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# Approaches to Ethics Management in the Public Sector

## A Proposed Extension of the Compliance-Integrity Continuum

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### Abstract

The compliance-integrity continuum is the dominant framework for conceptualizing approaches to ethics management. This article proposes extending it in the form of a fourfold typology inspired by grid-group theory. An application to gift policies shows how the typology can support managers in their creative search for an appropriate approach. It also shows how the typology helps to avoid the deterministic thinking that is almost inherent in the use of a continuum. The article concludes with a recommendation as to how the four types should be combined in practice.

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Recent years have seen an impressive increase in interest in public sector ethics management, partly in reaction to public management reform in general (maintain, modernize, marketize, minimize; see Pollitt and Bouckaert 2000) and more specifically to New Public Management (NPM). These reforms include the introduction of competition both within government and between governmental agencies and private sector organizations, the use of performance management systems, a transformation of the role of the manager from administrator to public entrepreneur, and the introduction of instruments of quality management and a customer service focus (see deLeon and Denhardt 2000; Hood 1991). These reforms are alleged to have changed public sector values, and ethics management is seen as an appropriate reaction to complement these reforms and compensate for their possible negative impact on the ethics of public servants (OECD 1996, 2000).

The interest in ethics management has also been linked to broader changes in society. It has been proposed as a lever to restore trust in government in a time when concern about public trust in government is increasing all over the Western world

(Bok 2001; Norris 1999). It is also a reaction to society's changing values. Citizens are increasingly more assertive and demanding toward government. They are no longer satisfied with the traditional hierarchical accountability of public servants to their superiors and ultimately to elected officials. They also demand some form of direct horizontal accountability of the administrator to the citizens he or she deals with. Ethics management is a way to deal with these and other demands for changes in the ethos of public servants.

Those arguing for more and better ethics management usually make a distinction between two basic approaches. This article, using the conceptualization of the Organization for Economic Cooperation and Development (OECD, 1996, 2000), Gilman

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(1999), and originally Lynn Sharp Paine (1994), will refer to the two approaches as "compliance" and "integrity." Others refer to this distinction as the "low road" vs. the "high road" approach to ethics management (Rohr 1978) or the "verification" vs. "values" set of integrity institutions (Uhr 1999). The distinction goes back to the famous Friedrich-Finer debate on the respective

importance of internal and external controls on public servants (see Cooper 1998, 131–163).

The *compliance* approach to ethics management emphasizes the importance of external controls on the behavior of public servants. It prefers formal and detailed rules and procedures, and ultimately aims at a situation in which "the individual ethical choice is limited to choosing to follow the rules (the ethical thing to do) or to violate them by commission or omission (unethical acts)" (Fox 2001, 110). Typical instruments of this approach include legislation, strict behavioral ethics codes and other rules, extensive control mechanisms, and control institutions with extensive powers.

The *integrity* approach focuses on internal control—self-control exercised by each individual public servant. The internal control mechanism consists of two components (see Hejka-Ekins 1994). One component is the public servant's moral judgment capacity, which can be strengthened in two ways: by learning and understanding the necessary values and norms and by developing the skills in ethical decision-making needed to apply those values (particularly when they conflict with one another) in daily practice. The other component of internal control is moral character: the intrinsic will to act upon judgments reached through ethical decision-making. Integrity management aims to stimulate moral character and improve ethical decision-making skills through interactive training sessions, workshops, ambitious codes of values, individual coaching, and similar means.

As many authors have emphasized, these two approaches do not constitute a simple dichotomy but should be seen as the opposite ends of a continuum, and in practice they should always be combined and considered complementary (Gilman 1999). Cooper, for example, asserts:

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The critical task is to design a balance between internal and external control, as well as congruence between them. That is, there must be enough control from outside the individual to discourage those inclinations toward indulgence of self-interest, but enough internal control to encourage the most socially constructive, idealistic, altruistic, and creative impulses to flourish. . . .

However, it is also necessary that the internal and external controls reinforce each other; they must support the same kind of behavior. They must not give conflicting signals. (1998, 163)

A similar distinction and a similar plea for integrating both approaches have been made in the accountability/responsibility literature. Gregory and Hicks (1999), for example, argue for a “responsible accountability” as opposed to the typically “mechanistic” and restrictive forms of accountability. “Responsible accountability” is the best approach, they argue, because it combines “genuine transparency or visibility of individual conduct” (what Dubnick [1998] calls “conduct of accountability”) “with high levels of individual trustworthiness to act both competently and honestly in doing the job” (Gregory and Hicks 1999, 9). Bovens made a largely similar distinction between “passive responsibility” (accountability after the fact: “why did you do that?”) and “active responsibility” (responsibility as a virtue before and while acting: “what is to be done?”) (1998, 26–42).

This article will argue that the compliance-integrity continuum is a useful starting point for a conceptualization of approaches to ethics management, but that it has some built-in problems. It has at least two important blind spots, and, like any continuum, it also runs the danger of imposing a deterministic worldview on those who use the dichotomy. The article therefore proposes an expansion of the continuum based on grid-group theory, which originated in anthropology but is increasingly applied in political science and public administration. The first section presents grid-group theory and then shows how it suggests and justifies an extension of the compliance-integrity continuum when applied in ethics management. This discussion is essentially theoretical, but it is also aimed at practitioners, because the typology is expected to be an aid in the search for appropriate ethics management instruments. The second section, more explicitly practice-oriented, uses grid-group theory as a basis for the development of a practical recommendation on how to deal with a specific ethics management problem. The conclusion summarizes the expected advantages of the newly proposed typology over the traditional compliance-integrity continuum.

## **Expanding the Compliance-Integrity Continuum**

### *Grid-Group Theory*

Grid-group theory was developed in anthropology by Mary Douglas (1978) and was subsequently applied to political science (Thompson, Ellis, and Wildavsky 1990) and to a broad area of other social science fields (see Coughlin and Lockhart 1998; Coyle 1997; Douglas 1993; Hendriks 1999; Mars 1982; Schwarz and Thompson 1990). Central to the theory is its notion of types, conceived of, variously, as “cultural biases,” “interaction patterns,” and “cosmologies.” For present purposes the operationalization of Hood (1998a) is followed. He applied grid-group theory in public management and conceived of the four types as four styles of doing public management.

**TABLE 1**  
**Four Styles of Doing Public Management**

		Group	
		<i>Low</i>	<i>High</i>
Grid	High	Fatalist style	Hierarchist style
	Low	Individualist style	Egalitarian style

*Note:* Grid represents the extent to which individuals are constrained by rules, laws, and procedures. Group represents the extent to which individuals are embedded into social units.

Table 1 indicates that the typology is based on two dimensions: “group” and “grid.” Thompson et al. explain them as follows:

Group refers to the extent to which an individual is incorporated into bounded units. The greater the incorporation, the more individual choice is subject to group determination. Grid denotes the degree to which an individual’s life is circumscribed by externally imposed prescriptions. The more binding and extensive the scope of the prescriptions, the less of life that is open to individual negotiation. (1990, 5)

Thus, each of the dimensions refers to one of two very basic questions: “Who am I?” (group) and “What shall I do?” (grid). Together, the two dimensions form the basis of four types: hierarchy (high grid and high group), egalitarianism (low grid and high group), individualism (low grid and low group), and fatalism (high grid, low group).

The *hierarchist* style of doing public management is typified by a strong emphasis on rules and procedures: “Individuals in this social context are subject to both the control of other members in the group and the demands of socially imposed roles. . . . The exercise of authority (and inequality more generally) is justified on the grounds that different roles for different people enable people to live together more harmoniously than alternative arrangements” (Thompson et al. 1990, 6). When the management style is hierarchist, the nature of discretion for public servants will vary with formal status. At the lower levels of the organization, public servants will not have much explicit discretion, although their implicit discretion may be considerable (see Lipsky 1980). They are essentially expected to follow rules and procedures. At the top levels of the organization, there is much more discretion. Top public servants have the discretion to change the rules, provided that the appropriate procedures are followed.<sup>1</sup>

The *egalitarian* management style is much less mainstream than the hierarchist style, but Hood points out that it has an important history in public administration (1998a, 120–144). The style emphasizes the boundaries of the group and aims at equality within the group, “not equality of material conditions but equality of power relations. No one, in an egalitarian way of life, has the right to tell another what to do or what to be” (Thompson et al. 1990, 156–157). Practices and procedures that aim at increasing the participation of organizational members or of “clients” would fit in this category. Public servants are expected to use their discretion to discuss and negotiate with others (their peers, since it is an egalitarian context) about the decisions they make.

Typical for the *individualist* managerial style is the assumption that the behavior of individuals is ultimately always motivated by self-interest. This will not be a problem, however, as long as the organization is arranged in such a way that self-

interest coincides with the organizational or public interest. The best way to accomplish this is by ensuring competition among staff and among organizations. Hence, the individualist style creates a strongly competitive environment in which power relations will differ, not because of tradition or formal organization, as in hierarchy, but as a consequence of the constant competition. Public servants are given a considerable degree of discretion and are expected to use it in the way they see fit and for their own long-term benefit.

The *fatalist* style is somewhat unusual, as opposed to the other three styles, in the sense that it is usually not categorized as a typical style of doing (public) management. Typical for this style is that the discretion of the individual is strongly reduced by a large body of rules and other formal constraints, but in contrast with the hierarchist managerial style, this is combined with little social cohesion. As can be suspected from the pejorative appellation, fatalism is a style that can occur in practice but is usually not consciously wanted or advocated. Public servants in a fatalist context find themselves in a highly unpredictable environment where they have very little impact, and, because of the low social cohesion and widespread distrust, receive little cooperation or support from their colleagues. Despite this, the creation of a moderate form of such an environment has been advocated in the literature and consciously applied by public managers. Hood refers to this as control by “contrived randomness” (1998a, 145–167) and describes how the traditional tax bureaucracy has strong elements of contrived randomness: “Combining separation of different aspects of a transaction into different authorities, unpredictable postings around the field structure, snap inspections” (Hood 1998a, 161).

### *Grid-Group Theory and Ethics Management*

It is not very difficult to see where the compliance and integrity approaches to ethics management fit in the grid-group theory framework. The compliance approach counts as a prototypical example of the hierarchist management style. Proponents of both the compliance approach and the hierarchist style would agree that management, by providing enough rules and enforcement mechanisms, should aim to limit the scope of individual public servants for ethical decision-making. At first, the integrity approach seems a bit more difficult to situate. The emphasis on the individual’s moral judgment and ethical decision-making capabilities may suggest the misleading conclusion that the integrity approach fits the individualist management style. However, a closer look at the actual means through which integrity proponents aim to establish those internal controls reveals that it almost entirely fits the egalitarian management style. Emphasis is put, for example, on interactive training sessions with group discussions, bottom-up development of ethics codes, and regular staff meetings to discuss ethical dilemmas. Thus, the integrity approach is not only low-grid, in that it assumes a considerable degree of discretion for individual public servants to be able to use their own “internal control,” but also high-group and therefore egalitarian.<sup>2</sup> The value of the theory goes beyond this conceptual pondering, however. It also helps to address two problems inherent in the compliance-integrity continuum briefly discussed below.

First, it indicates two blind spots that are largely left outside the scope of the continuum. Specifically, and looking back at Table 1, the compliance and integrity approaches both turn out to be high-group approaches, in grid-group terms. Ethics management promoters seem to assume that low-group approaches are inconceiv-

able. However, such approaches do exist in practice and have also been described in the literature, albeit in the anti-corruption literature rather than in the ethics management literature. First, ethics management promoters exclude techniques that aim to reduce the scope for unethical and corrupt behavior by increasing competition, that is, the ethics management techniques of the individualist management style.<sup>3</sup> As a result, they overlook a number of contributions that could be very useful for the ethics management debate. In particular, approaches inspired by the political economy and public choice perspectives have focused on the use of competition to avoid corruption. Klitgaard (1988, 43), for example, explains how competition mechanisms can reduce corruption in various ways, such as by lessening the opportunities for public servants to corruptly charge monopoly rents. Similarly, in her landmark analysis of bureaucratic corruption, Rose-Ackerman discusses how competition can act as a

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check on corrupt incentives (1978). Second, the compliance-integrity continuum also excludes techniques that aim at randomizing contacts, that is, the fatalist management style. Nonetheless, fatalist practices to prevent unethical behavior still abound in practice: random posting of employees, unannounced random checks, preventing inspectors from working in the region where they live, and so on. Hood brought these diverse practices together in an ideal-type that he labeled the “gaming machine” model of organizing, which is as unpredictable as the “one-armed bandit” gambling machine it refers to. The model has two features (Hood 1998a, 161–163). The first of these splits up the authority to make crucial decisions among different people (“dual key structures”). Since decisions can only be made when all of them agree, corruption is only possible when they collude. The chance of collusion increases, however, when the incumbents keep their positions for a long time and thus are able to develop strong ties. Therefore the second feature designs the organization in such a way that no one in a responsible position has permanent tenure and people are rotated regularly. Another example of fatalism as a way to prevent corruption can be found in Rose-Ackerman’s (1978, 183–186) study. One of the four types of bureaucracy she discusses is “disorganized bureaucracy,” which can, under particular circumstances, be very effective in preventing corruption.

One reason for these two blind spots is that the ethics management literature developed somewhat separately from the literature about preventing corruption.<sup>4</sup> Ethics management supposedly takes a broader view, not simply aimed at preventing illegal behavior, but also seeking to foster genuinely ethical behavior. However, in their enthusiasm for developing an ethics management approach that goes beyond anti-corruption policies and by emphasizing the compliance-integrity continuum, proponents overlook useful individualist and fatalist instruments of ethics management. An additional reason for these blind spots, particularly for individualist measures of ethics management, is that the recent revival of ethics management was to a large extent framed as a reaction against the strongly individualist NPM rhetoric (Maesschalck 2004).

Table 2 summarizes the four approaches to ethics management suggested by grid-group theory. Each of the cells refers to a particular control mechanism (Hood 1998a, 1998b) and explains how it is applied as an approach to ethics management.

However, limiting oneself to a dichotomy or a continuum does more than simply cause a blind spot for an interesting set of alternative instruments and approaches.

**TABLE 2**  
**Four Ways of Doing Ethics Management**

		<i>Group</i>	
		<i>Low</i>	<i>High</i>
High	<p><b>Management by contrived randomness</b> Ensure considerable randomness and unpredictability in interactions so as to reduce scope for unethical collusion.</p> <p>Typical instruments: Random posting of employees, unannounced random inspections.</p>	<p><b>Management by oversight and review</b> <i>(compliance approach)</i> Provide rules, regulations, and clear task divisions; enforce them strictly.</p> <p>Typical instruments: Strict codes of conduct, ethics legislation, extensive control infrastructure.</p>	
	<p><b>Management by competition</b> Ensure as much competition as possible so as to avoid unethical monopoly rents or nepotism.</p> <p>Typical instruments: Competitive recruitment exams, competitive tendering.</p>	<p><b>Management by mutuality</b> <i>(integrity approach)</i> Allow public servants considerable discretion and support them in dealing with it.</p> <p>Typical instruments: Ambitious value codes, interactive ethics training, network of ethics advisers.</p>	

Those who perceive the world as a dichotomy are pushed into a deterministic worldview. Proponents of the compliance-integrity continuum, for example, are led to think that less compliance implies more integrity, and the other way around. Grid-group theory entails a more complex worldview, for it shows that there are two alternative end-states. Dunleavy and Hood (1994) developed this argument for statewide NPM-reforms. They showed how the move from hierarchy (“public bureaucracy state”) to individualism (“minimal purchasing state”) ended up in an egalitarian “headless chicken model” in some cases and in a fatalist “gridlock model” in others.

The discussion so far has presented the grid-group typology and applied it to ethics management. We have shown how the compliance-integrity continuum has a blind spot for two interesting approaches that are often used in the practice of ethics management, but tend to be left out of the theoretical and prescriptive literature. The section that follows will apply the fourfold ethics management typology to a concrete problem.

### **Assessing the Use of Grid-Group Theory in Ethics Management: An Application to Gift Policies**

#### *Gift Policy as an Organizational Dilemma*

Gifts and benefits received by public servants constitute one of the central areas of ethics management. The acceptance of gifts by public servants would undermine the

appearance (and reality) of an independent, neutral civil service that only serves the common interest. In principle, therefore, public servants are not allowed to accept gifts. And indeed there are many cases where accepting a gift would not only be manifestly unethical, but also illegal, particularly if the public servant is expected to give a *quid pro quo*. This type of behavior should be managed by use of the classical anti-corruption policy instruments. It is not the central focus of this article, however. The emphasis here is on situations where the border between the ethical and the unethical is much less evident. For example, there are situations where not accepting a present would be insulting. Should a public servant reject a small gift proffered by a citizen in gratitude for being treated in an efficient and friendly way? Similarly, there are situations where not accepting a gift would look absurd or even hamper a proper carrying out of the public servant's duty. For example, can a tax inspector who visits a factory on a hot day accept a glass of juice in the canteen, allowing him to have informal contacts from which he may learn about the firm's financial problems?

NPM-type reforms make these questions even more relevant. The reforms fostered by New Public Management do not simply introduce managerial techniques from the private sector into the public sector. They also seek to narrow the public-private divide through public-private partnerships and flexible employee mobility between the private and public sectors. This implies a blending and clash of value systems that can raise new ethical dilemmas and problems. In the private sector it is perfectly legitimate to develop close relations with customers by offering gifts. The public sector is an entirely different context in which neutrality and objectivity are crucial, and behavior acceptable (or even expected) in the private sector is seen as unethical or even corrupt. This does not imply that the blending of the private and public sectors is inherently bad for public sector ethics. It does, however, provoke ethical dilemmas and problems that require an adequate ethics policy.

Before we describe the four gift policies suggested by grid-group theory, it will be useful to emphasize that the gift problem, like every ethical problem in an organization, has two dimensions. First, of course, it is an *ethical* dilemma—is it ethical for a public administrator to accept (or give) gifts and, if so, under what circumstances? These questions are answered by use of ethical decision-making. In addition, there is a managerial problem—which approach will most effectively stimulate (or oblige) administrators to make the most ethical choice in practice? From this perspective the gift problem is an *organizational* and not an ethical dilemma. It concerns the question of deciding which instruments of ethics management should be applied and how. The discussion that follows will emphasize the latter dilemma, because the proposed typology presents ways of organizing, and not ethical theories.

#### *Four Gift Policies*

At the center of a hierarchist solution for the organizational dilemma concerning gifts will be a well-developed regulatory framework that establishes when and under what circumstances administrators can receive gifts. One example of this is the U.S. "government-wide standards of conduct," which specify, in eight pages, a number of explicit exceptions to the general rule that administrators are not allowed to accept gifts. Examples of these include soft drinks, coffee, donuts, greeting cards, and rewards and prizes given to competitors in contests open to the public. The

standards also allow the acceptance of unsolicited gifts with a market value of no more than \$20 per source per occasion and an aggregate value of \$50 in a year.<sup>5</sup> Another example of a hierarchist policy is the zero gift policy of the city of Houston, Texas, as advocated by Fain (2002)—all gifts, whatever their value, are considered improper. Although such a policy drastically eliminates regulations, it is typically hierarchist because it puts the rule at the center so as to eliminate any doubt. Hierarchists love clarity and rigidity, and are very uncomfortable with grey areas. These either elaborate or rigid regulations are typically accompanied by equally hierarchist control procedures. They entail audits or inspections with considerable power for the inspectors and elaborate specifications of the procedures to be followed.

The egalitarian managerial style emphasizes participation and social cohesion. Control in this context tends to be “inspector-free” and based on the mechanism of mutuality (Hood 1998b, 11–12). Applied to the gift problem, this would imply that nothing is explicitly regulated, but that decisions about the acceptability of a gift are made on a case-by-case basis in mutual agreement among the co-workers in a unit. This could be institutionalized in the form of regular staff meetings on the topic. But for the approach to remain egalitarian, it is crucial that these meetings do not develop strict and well-specified rules—the decision each time should be “up for grabs” (Hood 1998a, 9). Also typically egalitarian would be the arrangement among staff to collect all gifts and distribute them—for example, once a year among staff (without management).<sup>6</sup>

The individualist perspective sees competition as the ideal mechanism of control. Constraints on the freedom of the individual to compete should therefore be as limited as possible. Most formal rules and procedures forge competition and therefore entail suboptimal outcomes. They also invite self-interested individuals to bend the rules to their own advantage. Confronted with the gift problem, individualists would advise that the organization should provide no more than a minimal set of rules that prohibit the obvious forms of corruption. This would be the equivalent of the minimal legal framework that even the most ardent advocate of the free market ideology would accept (the basic rules of the game, protection of private property, etc.), since it is a necessary condition for genuine competition to occur. The discretionary space left by the minimal regulation should not be imbued with consultation among colleagues (as the egalitarians would propose), but should be left entirely to the individual. If there is enough competition, and if institutions are designed in such a way that the competition occurs on the basis of the right criteria, then those who behave unethically will punish themselves. For example, an administrator too sympathetic to those who give him gifts will not work efficiently and effectively, and this will affect his competitive position within the organization if, say, part of the wage is based on performance.<sup>7</sup>

The fatalist “gaming machine” model of organization leads to the fatalist solution for the gift-problem. For example, to prevent police officers on the beat from accepting gifts and bribes, fatalists would argue, they should be prohibited from going out on their own (“a dual key structure”). In addition, officers should be regularly rotated, swapping partners as well as patrol areas. Although this will, of course, come at a high cost, the advantage, from the gift policy point of view, is that this approach will significantly decrease the intensity and the predictability of citizen-officer interactions, and therefore make it much less rational for citizens to offer gifts and bribes to police officers.

It was argued above that the grid-group typology has two advantages over the

compliance-integrity continuum. These can now be shown for the area of gift policies. First, this brief list of some practical gift policy examples shows how grid-group theory aids a creative search, not only for theoretical alternatives beyond the compliance-integrity continuum but also for practical solutions for real-life problems like the gift policy dilemma. It shows how to look beyond the perspective that may be dominant in a given social environment, such as a classic Weberian governmental bureaucracy. Second, as was said above about ethics management as a whole, grid-group theory makes it possible to look beyond the deterministic view with regard to gift policies. Unlike a dichotomy, it presents several alternative possible futures. Say, for example, that an innovative egalitarian gift policy is introduced in a traditional hierarchical bureaucracy. The massive amount of rules and exceptions is drastically reduced and decisions will henceforth be made on a case-by-case basis in consensus among all members of the unit. If one believes that the compliance-integrity continuum grasps the whole empirical reality of the gift dilemma, then one will expect a reduction of compliance-oriented instruments and the introduction of integrity instruments to automatically produce a move away from “compliance” toward “integrity.”

However, grid-group theory points out that there are three alternative outcomes. Public servants may seize the opportunity of increased discretion to pursue their own self-interest and simply accept all gifts without consulting their colleagues, which would turn the egalitarian-intended measure into individualist behavior. Alternatively, administrators may not trust the egalitarian rhetoric behind the innovation. They experience their new discretion as simply another element that increases their uncertainty and reduces their knowledge about how to avoid punishment. Perceiving the egalitarian-intended intervention as an element that adds to their fatalist environment, they will not actively participate in the regular deliberations over the acceptability of gifts. Finally, as a fourfold typology, grid-group theory also has a third possible unintended outcome: The targeted public servants do not move to the desired end-state (egalitarianism), but simply stay where they were. Applied to the example, public servants socialized in a dominantly hierarchist environment may feel uncomfortable with their new discretion and use the meetings to establish rules and procedures that they can apply in a hierarchist way. In sum, grid-group theory maps the possible outcomes of an intervention and thus helps to avoid the deterministic view that an intervention can only have one outcome. The key in predicting the outcome of a particular intervention is a thorough understanding (in grid-group terms) of the initial state before the intervention takes place, as will be explained below.

### *Toward a Solution for the Gift Policy Dilemma*

Grid-group theory helps a creative search for new solutions, but a crucial question remains: Which is the best solution? If we take the four styles to be four categories of solutions for an organizational dilemma, which style should be chosen? There are roughly three strategies.

Before discussing them, it is useful to make a distinction between the five levels of analysis at which the question can be answered.

1. The managerial style(s) (in grid-group terms) underlying the *gift policy instruments* in the organization.

2. The managerial style(s) (in grid-group terms) underlying the *ethics management instruments* in the organization.
3. The managerial style(s) (in grid-group terms) underlying *all management instruments* (ethics management, HR management, financial management, etc.) in the organization.
4. The *organizational culture* (specified in grid-group terms) in the organization.<sup>8</sup>
5. The *environment* (specified in grid-group terms) of the organization.

Each level contains the sublevels below it, and thus the five levels could be graphically presented as concentric circles. Levels 1, 2, and 3 all concern managerial instruments. These can be consciously manipulated by the organization's management and are the object of the literature on prescriptive management, which contains "how to do" doctrines about public management (Hood and Jackson 1991). Levels 4 and 5 are merely descriptive categories: The organization's management cannot directly manipulate them by means of managerial instruments. Since the remainder of this article seeks to formulate some advice for public managers, the emphasis will be on the three levels that can be manipulated. Levels 4 and 5 will be addressed only as contextual elements that need to be taken into consideration by the organization's management.

### Strategy 1: Choose One Managerial Style and Perfect It

The most obvious strategy is to choose one of the four styles and then develop and refine it. This recommendation can be applied at every level of analysis. At the level of the gift policy in a particular organization, one could, for instance, choose the hierarchist style. One option, then, is to increase and refine the regulations concerning gifts incrementally. Whenever new problems occur or a new scandal erupts, a new layer of regulations and control procedures is added to narrow the holes in the system. At the second level of analysis (ethics management as a whole), it is also possible to apply the logic of incremental improvement by accumulation of rules. This is the approach that Anechiarico and Jacobs (1996; 1994) describe (and criticize). The third level of analysis concerns the overall management system. This is the level on which "the great paradigmata" (or, somewhat less respectfully, "the great trends") in public administration focus. From the perspective of the classic Weberian bureaucracy, for example, the advice would be to choose hierarchist instruments and bring them to perfection.

### Strategy 2: Ensure That New Measures Match Whatever Cultural Type Is Dominant at the Other Levels of Analysis

The problem with the first strategy is that the types are not all appropriate for the specific circumstances of a concrete organization. Formulated in the language of the leveled framework introduced above, the lower levels should match, in grid-group terms, the higher levels. As a matter of example, we focus on three key points where the different levels should match. First, the instruments of a gift policy (level 1) should match the other instruments of ethics management (level 2). It is important to

have a consistent ethics management to ensure that the different instruments reinforce each other in a synergetic movement. Second, the instruments of ethics management (level 2) should match the other managerial instruments (level 3). This aspect has been emphasized in the literature on public administration ethics since the introduction of NPM techniques. Gilman (1999), for example, observes how NPM techniques are introduced without a systematic and thorough investigation of their interactions with the existing instruments of ethics management. He proposes a “realignment” of ethics management with the reformed administration and suggests a number of ways to facilitate this. The Organization for Economic Cooperation and Development also emphasizes that the ethics management approach should be adapted to the other managerial instruments. Specifically, they propose combining NPM reforms with integrity-type ethics management techniques (1996). Third, the ensemble of management instruments (level 3) should match, in grid-group terms, the organization’s culture (level 4) and environment (level 5). This is, in fact, the grid-group version of the core argument of the so-called contingency school of organizational theory (e.g., Lawrence and Lorsch 1967).

None of these prescriptions for matching managerial instruments with other instruments, organizational culture, and the organizational environment is new. The innovative strength of grid-group theory is that it provides a clear language for specifying this prescription. Specifically, it offers a single overall typology that describes all the levels of analysis, from a single managerial instrument to the entire environment of the organization. As such, although the different levels contain very different things (instruments, values, interaction patterns), they can all be described in the same language.

### Strategy 3: Ensure That the Four Managerial Styles Balance Each Other at Every Level of Analysis

The second strategy clearly was an improvement over the first, but it still implies two important problems. First, it has a conservative bias. It assumes that the extant managerial style and organizational culture should be accepted, and that innovations are only possible to the extent that they fit the existing cultural bias. The second concern is more fundamental and is related to the fact that the second strategy can result in one single managerial style becoming dominant. This would be a transgression of what has recently become a central principle of the proponents of grid-group theory, namely, that there must be a balance between the four types within any social system (e.g., an organization or a national administration) if the system is to remain viable. Grid-group theory is, first and foremost, a theory to describe and explain the world and thus has no intrinsic prescriptive character. More and more authors in the field (e.g., Peri 6, Leat, Seltzer, and Stoker 2002; Thompson 1997) subscribe to this rule, however, on the basis of the theory and the increasing volume of empirical material it has been applied to. They ground this claim, roughly, on the following reasoning, which starts with descriptive observations about the problems with emphasizing one style but finishes off in a prescription about the advantages of balancing the four styles.

Each of the four management styles has its own built-in deficiencies and blind spots. Every time any of the styles is dominant in a defined social unit, the built-in problems will unavoidably occur in a fairly predictable way.

The area of gift policies provides some telling instances of this. Denhardt and Gilman (2002), for example, refer to the excesses of the hierarchist zero gift policy. In one case “an official received written advice from an ethics officer suggesting that the use of tissue paper and water in a private contractor’s facility might be construed as a gift” (p. 76). In another case, a major procurement procedure had to be cancelled after a losing applicant complained that an official had accepted a Big Mac and fries at the local McDonald’s. The cancellation cost hundreds of thousands of dollars and the official lost his job, in spite of the general agreement that the lunch did not affect his decision (pp. 76–77).

At the second level of analysis, the literature also provides interesting illustrations of what an ethics management that relies too much on a single management style might lead to. An example is the study of corruption control systems by Anechiarico and Jacobs (1996; see also Anechiarico and Jacobs 1994). They thoroughly describe and fiercely criticize the “panoptic vision of corruption control,” which emphasizes laws and rules, as well as elaborate and redundant procedures for control and inspection. They discuss at length the deficiencies of these strongly hierarchist instruments, building on the strong tradition of bureaucracy criticism that goes back to the classic works of Merton (1968), Crozier (1964), and others. According to Anechiarico and Jacobs, the heavily hierarchist instruments of the anti-corruption project lead to decision-making delay, overcentralization, inadequate authority, defensive management, goal displacement, poor morale, barriers to inter-organizational cooperation, and “adaptive strategies” like the creation of public authorities to circumvent bureaucracy (1996, 174–185). They call for fewer hierarchist instruments and introduce “a more sophisticated discourse” (p. 194) that also includes egalitarian and individualist instruments (see below).

Finally, at the third level of analysis, each of the four management styles has against it a whole tradition of criticism that points at its built-in weaknesses. Hood (1998a) builds on this literature when he describes the Achilles’ heel of each of the four types.<sup>9</sup> The inherent weakness of the hierarchist style is misplaced trust in rules and authority. There are many historical instances of how the blind following of rules leads to excesses. One example, which has by now become an icon, is the testimony of the German war criminal Adolf Eichmann at his trial in Jerusalem in 1961. In her famous analysis of the trial (1976), the philosopher Hannah Arendt pointed out that Eichmann was not a psychopath, but instead was considered “normal” by several psychiatrists and led a life that was, in many respects, exemplary. He was nevertheless capable of ruthless crimes, because he lacked any capacity for independent moral judgment in regard to his work. This capacity turned out to have been completely absorbed by the hierarchy in which he worked, leaving him only able to implement, in a quasi-mechanical way, the will of others. Pratchett offers a more recent version of the concerns about hierarchy, showing how rigid hierarchy is an important problem in times of change, like ours. “Institutional norms and customs may well deliver ethical practices by default. Problems arise, however, during periods of rapid and extensive change, when managerial and organizational practices become out of step with the broader institutional framework in which they exist” (2000, 123). The main weak point of the egalitarian management style, according to Hood (1998a, 28), is its unwillingness to accept higher authority to find a way out of conflicts. As a consequence, there is a great danger of long-lasting deadlocks or even open conflicts, which is, of course, a long way from the egalitarian

ideal. The inherent problems of the individualist style are well known. It assumes that everyone acts out of self-interest. Ironically, by making this assumption, the individualist managerial style stimulates such self-interested behavior through a “self-fulfilling prophecy” mechanism. The potential excesses are obvious: individual corruption, unwillingness to cooperate, self-indulgence, task-avoidance, to name a few. Finally, the excesses of the fatalist management style are also fairly obvious. The lack of social ties and the powerful constraints on discretion that typify this style, can lead to a passive, inert attitude even in situations where action would unquestionably be appropriate.

The claims laid out above are clearly empirical-descriptive in nature. The next two steps in the grid-group theorists’ reasoning lead to a prescription. In the second step, it is argued that excesses that occur because of the dominance of a managerial style can be reduced by counterbalancing the dominant style with other managerial

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***Organizations that want to be viable should make sure that each of the four management styles is appropriately represented.***

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styles. The third, and most speculative, step holds that it is not enough to counterbalance the dominant style with one alternative management style. Each of the four types needs all of the other three to define itself against and to make up for its deficiencies (Douglas and Ney 1998, 104; Thompson et al. 1990, 4). Thus, each of the four

management styles provides an important point of view that should, at least now and then, be taken into consideration if an organization is to survive. The obvious prescriptive deduction from this is that organizations that want to be viable should make sure that each of the four management styles is appropriately represented. In addition, given the incompatible nature of the four types, only temporary settlements between them are possible. Organizations that are able to establish such a volatile “coalition” have been called “clumsy institutions” (Verweij and Thompson forthcoming). They are a temporary resting point, at which there is a balance “in creative tension, rather than complete harmony, which is not available” (Peri 6 et al. 2002, 87). This is indeed clumsy, but grid-group theory argues that it is much more desirable than sole reliance on any one approach.

Three additional comments are necessary to clarify this recommendation. First, the recommendation to balance the four approaches does not imply that clear choices are impossible. A situation where one of the styles dominates is certainly imaginable—and may also be desirable in certain local circumstances. But in such cases, care should be taken to give some minimal representation to the other perspectives so as to maintain the ongoing debate between the four types and thus to avoid excesses. Second, this recommendation focuses at the second and third levels of analysis. The first level (e.g., a gift policy) is not included because it is very difficult and not necessary to achieve genuine “clumsiness” at this low level of analysis. The fourth and fifth levels are not the focus of the recommendation either, because the organizational culture and environment largely present themselves as a given to the organization’s managers, and not as something they can manipulate. Finally, it is useful to note that the core of this prescription (the necessity of balancing the different approaches) is not new. Durkheim, the intellectual grandfather of grid-group theory (which is sometimes called the neo-Durkheimian approach), argued for settlements between different ways of life, which he called “organic solidarity,” as opposed to “mechanical solidarity” (Peri 6 et al. 2002, 83). Closer to ethics management,

the very idea of the compliance-ethics “continuum” implies the idea of a balance between both. The innovative part of grid-group theory is that it provides a language, as well as a broader typology, to further specify this advice.

### *Integrating the Strategies*

The foregoing discussion expresses a clear-cut preference for the second and the third strategies. The problem is, however, that they are, in fact, contradictory. The second implies “more of the same” and can therefore result in the dominance of one managerial style. This is in contrast with the third, which implies that the aim should always be to achieve a balance between the four approaches.<sup>10</sup> A synthesis between the approaches is sought in the following:

*In any given organization, ensure that the dominant type(s) of applied ethics management instruments match the dominant type(s) of the other management instruments (level 3), the organizational culture (level 4), and the organizational environment (level 5), and ensure, at the same time, a “minimal representation” of the other types at all these levels.*

Two examples can illustrate this. To begin, Denhardt and Gilman (2002) relate an interesting example in the area of gift policy. As was explained above, a genuine balance between the four types is not necessary at this lowest level of analysis, nor is it usually feasible. Nonetheless, it is useful to work out as an exercise, at this level, whether there are any alternatives to the dominant approach. This is what Denhardt and Gilman do with regard to gift policies when they propose complementing the typically hierarchist instruments (rules and control mechanisms) with the egalitarian measure of requiring disclosure of all gifts. Such a provision, they argue, “puts the emphasis on transparency rather than rigid rules, and it allows for public dialogue about what constitutes a reasonable situation” (p. 79). It is important to note that they present this egalitarian instrument not as a “one best way” alternative, but as a complement to the hierarchist instruments. Thus, their advice fits the recommendation made here to balance several approaches, albeit to a limited extent as this is only at the lowest level of analysis.

A second illustration comes from Anechiarico and Jacobs, who propose an alternative to the dominantly hierarchist anti-corruption project. Although it is debatable whether hierarchist control should be reduced as drastically as they propose, they offer some interesting individualist and egalitarian alternatives. Typically egalitarian, for example, is their suggestion to consider rank-and-file administrators as key participants in an anti-corruption policy (1996, 197) and to “move towards participatory management, so that a significant portion of agency personnel identify with the agency’s mission” (p. 202). They also share the egalitarian trust in “peer pressure to persuade government employees to ‘do the right thing’” and consider integrity training a step in the right direction (p. 202). They combine this with a strongly individualist plea for more emphasis on efficiency and effectiveness, as in the monitoring of the performance of contractors. When such measures complement the hierarchist instruments in place, they move the organization a few steps closer to the desirable state of clumsiness.<sup>11</sup> However, the actual success of this new mix will strongly depend upon its adaptedness to the local context of the organization, as

Anechiarico and Jacobs themselves point out: “The right level and mix of corruption controls will undoubtedly differ from governmental unit to governmental unit and from agency to agency within the same governmental unit. Moreover, the optimal level and mix may change over time” (p. 198).

Although rooted in theory and building on empirical research, this recommendation is, of course, just that—a prescription. But it could easily be reformulated as a hypothesis that can guide empirical research:

An organization will only be viable on the condition that the dominant type(s) of applied ethics management instruments in that organization, match the dominant type(s) of the other management instruments applied in that organization (level 3), the organizational culture (level 4), and the organizational environment (level 5), and ensure, at the same time, a “minimal representation” of the other types at all these levels.

The hypothesis should specify that this balance between the four types is a necessary condition for an organization to be viable, but not a sufficient condition. Only a limited number of settlements between the four types are actually viable. And thus a crucial question for further empirical research will be which settlements are more viable than others and why. Such exploratory research should make it possible to further specify the hypothesis, the recommendations based on it, and the conditions under which it is valid.

## **Conclusion**

On the basis of consultation with a worldwide sample of important experts on public sector ethics, Rohr (1990, 119) concluded that there is much disagreement, but that “there is an emerging consensus over the precise nature of the ethical problem that is peculiar to the career public servant. . . . That problem is the responsible use of administrative discretion.” This article focuses on the managerial aspects of this problem, the question of how an organization can ensure responsible use of administrative discretion. Traditionally, ethics management has proposed two alternative roads and argued for a well-considered combination of both. By using grid-group theory, this article has expanded the discussion by suggesting four ways of dealing with the dilemma and argued for a balance between them in consonance with the local circumstances. This has been formulated as a prescription, but it could, in fact, easily be reformulated in a hypothesis that can guide empirical research.

Grid-group theory has two important advantages, from both the academic and the practitioner points of view, over the traditional compliance-integrity continuum. First, as it goes beyond the dichotomy, in that it not only stimulates creativity in the search for alternative solutions, but also helps to transcend the determinism inherent in a dichotomous view of the world. Thus, it helps to assess the consequences of an intervention in a more sophisticated way than would be possible through the lens of a dichotomy. Second, because its typology can be applied to all aspects of social life, grid-group theory provides a background much richer than a typology that only focuses on ethics management. This is especially helpful for assessing the consistency of ethics management instruments with other management instruments, the organizational culture, and the environment. This “universal” language, which describes both ethics management instruments and other organizational elements, helps to prevent the tendency, so difficult to avoid when studying organizational ethics, to

overestimate the impact of ethics management measures. The administrative and business ethics literatures put a great deal of emphasis on ethics management instruments such as codes, ethics offices, and ethics training. Empirical research abundantly shows, however, that these instruments are just a few among the many factors that have an impact on ethical decision-making and behavior (for reviews, see Menzel and Carson 1999; Ford and Richardson 1994; Loe, Ferrell, and Mansfield 2000). Moreover, to the extent that ethics measures have an effect, this occurs in conjunction with the other managerial measures, the organizational culture, and the organization's environment. The grid-group typology provides a language not only to describe ethics management, but also to conceptualize all the other factors that shape ethical decision-making and thus helps to avoid a disproportional emphasis on the instruments of ethics management.

However, probably the most important contribution of grid-group theory is its general advice that no single approach should be allowed to dominate everything and that one should always consider the problems inherent in each approach. This principle looks almost self-evident, but it is undoubtedly a rule often transgressed in practice. The so-called practice-oriented management literature, in its enthusiasm for a particular approach, often develops blind spots for its inherent problems. From this point of view, grid-group theory's qualifications and recommendations, which may have looked very abstract and theoretical at first, can turn out to be quite practical and useful. Nevertheless, the recommendation is at this point more motivated on theoretical than on empirical grounds, and it is still formulated in very abstract language. Hence, two steps for further development can be suggested. First, the empirical claims that underlie the recommendation need to be tested. Is a social unit where only one perspective is dominant really not viable in the long run? Are all four perspectives really necessary to keep an organization viable, or are two or three perspectives sufficient? Second, empirical research is necessary to describe what the recommendation actually means in practice. What is a "minimal representation" of each of the four perspectives in practice, and precisely what is the minimum? What kinds of settlements between the four types are most successful, given a certain environment, and how can this success be explained? This article argues that such an empirical research project could be more useful than research focused only on the compliance-integrity continuum.

## NOTES

1. The author thanks Perri 6 for this important qualification.
2. This classification exercise shows how grid-group theory can help to make explicit the assumptions underlying a management approach.
3. There are some recent indications of individualist instruments being considered for ethics management. The tendency, however, seems to be for proponents of individualist approaches to expand their framework and include ethical considerations, rather than for ethics management scholars to include individualists arguments. Cohen and Eimicke (1999), for example, argue in favor of individualist entrepreneurship in government, but at the same time also formulate five ethical principles such entrepreneurs should respect. Similarly, Borins's study of "innovating with integrity" (Borins 1998, 1999) has a strongly individualist focus—"encouraging heroism in the public service" (1998, 284)—while at the same time also considering integrity aspects.
4. The primary reference in the field—Cooper's *Handbook of Administrative Ethics*

(2001)—has one chapter on anti-corruption management, but the rest of the book makes almost no reference to corruption and corruption prevention.

5. Part 2635 of the “Code of Federal Regulations,” described in Denhardt and Gilman (2002, 77) and in Roberts (2001, 374–376), and available at [www.usoge.gov/pages/laws\\_regs\\_fedreg\\_stats/oge\\_regs/5cfr2635.html](http://www.usoge.gov/pages/laws_regs_fedreg_stats/oge_regs/5cfr2635.html).

6. When it is specified in rules and procedures, this practice would, of course, be an egalitarian-hierarchist hybrid.

7. It is obvious that the individualist style also implies its own ethics and will probably be less critical than the other styles about accepting gifts. However, as explained above, this paper focuses on the organizational dilemma, rather than on the ethical questions.

8. Organizational culture is here defined in a very broad sense: managerial instruments (see level 1 to 3), interaction patterns among organizational members, and norms and values of organizational members.

9. Linda deLeon (1993) developed a fourfold typology of organizational structures that resembles the grid-group typology. For each of the types, she discusses the associated values as well as the pathology that results when the values are perverted.

10. In practice, there will not always be a contradiction between the second and third recommendations. If the organization’s culture and environment represent all types sufficiently, then the second recommendation (adapt to the organization’s culture and environment) will lead to the same result as the third (balance the four styles).

11. At the end of their book, Anechiarico and Jacobs (1996, 204–207) present and endorse a model that was developed by Vincent Ostrom. It proposes “the devolution of governing authority to a multiplicity of ‘communities of interest’ that are specially concerned with each specialized type of governmental service” (p. 205). This model of “democratic administration” is an interesting hybrid of egalitarianism, individualism, and hierarchy.

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