

Guidelines for Integrity Projects

Guide to a preventive self-examination of vulnerabilities within the public sector

Introduction

In 1996 the then National Security Service (BVD) brought out the paper 'Integrity Projects', a guide that helps government organisations to enhance the integrity of their performance. This guide has since been used within various sections of public administration. Partly on the basis of these experiences, a revised and updated version, entitled '*Guidelines for Integrity Projects; a guide to a preventive self-examination of vulnerabilities within the public sector*' was published recently.

Integrity affairs

Recently a number of integrity incidents within various sections of the government machinery caught the public eye. In addition to fraud in the building, education and health sectors, cases such as the 'Geldergate' and 'Ceteco' affairs (involving misappropriation of funds by provincial authorities) adversely affected the citizens' image of the quality of provincial administration. With respect to the municipal government, for example, the recent integrity incident within the municipality of Delfzijl can be mentioned. These affairs damage the image of the public service and underline the necessity of continuous pro-active and preventive investment in integrity.

Integrity principles

The Guidelines emphasise the importance of an active and professional integrity policy, because the damage caused by an integrity violation is accumulative and has a multiplier effect. This is caused by the following integrity principles:

- an integrity violation within *one government organisation* will soon reflect upon other organisations in the public sector, as a consequence of which the citizens may lose confidence in the civil service as a whole;
- '*minor*' integrity violations usually lead to more serious ones, at least when not duly checked (the principle of the sliding scale);
- dishonest or corruptible behaviour by *one or two* employees – if not checked by corrective measures – triggers similar behaviour by others (the principle of infection).

Importance and responsibility

The responsibility for integrity rests primarily with each government organisation itself. In addition, the Minister of the Interior and Kingdom Relations acts as the co-ordinator for the integrity of public administration. He is responsible for the sound and proper functioning of public administration and is therefore involved in the development, integration and stimulation of an integrity policy within the various government institutions. The General Intelligence and Security Service (AIVD) is one of the branches of the Ministry of the Interior and Kingdom Relations. As part of its statutory duties, the AIVD displays a number of activities in the field of integrity, including the development and provision of the Guidelines for Integrity Projects.

Incidents versus system faults

The integrity project as described in the Guidelines has a preventive character. It is not focused on the detection of corruptible persons and on the investigation of specific integrity incidents, but on identifying the integrity-related vulnerabilities within an organisation and on reinforcing the resistance capability of that organisation. The project is mainly focused on possible improvements in the organisational structure and in particular on rules, procedures and systems. System faults may lead to regular (large-scale and frequent) integrity violations:

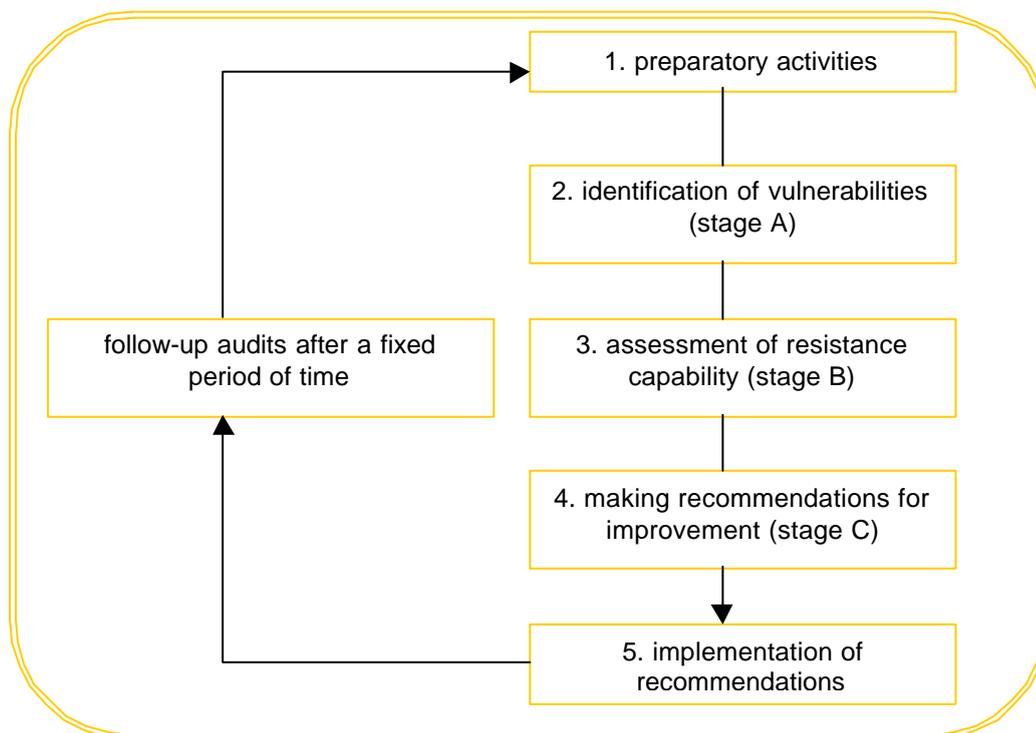
‘ There will always be some ‘bad eggs’ in the public service, as there are anywhere else in society. But perhaps more worrying than ‘bad people’ are ‘bad systems’.

As mentioned before, it is the management of an organisation that is primarily responsible for the integrity policy within that organisation. The project described in the Guidelines is a self-examination; it enables an organisation to identify its own vulnerabilities and to develop measures to protect these. The implementation is facilitated by the practical instruments, examples and background information given in the Guidelines. This approach is based upon the idea that the greater the involvement of an organisation in the actual implementation of the project,

- the more responsible the organisation will feel for it;
- the greater the chance that integrity awareness within the organisation will really sink in;
- the broader-based the support for the conclusions and recommendations will be;
- the greater the chance that these will actually be implemented.

Stages of the project

The project consists of three stages. During stage A of the project, managers make an inventory of the *vulnerabilities* within their own section of the organisation, distinguishing vulnerable activities (VA) and organisational vulnerabilities (OV). A VA is, for example, handling confidential information as part of the duties of a specific position, while OV involve organisation-wide vulnerabilities, like the quality of recruitment and selection procedures. During stage B, a project group makes an assessment of the existing *resistance capability*, i.e. the whole range of (formal) rules, procedures, regulations, instructions, policy and other structure-related measures that contribute to the proper functioning of the organisation and to the integrity of its performance. During stage C, recommendations are made to mend 'holes' in the resistance capability, if any. After all, vulnerabilities that are insufficiently 'covered' by procedures and measures, or not at all, constitute specific integrity risks. In addition to making recommendations directly resulting from the project, it is also important to ensure permanent awareness of the subject of integrity within the organisation and regularly to carry out follow-up audits. These should fit in with the method developed by the Ministry of Finance, described in its paper called 'Integrity within the Public Service; a guide to an audit'. The following diagram represents the structure of the project:



Avoiding a discrepancy between policy and implementation

It is important to have an integrity policy, but it is equally important that employees actually know *and* apply the rules and procedures based on that policy. One of the main conclusions of the Parliamentary Committee of Inquiry for the Building Industry is that usually integrity

policy is a proverbial 'paper tiger' and that there is a discrepancy between the official policy and its implementation in practice. A questionnaire annexed to the Guidelines enables organisations to gain insight into the extent to which their employees observe these rules. In practice this often appears to be insufficient.

Guarantees, risks and mitigating circumstances

The application of the Guidelines for Integrity Projects is no absolute guarantee of an organisation's integrity. It reduces the risk of integrity violations, however. It may also play a role in the judgement of integrity incidents by outsiders. After all, outsiders will judge a violation differently when the management of the organisation has actually tried to reduce the risk of such violations.