### Misuse of Information (137)

Abuse or manipulation of information pertains to instances where information is used for personal or organizational interests that contradict the purpose served by the information, or when the information is used at the expense of the general or public interest (Van den Heuvel et al., 2002). Examples of abuse of information include lying and deceiving (purposely spreading wrongful information) and disclosing (revealing confidential information). Another particular type of abuse of information that was encountered many times in the dataset is the abuse or questionable use of confidential information internally without necessarily disclosing the information externally. Examples of this are: “Looking up information about celebrities,” “Irresponsible use of confidential information on patients,” and “The use of psychological tests to filter (out) employees.”

### Corruption/Bribery (147)

Corruption is seen as abuse of power that involves bribery and yields personal benefits. A public servant who is corrupt operates in the interest of an external or third party in order to obtain certain promised benefits or to reciprocate certain benefits received. Those benefits might have been offered by the third party or requested by the public servant. Additionally, benefits need not only be monetary, but can also be indirect personal favors or gains; for example, for one’s political party, family, or friends. Corruption in the form of cronyism involves behavior that yields benefits for family, friends, or acquaintances.

Within the sample, 147 cases of corruption were discerned, the majority of which (133) can be classified as cronyism. Relative to the dataset, the total number of corruption cases is quite substantial and can be described as what Van den Heuvel (1998) refers to as “corruption in the polder” (meaning typical Dutch corruption). Answers that were given in this category relate to jobs and assignments that were granted to acquaintances and friends. Examples of answers are: “Appointing people who are acquaintances of the policymakers” and “A colleague was deliberately assessed negatively in order to open the way for the appointment of the (unemployed) partner of another colleague.”

When respondents describe cases where certain commissioned work was granted to acquaintances, they often mention that the “perpetrators” did not comply with (EU) governmental procurement regulations. This was also mentioned a few times within the category of abuse

of authority. Combining both categories, there are, in total, 22 cases where respondents reported a violation that related to compliance with procurement regulations. An example is: “Favoring a partner of an executive by granting them an assignment outside of the procurement and acquisition rules.”

The last subcategory of answers created within the overall category was that of corruption in the form of bribery with money or goods (14). “A high-level manager went on a trip to the USA under the guise of customer research at the invitation of, and paid by, a supplier. Reported it to the board and a confidential counsellor, nothing was done with it. Subsequently, millions were spent in trade with this supplier”; “Junkets that could be linked to sizeable commissions.”

### Fraud, Theft, or Embezzlement (176)

In the sample, 176 (parts) of answers were labeled as fraud. The definition applied was as follows: deriving benefits from the organization for personal gain without the involvement of a third party. The definition covers theft and embezzlement, but also the abuse of organizational resources by making questionable declarations and taking advantage of resources, such as a company car or other benefits that are available to the public servant.

For some answers, it proved difficult to determine which category they should be committed to: fraud or the abuse of authority. For example, one respondent mentions “adjusting data” as a violation witnessed; changing data could be in favor of someone’s own interests but is probably also abuse of authority. In most cases where it was unclear which label to choose, the incident was labeled as abuse of authority if there was no clear sign of personal gain. These kinds of violations refer to situations where people deviate from the applicable rules or regulations to “get a job done.”

Within the main category, 31 cases of “false declarations” were discerned: by making wrongful declarations, people obtained for themselves financial resources that belonged to the organization. These cases were considered to be theft of organizational resources and were therefore placed within this main category. Wrongful declarations could also have been labeled as waste or abuse of resources. However, Van den Heuvel et al. (2002) emphasize that in the case of waste or abuse of resources people seem to be negligent or thoughtless, while in the case of wrongfully declaring goods or events people tend to consciously misrepresent the situation. Examples of false declarations that were given include: “Declaring miles that weren’t spent travelling,” “Declaring lunch when groceries were bought for that lunch,” and “Creating a report of an assessment of a company when they were never there.”

Under the “declarations” subcategory it was possible to clearly discern a number of theft and embezzlement cases (68), such as “Theft of property like bundles of printing paper and packages of coffee.”

The remaining answers in this category (77) were labeled as general exploitation of the organization. Abuse of the company car was often mentioned: “Deviation from company car rules for private rides.”

### Waste or Abuse of Resources (427)

Van den Heuvel et al. (2002) define waste and abuse of resources as negligent, thoughtless, and indifferent use of government property, time, and finances. It is to deliberately function

inefficiently or ineffectively. The total number of violations falling into this category was divided into subcategories.

Quite a few respondents (129) mentioned that they had seen colleagues or employees in their environment misusing working hours. Some respondents called this fraud but this label was not applied. Waste of working hours mainly happens because violators register their hours wrongly or do not register them at all. Additionally, public servants misuse working hours by dealing with private matters during working hours. This kind of behavior sometimes even extends to working for one's own company during hours that should be spent working for the government. An example of misusing working hours (89): "Declaring overtime during which people (partly) did not work." Examples of taking care of private matters during working hours (40): "Doing chores for their own company during working hours: making calls, tweeting, LinkedIn, emailing, writing reports."

The remainder of the answers can all be labeled as abuse of resources. As mentioned, deliberately functioning inefficiently or ineffectively at work so as not to deliver what might be reasonably expected is an abuse of resources (Van den Heuvel et al., 2002). What exactly a reasonable expectation might be, and whether a violator did or did not perform efficiently or effectively, is difficult to determine for all responses. During the first round of analysis in which all the answers were read, answers were consigned to this category even if there was some doubt that they belonged there. After the initial phase of the analysis, this category was therefore a "rest category." The answers initially placed within this category were analyzed a second time to determine whether they could properly be labeled as abuse of resources in accordance with the definition of Van den Heuvel et al. (2002). Additionally, each answer was considered as to whether it was the integrity of the organization or the government that was impaired or the personal integrity of the individual. If the latter, the event was not marked as a governmental integrity violation.

Despite the variety of responses within the abuse of resources category, it was still possible to place a number of responses in subcategories. The first one was "being marginalized" (45). Marginalizing was often mentioned by respondents to mean that people deliberately tried to sideline others, and that violators purposely tried to reduce the influence of certain employees or groups without reason. Sometimes this kind of behavior goes hand in hand with bullying, and it was mentioned a number of times that marginalizing started during or after sick leave. "Subsequently, the managers and HRM together wrote a fake assessment to create evidence with the intention of ditching me. Between the lines I was declared *persona non grata*, bullied, etc."

Two other subcategories were created: "not carrying responsibility for (hurt in) the workplace" (19 times) and "unrepresentative behavior" (15). The first category groups responses describing a failure to take workplace injury seriously. For example: "A number of colleagues had a burn-out. Not enough was done to support these people. As a result they couldn't return to the workplace." The second category related to situations in which behavior—either in public or within the organization—was unrepresentative of a person's function, occasionally harming the public image of the organization: "Criticizing our organization on Facebook or other social media, in such a way that it is recognizable for which organization you are working."

A striking subcategory was created for the answers of those respondents who had encountered violations involving alcohol (28). Alcohol consumption, both during and outside working hours, was mentioned and in all cases affected the job. Sometimes it was not clear

whether the alcohol consumption took place during working hours or not, and, as in other categories, in this subcategory, while some respondents said there were clear indications that a violation was taking place, others only suspected it. “Repeated alcohol consumption during working hours. It’s tolerated by the board and no action is taken.”

Slightly less than half of the answers could not be assigned to a subcategory (191). The variety in these answers ranges from “poor reporting of observations” to “pitting students and teachers against each other,” and from “departments that are too bureaucratic and hinder performance” to “a colleague has anorexia and does not function properly.” A few answers were less frequent (<10) and described incidents where employees were caught looking at pornographic websites or were strongly suspected of doing so.

### Abuse of Authority (527)

Lasthuizen (2008) defines abuse of authority as actions or behavior that deviate from the norm to serve the interest of the organization. It relates to noncompliance with, or deviation from, appropriate rules or regulations that are enforced in an organization or apply to employees. Examples of the abuse are ignoring or abusing policy, adopting procedures to “get the job done,” to get certain results, or to improve effectiveness. Van den Heuvel et al. (2002) emphasize that the axiom “the end justifies the means” applies within this category. But the end, however praiseworthy it might be (e.g., catching criminals), cannot justify the use of unlawful, immoral means.

In addition to behavior that deviates from organizational rules, this category also includes incidents in which people abuse individual authority. Examples are the abuse of higher positions in the hierarchy of an organization or the abuse of status to repress subordinates. Occasionally it proved difficult to decide between applying the label of fraud or of abuse of authority. Behavior in which there was no clear personal gain was eventually designated abuse of authority.

A substantial number of violations within this category took place in educational institutions (50). Examples range from adjusting grades to giving out diplomas unfairly. Incidents described included: “Having students pass who perform well below par ‘because they got this far’ or ‘because otherwise we would have to put up with them even longer.’ ”

Another subcategory that was created revolved around disregarding laws, regulations, and procedures (100). As noted earlier in the paragraph on corruption, several answers in this category relate to violations of procurement regulations (22). Additionally, several respondents mentioned that rules and procedures for job interviews and appointments were disregarded.

Violations that involved people criticizing either colleagues or the organization were reported multiple times (61) and were therefore assigned to a separate subcategory. Respondents often said that it was not acceptable in their organization to “air one’s dirty linen in public.” Respondents who nevertheless criticized or discussed sensitive affairs often experienced retaliation, such as unfair treatment or a negative assessment. Some experienced attempts to remove them from the organization. Given what is already known about whistleblowers (De Graaf, 2010; Miceli, Near, & Dworkin, 2008), this does not come as a surprise. Some of the respondents’ answers do not identify actual behavior in which authority is abused but more generally describe a culture in which people feel unsafe or unsupported when expressing criticism: “A whistleblower was severely intimidated and in the end she lost her job.”

A final subcategory was created for violations that related to disregard of the norms of the specific authority (165). In these cases, “perpetrators” often abused their position, either to make colleagues or subordinates do what they wanted them to or to ensure that certain decisions were made or processes followed that contradicted policy or advice. Within this subcategory, cases of abuse of power were frequently noted. Additionally, in many cases, abuse of individual responsibilities and rights often went hand in hand with intimidation, and cases therefore overlap with the main category of “unwanted treatment of, or behavior towards, others.” Within this subcategory, there was significant variety in responses, one example: “The director overruled a decision because he himself lives in that area.”

Finally, a number of answers cannot be gathered into a subcategory of the main category (151). It is significant that in many of these answers respondents mention rules being either adjusted or side-stepped if it is convenient for the violator. Additionally, some respondents point out that certain matters are adjusted to artificially improve results or portray things as better than they are: “Holding salary to realize signing of false documents”; “Charging costs that are made by the municipality to a project developer.”

### Inappropriate Behavior (568)

Inappropriate and ill-mannered behavior can result in discrimination, intimidation, or bullying of colleagues, clients, or the public (Van den Heuvel et al., 2002). The central idea in interactions between public servants and colleagues and their clients is that behavior or treatment needs to be in line with appropriate norms and values. In the sample for this research, the number of answers categorized as “inappropriate treatment of or behavior towards others” is higher than any other response.

Within the main category for these responses, two subcategories were created to accommodate the answers of respondents describing similar violations: intimidation (148) and threats (41). In a number of cases falling into the latter subcategory, managers had abused their positions by threatening subordinates—for example, by threatening to fire them. Examples given were: “Culture of fear with severe intimidation” and “Threatening to make notes in staff files, while such a thing does not even exist at HRM.”

The remainder of the answers (379) varied too much to create further subcategories and were therefore labeled as “other.” Answers ranged from bullying to discrimination, from misogynistic behavior to aggression, and so on. For example: “No one is willing to risk doing something if they are afraid.”

Because the majority of responses within this main category were not assigned to a subcategory, some examples are given: “Treatment of subordinates by higher-ranked people: discrimination, bullying, indifference, no evaluations, or poorly executed evaluations”; “Collectively ignoring a colleague”; “Discrimination on the basis of someone’s sexual orientation.” And additionally: “Posting offensive messages on Facebook.”

## SUMMARY, CONCLUSION, AND DISCUSSION

What stands out from this analysis is that a substantial proportion of respondents say that they have experienced inappropriate and ill-mannered behavior and relatively “small” violations,



such as profiting at the expense of the organization (fraud, abuse of resources) through non-compliance with working-hour regulations or by abuse of the organization's resources. When one thinks about integrity violations in public governance, the first thing that often comes to mind is fraud or corruption; the sample demonstrates that integrity violation is wider than that and other areas merit attention. Fraud and corruption together amount to 15% of the violations described in the sample. In the research among council clerks by (Huberts et al., 2012), 23% of the internal investigations were seen to be about corruption or fraud. In the research on which this article is based, it was demonstrated that the majority of investigations were into different types of violations, mainly inappropriate behavior, followed by fraud, abuse of resources, and transgressing rules.

As a result of the research described in this article, more is known about the dimensions of integrity violation within government. More accurately, more is known about the frequency of perceptions of each type of violation. However, labeling the frequency of such violations as "significant" or "insignificant" is a question of one's own perspective. As earlier research has suggested (De Graaf et al., 2008), it seems just as reasonable to describe the situation as "a glass half full" as "a glass half empty." Nevertheless, it cannot be denied that there is wrongdoing in Dutch governance and that there is reason enough to exercise caution and to have proper integrity policies in place, with good internal reporting systems (De Graaf, 2010).

Looking at the nature of the violations, it is evident that the biggest category of violations is inappropriate treatment and ill-mannered behavior (568). The two subcategories of intimidation (148) and threats (41) stand out within the main category, with a substantial number of respondents referring to misogynistic behavior and bullying.

The second-biggest category of integrity violations was that of abuse of authority (527); here, too, it could be said that this relates to behavior toward others. Cases were assigned to this category that described deviations from the norm that were in the interest of the organization and featured abuse of individual authority, such as abuse of power. The biggest subcategory within this heading related to the violation of the norms of the specific authority (165). Often the abuse of individual authority seemed to go hand in hand with intimidation. Another type of violation that had frequent mention within the category was wrongful or unjust treatment of people who express criticism, people who report violations, or whistleblowers (61). The biggest subcategory within the overarching abuse-of-power category is noncompliance with laws, regulations, and procedures (100). This category contains answers in which respondents clearly stated that certain rules or procedures were not being followed, with procurement regulations specifically mentioned several times.

The third-biggest category is waste and abuse of resources (427). Waste is negligent, thoughtless, and indifferent use of government property, time, and finances. Waste of company time, by not observing working hours or by doing non-work-related things during working hours, is the biggest subcategory (129). In addition to this, relevant subcategories were: marginalizing people or trying to make them less influential (45), alcohol abuse during working hours (28), not carrying responsibility for (accidents in) the workplace (19), behavior unrepresentative of function (15), and visiting pornographic websites during working hours (<10). It is interesting to note that so many respondents see "simple" violations, such as not respecting working hours, as a violation.

Of the 147 corruption responses, a vast majority were ascribed to the cronyism subcategory. There were frequent allegations that jobs or commissions were being unfairly given to friends, acquaintances, and family. Corruption involving bribery was mentioned only 14 times. In the



category of abuse of authority, there emerged a similar pattern of violations committed because they would help friends or family. It can be said that when the discussion is about corruption in the Netherlands, what is generally being spoken about is the privileging of friends and family (De Graaf & Huberts, 2008).

Within the main category of fraud there were many instances of the organization being exploited (77). Respondents, for example, reported cases where laptops, company cars, and regulations were abused, or where social events were organized without proper reason. Theft and embezzlement were mentioned 68 times, and consciously making a wrong declaration resulting in benefits for the violator was mentioned 31 times.

The cases ascribed to the category of conflict of interest contained responses that were relatively unambiguous, and the same is true for answers that were labeled as abuse of information. Violations under these headers always related to the abuse or manipulation of (confidential) information to serve interests that should not be served with the information.

Finally, two minor categories were created: misconduct outside working hours (31) and receiving gifts (13). These types of violation involved, respectively, harmful or criminal behavior outside of the official function, and accepting gifts, services, resources, advantages, or promises that were more in one's own interest than in the interest of the organization. Misconduct outside working hours ranged from traffic violations, through dealing drugs and hiring prostitutes, to driving under the influence.

A number of conclusions seem relevant in response to the basic questions. What are the consequences for public understanding of the integrity and credibility of Western governance?

The first conclusion is that the integrity of governance in a Western context concerns corruption (and fraud), but there are indeed many other types of integrity violations that are prominent in the eyes of public sector employees. The moral quality of governance is thus also related to other values and norms than incorruptibility and impartiality. When the integrity of governance is reflected upon, taking into account that integrity is among the bases of the legitimacy and credibility of (public) power—and the importance of “procedural justice” for that (Van Ryzin, 2011)—there are consequences for research in this field, as well as for policy and societal debates on (public) governance. That conclusion offers something for scholars and practitioners to reflect on.

The present mostly descriptive article on findings in one country offers food for thought for the fierce and interesting debate between scholars on (public) corruption and integrity (Hardi, Heywood, & Torsello, 2015). Some scholars prefer to treat corruption as the central concept, though they interpret it in many different ways. For example, corruption as contradiction to ethical universalism (everyone treated equally and fairly), including taking into account the outcome of governance, such as terms of social justice (Alina Mungiu-Pippidi, 2016); or (systemic) corruption, including the exclusion from decision-making of those most affected (Anechiarico, 2017); or, with Graycar (2015), putting more focus on the behavior of governance actors, including violations as misuse of information and abuse of discretion, or the more traditional interpretations in terms of private gain from public power.

In addition, it is relevant that the integrity violations that are often missing, as, for example, discrimination and intimidation, are seldom also considered irrelevant for the trust of citizens in the government and governance system (de Lancer Julnes & Villoria, 2014; Salminen, 2010). Whatever the semantics, the research presented aims to contribute to the debate, with a focus on what public servants actually interpret and experience as integrity violations.

Additionally, it seems relevant to differentiate types of violations. What causes integrity violations, including corruption? What seems to help to prevent and curb them? More research is needed, for example, on how the leadership strategies that help might be different for different types of violations (Heres, 2014; Lasthuizen, 2008). By definition, this also creates dilemmas, and requires reflection on the strategies and policies that in practice might work to protect integrity and prevent violations. To progress, more comparative international research on both integrity (violations) beyond corruption, and on the involvement of politics, public administration, civil society, and citizens in addressing and interpreting integrity, is both challenging, and needed.

## NOTE

1. The complete report in Dutch can be downloaded from the website of the Dutch National Integrity Office: [http://www.integriteitoverheid.nl/fileadmin/BIOS/data/Publicaties/VU\\_onderzoek/Rapport\\_Interne\\_meldsystemen\\_bij\\_de\\_overheid\\_Definitief.pdf](http://www.integriteitoverheid.nl/fileadmin/BIOS/data/Publicaties/VU_onderzoek/Rapport_Interne_meldsystemen_bij_de_overheid_Definitief.pdf).

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