WHISTLEBLOWERS AUTHORITY

INTEGRITY IN PRACTICE

Towards an ethical culture

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Whistleblowers Authority

The Whistleblowers Authority is for people wishing to report work-related misconduct within the public sector or business community. If necessary, we provide advice and conduct investigations. We also help employers prevent misconduct and promote integrity within their organisation.

Working on culture

Good organisations have an open and ethical culture. The benefits of an open culture are clear. More quality and job satisfaction, less absence due to illness, fewer chances of wrongdoing and more trust among colleagues, customers, citizens and stakeholders. For that reason, more and more sectoral codes and regulators are encouraging employers to invest in a good culture. So how can you do this in a smart and effective way? And what exactly is 'culture'? You will find the answers to these questions in this brochure.

A practical guide

This brochure is a publication by the Whistleblowers Authority and is a guide to working on an ethical culture in your organisation. To help you in this, you can use the Integrity Infrastructure. This is a practical and scientifically proven model for developing integrity. In this brochure, we adapt the model specifically to culture, helping you to cohesively preserve and reinforce the culture in your organisation.

Who is this brochure intended for?

This brochure is intended for anyone involved in promoting integrity and culture in their organisation, either publically or privately. Whether you are an integrity professional, compliance or ethics officer, manager, counsellor, HRM employee or working specifically on culture, this brochure will come in very useful. Not every organisation can invest in culture on their own. So we recommend that employer organisations, branch associations, umbrella and professional organisations support their members in this. This is another way in which this brochure can be useful.

1 The importance of culture

More and more organisations are realising that a good culture at work is essential for their welfare. A good organisational culture is open and ethical. Everyone benefits when an organisation has a good culture. Employees are more productive and work with more enjoyment. They are less stressed, absenteeism is lower, the chance of wrongdoings is less and there is more trust in each other and in third parties, such as customers, clients, citizens and other stakeholders.

This is why many sector codes and regulators are now focusing on culture. Consider the **Corporate Governance Code 2016** in the business community, the Care **Governance Code** and the **Integrity and Safety Monitor for Public Administration 2016** for the government.

This brochure describes an open and ethical organisational culture and how you can reinforce this in your organisation. It contains a practical strategy and ideas on how to improve your culture:
- **Section 1** provides a practical definition of culture.
- **Section 2** offers insight into the interaction between culture and other integrity measures in your organisation.
- **Section 3** presents 21 ideas based on an integrated model which will help you develop an open and ethical organisational culture. In other words: a culture that promotes the integrity of the organisation.

1.1 What is culture?

Culture has many meanings. In this brochure, culture refers to collective patterns of perception, thinking and acting in a group. These patterns are created by common learning experiences and provide guidance to the members of the group. They ensure that all members of a group know what they can expect from each other. Culture is most reflected in how people behave. However, this behaviour is based on patterns of perception and thinking, such as opinions and convictions, assumptions and basic principles, values and standards, prejudices and taboos.

Workplace

This brochure specifically addresses culture in the workplace. In an organisation, employees depend on each other in the performance of their work. They have to work together to implement their plans. This requires coordination: how do we work together and how do we resolve conflicts? In day-to-day practice, certain forms of coordination appear to work well. And what works gets repeated. That's our approach! In this way, collective patterns are created in the workplace. That's culture.

Practical details of culture
There are many different definitions of culture in science and in practice. It is a popular term in discussions on compliance, ethics and integrity. And rightly so, because there is a broadly shared consensus on the benefits of a good organisational culture. In science and in practice, employers benefit from an open and ethical culture in the workplace. This brochure provides a basis on which you can develop culture in your daily work. The scientific theory is not addressed here. However, this practical implementation is naturally based on science, research and interviews.

Not without obligation

An organisational culture is not without obligation. It even has a considerable impact on the behaviour of employees, who usually follow the patterns of the group. New employees soon become familiar with the routines in their new workplace. That's just how we do things here! So it's not surprising that a culture is so compelling. The collective patterns within a culture give the group guidance. When individual employees deviate from the patterns, uncertainty arises. An individual who acts differently than is prescribed by the culture runs the risk of being excluded from the group. This is characteristic for the influence of culture: to belong to the group, individuals will have to adjust to the group's patterns. In this way, they demonstrate that they belong.

Subcultures

Within an organisation, subcultures can also develop, for example within a department or team. Cultures external to the organisation can also have an influence, such as the culture of a professional group, sector or country. To keep things practical, this brochure addresses the culture of the organisation as a whole.

Compliance, integrity and ethics: different sectors and professional groups use different terms. This brochure is about developing a culture in which the desired standards and values of the organisation apply and are complied with. These are legal standards, with great emphasis on compliance. But it is also about moral values, which are key to ethics. In this brochure we generally use *integer* and *ethical* as synonyms for *desired standards and values*.

Good culture

A good organisational culture always pays off. The collective patterns in a group, which produces the culture, can be desirable or undesirable. A culture in the workplace might be good, but it might also be bad. It is often not hard to define what a poor culture is. For example, it might be one in which no one dares to express criticism (culture of fear), in which short term targets are always given precedence (performance culture) or in which departments cooperate badly (island culture).
But what is a good culture? What does it mean when an organisation has a good culture? A good culture is open and ethical.

1.2 Open culture

Above all, a good culture is an open culture. That means that the culture is dynamic and can adapt to a new situation. New challenges sometimes need a new strategy. A closed culture provides no scope for change and disagreement. In an open culture, on the other hand, employees can discuss and change the existing patterns. Is this the best solution? Does our culture reflect our social responsibility? Is this what to-day's society expects of us? These questions ensure that culture does not become frozen in time and that the organisation remains in touch with the outside world. An open culture responds to changes in society and among employees, customers, citizens, clients and stakeholders. There is room for criticism and disagreement. Such a culture stays alive.

A culture can also disappear. In that case, employees no longer preserve and pass on the collective patterns. An organisation without a culture is adrift. In the absence of a shared moral, employees are forced to plot their own course. The risk of integrity breaches, incidents and scandals rises.

1.3 Ethical culture

As well as being open, a good culture is also ethical or has integrity. That means that the culture incorporates the organisation's desired values and standards. These values and standards are expressed in the group patterns, the collective behaviour, the attitude and the convictions of the employees.

General standards

So what is an ethical culture? What values and standards are desirable in an organisation? Some values and standards nearly always apply, in every organisation. No organisation will accept theft, fraud or corruption. Openness and space to disagree is thus always desirable. And wherever people work, honesty and cooperation are appreciated.

Organisational standards

At the same time, there are also standards and values that are important within a particular organisation. Specific ethical requirements often apply within a branch or professional group. These depend on the nature of the work, the prevailing professional ethics and the mutual agreements. Furthermore, society as a whole also has expectations of each professional group or sector. For example, an accountant is required to be precise and independent, a teacher should treat all pupils equally and a car mechanic must not perform any unnecessary repairs. Together, these professional standards and social expectations form the desired ethics in an organisation. A good culture encourages these 'personal' values and standards.

It is important to identify the organisation's particular organisation ethics. What values and standards are important in your organisation? What is the desired culture? In a good (open and ethical) culture, collective patterns correspond with the desired values and standards. And there is room for disagreement and change.

Popular and problematic

Culture is a popular but also problematic term. Because it can have so many meanings, it is frequently used as an umbrella term. Rather than highlighting a problem in the organisation, this makes it even more elusive. Failing to give concrete expression to culture can make it difficult to take strong measures. Yet such measures are sometimes needed.

Sometimes organisations hide behind the culture concept to win time. Because everyone knows that when there is a culture problem, quick results cannot be expected. And organisations often use 'culture' to distance themselves from rules, processes and systems. But this is an illusionary contradiction. In practice, structures cannot be replaced by cultural measures. On the contrary, in an ethical organisation cultural and structural measures reinforce each other.

2 Culture and structure

The organisational culture has a huge influence on employees' behaviour. The importance of developing a good culture is now universally understood. In compliance and integrity management, however, the emphasis was initially on structure, on the 'hard controls' that employees could not circumnavigate: laws, rules, procedures and checks. This strategy was often given a legal character, focused on complying with rules and punishing breaches. Today more attention is given to culture and 'soft controls', which affect the convictions and perceptions of employees.

Combination

Nevertheless, it is not the case that culture is a (better) alternative to structure. That cultural measures are always better than structural measures. Academic research and practical experiences show that it is precisely the combination of structural and cultural measures that works best. Such a broad strategy has the greatest positive effect on integrity and ethics within an organisation.

> **This section tells you more about the relationship between culture and structure and presents a model for an integrated approach to ethics and integrity: the Integrity Infrastructure. In Section 3, this model is applied to culture.**

2.1 Cultural measures

You can work to create a good, integer culture by applying cultural measures. These are also referred to as 'soft controls' and largely relate to the convictions and perceptions of employees. Examples of cultural measures are:
- values sessions;
- code of conduct;
- introductory and mentor programmes;
- training and specific culture sessions;
- internal communication;
- employee surveys;
- giving and receiving attention to feedback.

> **Cultural measures make group patterns explicit and try to change undesirable patterns. Awareness, communication and dialogue are important components of this.**

2.2 Structural measures

It is not only the culture that influences employees' behaviour: structure also plays a role here. Structures might concern procedures or protocols describing how employees should act. Access passes and digital security levels determine what a colleague may and may not access. Disagreements can be aired in meetings held for this purpose or via an employee participation structure. Employees' behaviour is also determined through these 'hard controls', through the structures they encounter in the workplace.

Like cultural measures, structural measures give direction to how people work. Typical examples of structural measures are:

- laws, codes and rules;
- performance standards and remuneration systems;
- procedures and protocols;
- reporting and investigation procedures;
- adjustments in the work process;
- physical and digital access rights;
- granting of powers;
- checks and maintenance.

2.3 Continuous interaction

In practice, the structure does not determine everything that employees should or should not do. They might break the rules or avoid decision-taking procedures. Whether they do so depends on the culture in an organisation. In other words, the culture (partly) determines the effectiveness of rules and procedures. Anyone applying structural measures cannot ignore this fact. A safe that is never locked will do little to combat fraud management within the organisation. While employees working in a real security culture will not tolerate someone deviating from the protocol in such a risky manner.

When there is a problem in an organisation's culture, people are tempted to take cultural measures. Yet culture and structure are intertwined. When there are cultural problems, it is important to look at the structure and layout of the organisation as well. These also have a significant impact on the group patterns. Common examples are performance standards and bonus systems. These can create perverse incentives among employees and lead to a culture of short term thinking. If such organisations then provide too little direction and guidance to help employees resist this, the culture also fails. Organisations facing many risks or where checks are systematically inadequate (structure) are vulnerable to offensive behaviour and scandals, involving many employees. Such offensive behaviour soon becomes the standard situation.

> **Organisational culture and organisational structure are not alternatives. Obviously some interventions involve more structural measures and others more cultural measures. But they continuously influence each other. Ideally, they support each other.**
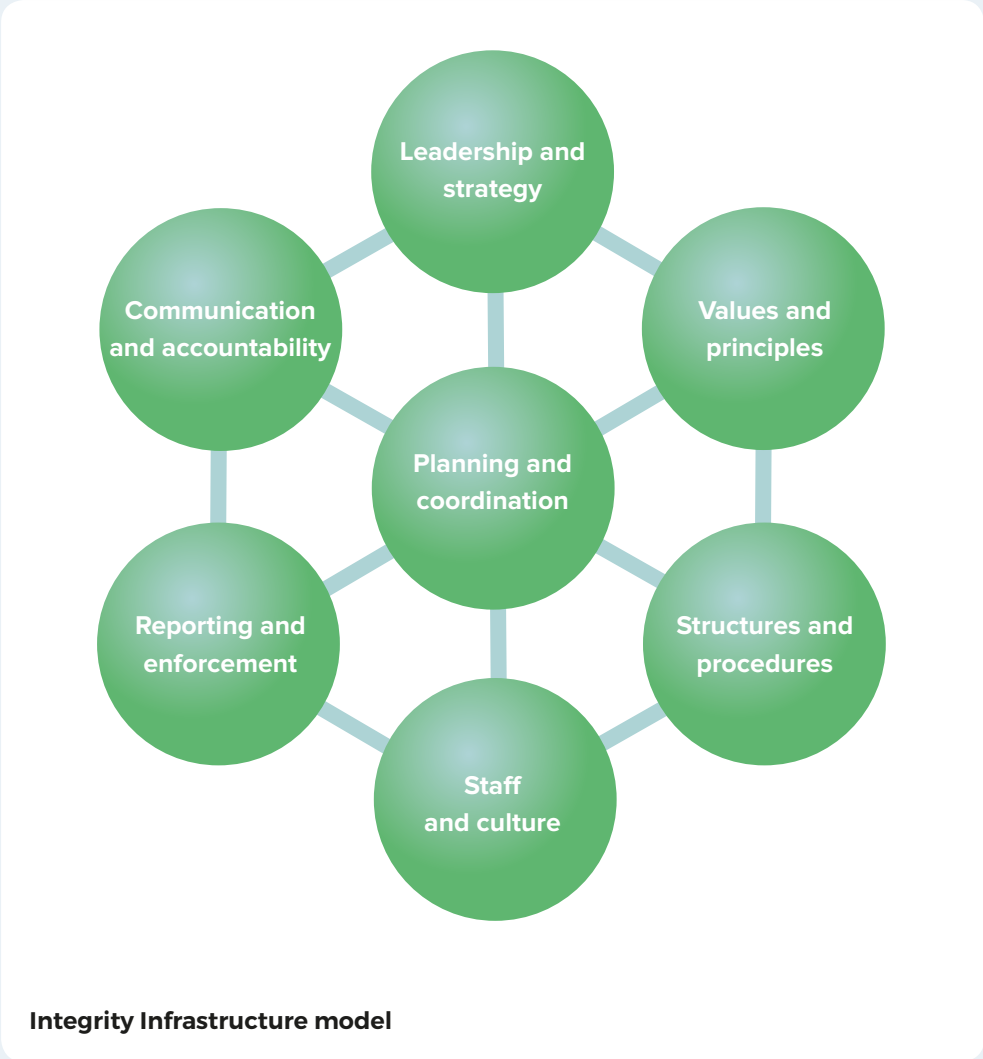
2.4 Integral strategy

If you want to work on your organisational culture, there are many tools and measures to choose from, both hard controls and soft controls. A code of conduct, training, a different bonus structure or strict camera surveillance: options enough. Each measure has its own advantages and disadvantages. Research has shown that such interventions only succeed within a sustainable, cohesive strategy in which different measures reinforce each other and interlock. But how can you ensure that your measures reinforce each other? And what should you focus on?

Integrity Infrastructure

The *Integrity Infrastructure* was developed to answer questions like this. This model is scientifically based and has been applied in the Netherlands (in various forms) for nearly ten years. Organisations abroad work with similar models. The model describes the seven dimensions of ethics and integrity management. These seven issues always require attention when seeking to improve the ethics and integrity in your organisation:

Leadership and strategy

Communication and accountability

Values and principles

Planning and coordination

Reporting and enforcement

Structures and procedures

Staff and culture

Integrity Infrastructure model

Three insights

The model is built on the three main insights in this field:

- *Work in an integral and multidimensional way:* ethics needs a multidimensional approach with attention to each of the seven issues. And it needs an integral approach: all your efforts affect each other. You can evaluate each effort with reference to the seven elements.
- *Combine hard and soft:* the model combines 'hard controls' (like regulations and enforcement) and 'soft controls' (like values and training). Both aspects are essential for a successful strategy.
- *Work in a sustainable and coordinated way:* integrity management cannot be created overnight. A consistent and sustainable approach with 'general controls' like policy cycle, risk analysis, evaluation and adjustments. Without these safeguards, investments in ethics have little chance of success.

Culture is one of the seven dimensions in the Integrity Infrastructure for a reason: it is a key focus area for successful integrity management. By working on an integer and open culture, you can improve the ethical quality of your organisation.

How can you go address this in practice? The following section presents various ideas. Because an integral, multidimensional strategy works best, you will also find suggestions on how to use the remaining six dimensions of the Integrity Infrastructure for your culture. This will show you how an integral strategy can work in practice.

3   Working on an integer culture

This section presents 21 ideas about how you can develop an open and ethical culture in your organisation. It includes suggestions from all seven dimensions of the Integrity Infrastructure. Your efforts can thus strengthen each other and enhance the ultimate effect. Furthermore, this section explains how the Integrity Infrastructure works. You can also use this model when working with your own ideas.

The 21 suggestions in the Integrity Infrastructure are not exhaustive. Use them for inspiration for more ideas.

3.1   Leadership and strategy

An ethical organisation can only be created if management invests in integrity with time, money and attention. Management must have a clear vision of the desired culture within the organisation and continuously and consistently express this in words and actions.

Activities & tools:
- Developing ethical leadership
- Work based on intention
- Scenario and trend analyses

Developing ethical leadership

Ethical leadership is more than merely acting with integrity yourself. Ethical leadership is about actively promoting integrity in the organisation. **Research** has shown that leaders generally tend to overestimate the visibility of their exemplary behaviour. Furthermore, they do not devote sufficient time (or money) on integrity management. Moreover, in the event of misconduct, managers often feel uneasy talking about ethics and being seen to enforce standards and values.

If you want to develop an open and ethical culture, invest in the ethical attitude and competences of the managers in your organisation. How can they present themselves as ethical leaders? Which values in your organisational culture motivate them? And what does working on integrity involve? Your managers can develop ethical management skills in personal development and reflection programmes.

Work based on intention

If an organisational culture becomes increasingly out of step with the organisation's original intentions, this may have serious adverse effects for the organisation and could even lead to scandals. Consider financial institutes whose complex and dangerous financial products cause them to lose sight of customer interest. Or car manufacturers who consider a cheap manufacturing process to be more important than the safety or environmental impact of the cars.

It is therefore crucial that an organisation continues to focus on its 'raison d'être'. In *Verdraaide organisaties (Twisted organisations)* Wouter Hart calls this 'work based on the intention'. The intention is the organisation's compass, the mission that provides meaning and direction to the choices it makes. What does the organisation represent? What can customers or citizens expect of it? What are its social responsibilities? The board can take the lead here and in doing so provide a compass to direct the organisation's desired culture.

Scenario and trend analyses

Ethical issues change in line with the surroundings and the times. New developments create new opportunities and risks. What developments, incidents and breakthroughs will affect how the organisation operates? By applying methods like scenario planning in the strategic vision, management can prepare for possible future circumstances. The desired culture and associated behaviour are also part of the future circumstances. For example, what does a larger flexible workforce mean for your organisation's culture? How do social media, cuts or reorganisations affect integrity? How do you want to manage cultural diversity? How might new legislation affect the organisation? In addressing these questions, you can steer towards the desired culture for your organisation in a forward-looking manner.

3.2 Values and principles

Values and principles represent what is important to your organisation, what all the employees stand for and what their responsibilities are. They are not without obligation, but provide guidance during everyday and difficult situations in the workplace. Values and principles are therefore a key reference point for the culture.

> **Values and principles are often bracketed together, but they are different. Values are what the organisation attaches value to and what everyone should steer towards. Principles indicate what is and is not desired.**

Activities & tools:
- Draft a code of conduct together
- List unwritten rules
- Share success stories

Draft a code of conduct together

A code of conduct formulates the organisation's values and principles. A good code of conduct provides clarity, inspires and supports employees when making decisions, whether these are easy or hard decisions. A code of conduct gives direction to the

desired culture in an organisation. However, it is important that this is a living document. Codes of conduct can tend to be a 'paper reality'.

According to research, a code of conduct will only influence the organisational culture if management has drafted this together with the employees. By working with your employees on the code of conduct, you will enter into dialogue about what conduct is desirable in your organisation. This dialogue is crucial for the desired organisational culture. Much more so than the final text of the code. *It's about coding, not the code*, says Muel Kaptein in *The Living Code*. This book provides guidance on how to make the code of conduct a living document in your organisation and to keep it that way.

List unwritten rules

Every organisation has a formal and an informal reality: the hidden rules of the game. The informal or hidden rules are often more effective and even go some way to determining behaviour within the organisation. On paper the procedures and processes are watertight. In practice, however, these are influenced by the informal reality. Consider key decisions that are 'precooked' outside the regular procedures, or information that employees share too easily by the coffee machine.

An organisation can only change these rules if employees and management are aware of them. During a cultural change, these hidden rules therefore need attention. By referring to the unwritten rules in a culture, more openness is created and the culture continues to be a living culture. There are many ways to do this. Practical guides can be found in the book *The Unwritten Rules of the Game: Master Them, Shatter Them, and Break Through the Barriers to Organizational Change* by Peter Scott-Morgan.

Storytelling

Values and principles often remain rather abstract for employees. You can give direction to your culture with joint *storytelling*: what is important to us, what do we value and what are we proud of? Telling stories makes the standards and values more concrete. Talk about your organisation, its history, the common future and how you want to achieve this. Let employees tell their stories. By sharing stories, everyone gains more insight into the existing culture better. It creates a bond and cohesion between people and work.

Share success stories
Are you looking for a good way to embed values and principles in the organisational culture? Success stories work best. These tell what employees are proud of and confirm what is important for the organisation. For example, how good is it when a colleague from *sales* tells how she was successful in concluding a major deal in an exotic foreign country without corruption or bribery? Stories like these encourage the desired behaviour. The *Jaarboek Integriteit (Integrity Annual) 2013* explains more about this method of sharing successful stories.

3.3 Structures and procedures

The structures and procedures in your organisation can contribute to integrity and reduce integrity risks. Ideally, the structures and procedures correspond with the desired values and standards and thus reinforce the desired culture. The work environment encourages the desired behaviour and unnecessary risks and temptations are removed. For example, if no cash is changing hands, it cannot disappear. However, rules, procedures and agreements in your organisation can also hinder the desired culture. For example, individual *targets* might get in the way of teamwork.

Activities & tools:
- Effect-check the rules
- Nudging and layout of the workplace
- Authority to make decisions and manage the finances

Effect-check the rules

Rules and procedures set out (sometimes very precisely) what employees should or should not do. In practice, rules are not always so effective. Colleagues find ways to avoid the rules and in doing so create undesired patterns in the culture. It is therefore important to regularly evaluate all the rules in terms of their effect, support and usefulness. Rules that have ceased to be useful, are inconsistent or hinder the proper performance of the work should better be amended or abolished.

> **One tool is the 'Tafel van Elf'. This analysis model comprises eleven factors that determine compliance with regulations. The *Tafel van Elf* gives you insight into the strengths and weaknesses of compliance with and enforcement of rules in your organisation.**

Nudging and layout of the workplace

Not only rules and procedures, but also the workplace layout influences the organisational culture. Sometimes in a very simple way: it is harder to steal something in a safe. Make sure that confidential information is not accessible to everyone by granting access rights. The workplace layout supports the structure in your organisation, but it also supports the culture.

Check whether you could apply nudging in your organisation. This psychological technique allows you to reinforce desired patterns in the culture while curtailing undesired patterns. For example, a spotless office will usually be kept tidier than a less spotless office. People tend to violate fewer rules in a place with lots of mirrors. The standard work in this field is *Nudge* by Rhirand Thaler and Cass Sunstein.

Authority to make decisions and manage the finances

Many procedures in organisations relate to making decisions and managing finance. Who manages (major) expenditures? Who gets a company credit card and what is its limit? And who decides to appoint or dismiss someone? In general, employees working higher up in the organisation have more authorities and are able to make key

decisions independently. Many integrity problems originate from such solo actions, such as concluding deals or approving payments that don't add up.

Organisations can prevent solo behaviour with *checks and balances*. For example, you can create control moments by agreeing an amount up to which an employee can decide independently and when they need to obtain approval. These control moments not only relate to money but also the awarding of contracts or recruiting or dismissing certain people. This is how organising decision authorisations and financial management smartly contributes to the integrity of your organisation.

At the same time, the way in which you structure these processes affects your organisation's culture. For example, would you like to see values like 'individual responsibility' and 'customer friendliness' reflected in the culture at your helpdesk? If so, you might want to give your employees a clearly defined budget to resolve minor problems. On the other hand, if there is too much individual responsibility for making (minor) payments in the culture, it might be a good idea to tighten the rules and introduce prior approval for expenditure.

3.4 Staff and culture

HRM policy is an excellent tool for influencing the culture in your organisation. You can adopt **specific cultural measures** as part of your staff policy, such as training, a campaign or awareness moments. Other HRM tools can also positively affect the culture, such as screening, selection, personal development and staff appraisals. These are all ideal moments to confirm and reinforce the organisational culture among employees.

> **Activities & tools:**
> - **Recruitment and selection**
> - **Appraising and rewarding**
> - **Introductory courses and mentorship**

Recruitment and selection
The recruitment and selection process is a good moment to work on culture. In the job vacancy post and during interviews, give the applicant a clear picture of the values and standards that have priority in your organisational culture. This allows applicants to decide (beforehand) whether these match them.

It is also essential to check whether the applicant's attitude and character are in line with your culture. Does the applicant represent the values and standards that your organisation considers important? How is this apparent from the application letter and the interviews?

Appraising and rewarding

Employees' behaviour is strongly determined by what they are appraised on and rewarded for. You can align your appraisal and reward policy with the values that you wish to see reflected in your organisational culture. It is important that you operationalise these values smartly. What employee conduct expresses the values that your organisation seeks to stimulate? You can reward this conduct.

For example, do you want to promote a culture in which employees work together more? You are more likely to achieve this with team appraisals than with a reward cycle with individual targets. And if you appraise and reward managers for their ethical leadership, you can ensure that they really start managing their people based on integrity.

Introductory courses and mentorship

Working on a culture that promotes integrity starts by impressing the organisation's values and standards on new employees. Some organisations offer introductory courses, while others allocate a mentor to a new employee. This mentor represents the values and standards that your organisation considers important. Mentors and exemplary figures can teach new employees a great deal about the informal forms of interaction in the organisation, in other words about the culture. The best approach is generally to link a new employee to a mentor for a longer period of time. This allows colleagues to learn from each other and share their experiences.

3.5 Reporting and enforcement

Things can go wrong in every organisation. In a good culture, employees are able to talk about it. In fact, in a healthy organisation employees sometimes go and talk to a counsellor or the reporting procedure throws up a signal. You can consider this as a positive sign. A justified and clear enforcement of rules and procedures contributes to openness and security within your organisation. Inconsistent responses to breaches or punishing more senior managers less severely than 'normal' employees, for example, could harm your culture.

Activities & tools:
- Reporting procedure
- Aftercare interviews
- Active counsellor

Reporting procedure

Sometimes employees might suspect misconduct in your organisation. These are usually loyal and concerned colleagues who are genuinely worried about something. Being able to report such misconduct quickly through a clear internal reporting procedure is very helpful. The Whistleblowers Authority has published a **brochure** containing guidelines for establishing such a reporting procedure. Most organisations are required to have an internal reporting procedure.

A good reporting procedure contributes to a culture that promotes integrity. A report is free integrity advice for your organisation. Make sure that the employee providing this advice knows that you appreciate it. In this way, you can demonstrate that disagreement, criticism and reporting are part of an open culture. It also makes it easier for other colleagues to express their advice and reduces the risk of a culture of fear.

Aftercare interviews

How you manage an incident can greatly affect the culture. A tale about an employee who reports something and subsequently gets into an escalating conflict with their manager or is only given difficult jobs to do does not make people willing to report anything or benefit the culture in your organisation. However, showing that your organisation does appreciate reports and takes them seriously will promote an open culture. Employees will then be more inclined to report misconduct.

Aftercare is a vital part of managing an integrity incident. Colleagues can learn from the incident through aftercare interviews. What went wrong? How can this be prevented in the future? This creates clarity about the desired culture. The effect will be even greater if the offender is also willing to share their experiences with the team. Every aspect of the incident can then be considered, enabling employees to really learn from it.

Active counsellor

Although organisations are not legally required to have a counsellor, they are indispensable to promoting a good culture. Employees can contact a counsellor about dilemmas at work and suspected misconduct, for example. Such meetings are always confidential. An active counsellor can reinforce a culture in which it is normal to talk about integrity, and where employees receive support in relation to ethics and ethical issues. This works best when the counsellor has a high profile and is visible in the organisation.

> **Good counsellors understand the organisation's culture. Without breaching confidentiality, they can observe general trends in the organisation or in certain departments. The official annual statements and informal meetings with the counsellor can give you insight into such cultural issues. You will be able to pick up possibly worrisome signals quickly.**

3.6 Communication and accountability

An ethical organisation actively accounts for its efforts to stimulate a good culture for integrity and incidents. This allows stakeholders to evaluate how your integrity policy is developing and whether your organisation meets the social expectations. Consider, for example, reports and annual reports for employee participation, your internal regulators or people representatives. By communicating transparently with employees, stakeholders and the press, both internally and externally, you will reinforce your culture's openness and send a strong signal that you take integrity seriously and consider it to be important.

> **Activities & tools:**
> - Management or (social) annual statement
> - Communication about incidents
> - Professional employee representations

Management or (social) annual statement

In many sectors, organisations are obliged to report on their efforts in relation to compliance, integrity and even specifically on culture. This is in accordance with the **Corporate Governance Code** and the **Care Governance Code**, for example. Apart from this, your management or (social) annual report is an excellent opportunity to put your culture on the agenda, inside and outside your organisation.

Through your management or annual report, you can inform your stakeholders on the work you have been doing with regard to integrity and culture. At the same time, this report will generate a discussion in your organisation about the values and standards that are important and how your culture expresses them.

Communication about incidents

Communication plays a key role during incidents and scandals. What should and shouldn't you disclose? How can you ensure that trust in your organisation is not damaged (even more)? At such moments, your culture has immense influence. In a closed culture, people tend not to share enough with the general public. The best strategy in most cases, however, is to identify the problem as soon as possible, openly and honestly. This is particularly important when you are communicating about an incident internally, within your organisation. By explaining to your employees what went wrong and how you managed the situation, you enforce the desired standards. It is therefore important to prepare your communication regarding possible scandals carefully, incorporating the values you want to see reflected in your culture.

> **In all communications, emphasise the importance of openness. This will ensure that your communications generate confidence. It will also limit any damage to your reputation, whilst reinforcing an open culture within your organisation.**

Professional employee participation

It is a good idea to invest in the professionalism of employee participation. When necessary, the Works Council can play a critical role and act as a counterweight to management. As a constructive partner, the Works Council can also ensure that there is support for changes and that new developments are appropriate to the organisation. A professional employee participation structure thus facilitates openness and participation. This reinforces a culture that promotes integrity.

The Works Council also plays a specific role of its own with regard to integrity. For example, the Works Council has to approve the mandatory reporting procedure for misconduct and the director is required to regularly account to the council regarding the working of the reporting procedure. A Works Council that considers integrity management important plays a dual role: the council can convey the importance of a good culture and encourage the organisation to work on culture and integrity.

3.7

Planning and coordination

Developing integrity requires a sustainable strategy. Efforts to promote a good culture will only be effective if they are cohesive. Furthermore, they must be based on a systematic policy cycle. There will preferably be an integrity manager, ethics or compliance officer who monitors cohesion, identifies risks and who coordinates, monitors, evaluates and adjusts efforts. This is particularly important if you are seeking to implement cultural improvements. Very many factors are involved in changing group patterns.

Activities & tools:
- Identify the integrity actors
- Reports on culture
- Joint risk analysis

Define the integrity actors

Compliance officers and integrity professionals play a leading role when it comes to developing a culture that promotes integrity **and they recognise this as well**. However, many different colleagues are involved in culture: management, HRM, counsellor, company doctor, audit, Works Council and the communications department. These colleagues are often unaware that together they can influence culture and integrity. The aim is therefore to coordinate all these efforts by defining all the integrity actors. Establish which professionals in your organisation play a role in promoting an ethical and open culture. Once it is clear who is in your 'integrity team', you can work together on a cohesive integrity policy. This makes it easier to get culture and ethics on the agenda and to coordinate efforts. If your management is not so keen on integrity measures, you will be stronger together.

Reports on culture

Without good information, it is difficult to work on cultural improvements. Produce periodic reports on the culture in your organisation. Do employees recognise and acknowledge the desired values and standards? How do they regard the management and what does management think of itself? Do employees feel safe in the workplace? Do they ever experience integrity breaches? These are all indicators of the culture. To find out what employees think about culture, you could use employee satisfaction surveys or perform specific culture assessments.

Such evaluations and reports reveal the relationship between the desired and actual culture and how it is developing. This enables you to evaluate whether your measures are effective. You can also use these reports in your communication and accountability. In this way, you demonstrate that you have a clear idea of the culture.

Joint risk analysis

There are integrity risks in every organisation. For example, where money is concerned, where confidential information is available or where colleagues work out of sight of others. Not every risk can be totally eliminated, but nor do you need to unnecessarily bring employees into temptation or danger. One option is to conduct regular risk analyses, allowing you to remove avoidable risks. A safe working environment with no unnecessary temptations benefits the culture in your organisation.

You can further reinforce the desired culture by conducting a risk analysis in a team context. Various methods are available through professional suppliers which enable employees to identify and discuss risks themselves. When employees are able to discuss integrity risks openly and without fear, you immediately boost integrity awareness and contribute to an open culture in the workplace. Finally, in a risk analysis you can also ask explicitly about culture aspects.

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