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The Institutionalization of Integrity Policies and the management of a growing ethics bureaucracy

Christoph Demmke¹

Abstract

Studying the ethical dimension of institutions, the relationship between organizations and moral, and ultimately the management of ethics policies are elusive undertakings. What is the relationship between institutions, organizational design, ethics and workplace behavior? And, vice versa, how do ethics policies influence the workways, capacities and resources of organizations and institutions? Overall, examining the management of an emerging ethics bureaucracy is “a black box” in the field of public service ethics.

Instead, for a long time, the focus has been on the input and adoption of ethics policies and the perception that *not enough is done* and more and stricter standards are needed. Differently than in other policies, it is unwise to call for a deregulation of ethics policies and the need for reducing administrative burdens in the field. Consequently, the focus of attention has been less on the management and institutionalization of policies. It is still rare to discuss the emerging ethics bureaucracy from a critical point of view. However, as we will claim, almost all countries are in a process of developing ethics bureaucracies.

As such, current forms of regulating, institutionalizing and monitoring ethics policies are highly ambivalent. Frequently, experts applaud if more and tougher (transparent) disclosure requirements are discussed. However, there is very little discussion about dilemmas and, for example the need for monitoring highly personal and private interests. Overall, emerging ethics bureaucracies are costly, time-consuming, technical, formalistic and – often – focus on the individual-, not the organizational

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causes for wrongdoing. Managing ethics policies is also a highly dynamic and “fluid” task, which constantly causes new emerging organizational challenges. As we will claim, what matters most is that Ethics policies can only be effective if they are integrated into other management- and governance logics. Otherwise, the management of ethics policies becomes more bureaucratic, but not necessarily more effective. As such, the relationship between organizations and integrity is highly complex.

1. The importance of institutions and institutional design for ethics

Organizational theory and organizational behavior theories claim that it is impossible to understand ethics policies without the way public institutions work and without analyzing how they are organized and their modes of working (Christensen/Laegreid & Rovik, 2020, 1). Interest in the power of institutional design and the so-called “institutional turn” originated well back to the French Sociologist Durkheim and was popularized by the United Nations in the 1980’s and 1990’s (Evans, 2005; Evans 2006)). “The institutional turn can be defined in very broad and loose terms as the more or less consistent elaboration of the intuition, hypothesis, or discovery that ‘institutions matter’ in one or more theoretical, empirical, or practical contexts where their existence and/or relevance had previously been overlooked, denied, or deliberately ignoredInstitutions matter in so far as they provide the best entry point for understanding social life” (Jessop, 2001, 1213, 1217).

During the last two decades, renewed interest in the impact of institutions and the importance of the quality of institutions became a characteristic of the “Good Governance” discourse. From now on, governments and international organizations acknowledged the link between institutional design, organizational behavior and government outcomes (Rothstein, 2012). An “important trait of well-functioning states are good institutions” (Ahlerup, 2021, 359). These should be merit based, impartial, participatory, accountable, transparent, responsive, and inclusive while respecting the rule of law

(Dahlström, Lapuente & Teorell, 2012; Dahlström & Lapuente, 2017). A growing body of Good Governance literature (Mungiu-Pippidi, 2015; Mungiu-Pippidi & Johnston, 2017; Mungiu-Pippidi, 2020) also backs up claims to which good governance features are linked to positive governance outcomes such as lower corruption levels, higher trust levels, enhanced organizational- and individual performance etc. In the meantime, a solid body of research exists (Bågenholm, Bauhr, Grimes. & Rothstein, 2021) that links the quality of governance, institutions and management practices to governance effectiveness and positive ethical outcomes (Meyer-Sahling et al, 2021; 2020; 2019).

2. Ethics and Bureaucracy

Current trends towards “illiberal democracies” support the politicization of organizational- and ethics policies (Demmke et al., 2021a). This stands in contrast to the rule of law doctrine, which starts from the assumption that organizations are supposed to act rather amoral, legalistic, standardized and functional. A fundamental feature of modern organizations was the separation of morality and function and their impersonal and factual character. Subjective and emotional behavior was subordinated to the objectives of the “iron cage machinery” (Weber). Therefore, Weber defined bureaucracy as an organization without regard to persons and as an impersonal and technical system. For Weber, integer management could only be possible in an impersonal bureaucratic system. Also, most governments worldwide expected that a specific organizational structure, organizational culture, the existence of constitutional principles and values, rules and specific working conditions would produce certain ethical behavioral patterns and a specific public service motivation of civil servants who would be committed to the public good, neutrality, impartiality and to observing confidentiality and displaying expertise. Indeed, Meyer-Sahling, Mikkelsen and Schuster (2018) and Schuster, Mikkelsen, Correa and Meyer-Sahling (2021) show that public service motivation supports ethical behavior.

Because of the specific treatment of civil servants, public perceptions arose of civil servants having different personalities, being motivated by different incentives, working less hard than employees in the private sector, being more security-minded, more rule-oriented and not very innovative. Subsequently, this behavior was called “bureaupathic behavior” (Thompson) (Bozeman & Rainey, 1998). In “Unmasking Administrative Evil”, Adams & Balfour (1998) established the connection between an impersonal and functional bureaucratic structure and the holocaust. According to the authors, the Holocaust was only possible in a perfect system of extreme obedience, loyalty and instrumental (technical) rationality. In administrative theory, this administrative explanation for the holocaust was of utmost importance and well accepted although the concept of “administrative evil” was also strongly linked to the specifics of (German) bureaucracy. In fact, “administrative evil” can be linked to various contexts. Adam (2011) claimed the “common characteristic of administrative evil is that ordinary people, within their normal professional and administrative roles, can engage in acts of evil without being aware that they are doing anything wrong. Under conditions of moral inversion, people may even view their evil activity as good” (Adam, 2011, 275). Thus, types of administrative evil may be associated with various concepts of organizational culture.

„If people are surrounded by conduct that is morally abominable, or seeing a lot of it, they will not disapprove of, and may be even be fine with, conduct that is morally bad (...). That is the power of normal “(Sunstein, 2021, 21). If „mandates and behavior in general get worse, things that were once seen as bad or even as terrible may come to be seen as mildly distasteful or even fine “(Sunstein, 2021, 21). For example, research has identified organizational routines as potential sources of ethical blindness, blind spots (Bazerman & Tenbrunsel, 2011), or unintentional unethical behavior (Bazerman & Sezer. 2016). Yet, administrative routines also exist in various organizational forms. They are recognizable patterns of administrative actions and can be associated with many organizational workways. According to Kump & Scholz (2022), routines “may play a much more

important role in the occurrence of unintentional unethical practices and may be more dangerous in this regard than is currently acknowledged” (Kump & Scholz 2022, 2).

Contrary to this, also administrative reforms and innovation are not free of ethical contradictions and ethical challenges. Today, the blurring of boundaries between public- and private sector organizations and the introduction of new public management concepts have also changed values, value expectations and created new ethical challenges. De-bureaucratization trends have also paved ways to new requirements that organizations should act moral, functional (Demmke, 2020). Increasingly, management practices also design personal modes of management.

3. Ethics management in times of individualism and behavioralism

Whereas the traditional focus on organizational theory supports the view that the institutional design influences personal behavior and that amoral, functional and de-personalized types of organizations are too be preferred, this has changed in the course of time. Examining today’s institutions from the “perspective of bounded rationality leads quickly to the understanding that the cognitive architectures of individuals affect the institutions they inhabit” (Shannon, McGee & Jones, 2019).

From an ethical point of view, both concepts are problematic. The first, because it perceives organizations as machines and people as instruments. Overall, management is also associated with the expectation that organizations act rational, functional and impersonal (Kuehl, 2020, 147). The second, because it perceives institutions as hosts of emotions, imperfect decision-making and constantly shifting (individual) justice perceptions. In "Greedy" Institutions, Coser discusses the dangers and challenges that can arise when moral "greedy institutions" demand total (behavioral) commitment, personal engagement, emotions and loyalty from their employees. Similarly, Anderson discusses the critical consequences if moral management informs employees how to behave

(Anderson, 2017, 25) and organizations and institutions become hosts of emotions, imperfect decision-making and (individual) justice perceptions.

These “affective” forms of management raise the question about the limits of personal and emotional forms of management that builds on theories of “bounded rationality “. Whereas it is commonly accepted that work (in the public sector) is not always predictable, clear, objective and rational, instead, it is also paradoxical, individual, value-laden, emotional, pluralistic, political and unpredictable. However, consequently, planning and installing a rational ethics management is difficult.

Thus, today, moral reasoning and workplace morality (Kvalnes, 2015; Kaptein 2013; Kaptein 2022) are considered to be highly contingent and situational in different administrative cultures. New behavioral insights place doubts whether the planning of a rational ethics management system that achieves full integrity is possible at all (for example, if irrational and unethical choices are constantly also made by people who in general want to behave ethically and rational). De Bruin, Russell, Kaptein & Meijs (2022) show that moral goodness may also generate unethical behavior, for example through moral justification, moral superiority, moral naivety and the own glorification of knowing what is moral and right. Employees can act also pro-socially in ways that break rules, commit injustice, demonstrate dishonesty or, simply violate ethical standards (Bolino & Grant, 2016, 3). Research about altruistic behavior, organizational citizenship behavior (OCB), the good-soldier syndrome (Turnipseed, 2002) or (unethical) pro-social behavior conclude that - even - the desire to act with full integrity can nonetheless have negative organizational consequences (Turnipseed, 2002; Spector & Fox, 2010; Bolino & Klotz & Turnely & Harvey, 2013; Gino, 2015, Bolino, 2016). Overall, employees that are subject to various forms of organizational injustice, unprofessional and disrespectful treatment career pressure can commit organizational evil (Scharpf & Glässer, 2022). Moreover, the threat of management to dismiss employees, too demanding organizational (work)

targets, too little job control and job autonomy, too high stress levels etc. can produce negative individual and organizational outcomes.

Still, while managers must accept that organizations (and people) often do not act in rational ways (and behavior is characterized by biases), this does not mean that people and organizations are cognitively incapable of doing the right thing. Overall, organizational behavior is also surprisingly robust and rational, even in complex situation (Trondal, 2022). Thus, existence of bounded rationality does not automatically mean that organizations have become hosts of irrationality. Equally, functional and impersonal behavior, hierarchical structures and law obedience are still important ingredients of organizational life. From the ethical point of view, applying the law or superiors' orders is usually not problematic. It is still a very relevant guideline for public officials, as it highlights the importance of the rule of law and loyalty to the democratically elected government. What matters is that individuals are treated as individuals, ethically and not as instruments. This does not mean that public institutions cannot be spaces of reasons and stick to those administrative principles that are still important, such as the principles of rule of law, impartiality, equity and fairness.

4. The importance of ethics management

So far, our discussions focused on the question how organizational settings influence ethical behavior. However, it is of equal importance to study how ethics policies influence organizational settings and management practices.

Today, when asked about their reasons for institutionalizing ethics in public- and private organizations, politicians and managers mention their ethical duties and the need to enhance trust. However, increasingly, most evoke, either directly or indirectly, the positive effects on individual and organizational performance, economic benefits to company, reputational reasons, or simple ethics as

a branding instrument, or as a mean to implement legal requirement, as recruitment or retention strategies for employees.

Thus, in part, today's more sophisticated understanding of the complex linkages between ethics and institutional design can also be explained by new insights into the relationship between ethics and organizational performance, recruitment and retention policies, public trust, legitimacy, employee motivation and commitment. In addition, employees in organizations with integrity are less affected by stress, anxiety, insecurity and emotional exhaustion, which means a lower sick leave rate in these organizations (Hoekstra, 2022).

Thus, all of these insights and developments explain why ethics policies have become a proper public policy and current developments continuously lead to an expansion of the meaning, importance and the practical expression of the concept of integrity policies. This growing importance of ethics policies and bureaucratization of ethics policies increasingly influence the workways of organizations. Overall, integrity management develops into a popular, distinctive, specialized, sophisticated and professionalized policy. Also, more International Organisations (like the UN, IACA and the OECD) and Governments invest in the (improved) measurement of integrity policies. Integrity management is not only becoming more professional and better institutionalized, but also complex and costly. The growing popularity of the concept of institutional ethics rests in large measure on the growing belief in its organizational-, economic- and individual importance. In 1983, Bowman (Bowman, 1983) was actually the first to move beyond a focus on individual conduct and, instead, also the importance of the organizational context (see later, Cooper, 2001; Frederickson & Ghore 2013; latest Bowman & West, 2021). In Europe, Kolthoff (2007) opened the discussions about the impact of public management reforms on integrity. According to Breaky, Cadman and Sampford (2015, 3), Sampford started to distinguish between institutional and individual integrity. Since then, Hoekstra and Kaptein are the leading experts in the field of institutionalizing (public service) ethics. Anechiarico and Segal defined ethics management as administrative mechanisms that are used by

organizations to ensure appropriate workplace conduct (Anecharico & Segal, 2020, 83) Also related to the issue of institutional integrity, Cropanzano and Folger (1991) were the first to invent the term of organizational justice and Linda Trevino the concepts of unethical behavior in the workplace and ethical culture (Trevino 1986). In the private sector, the concept of managerial ethics was founded by Schminke (1998). The notion of integrity systems seems to originate in the works by Jeremy Pope, the founder of Transparency International (Pope, 1996). Other concepts discuss organizational ethics integrity (Polowczk, 2017) or ethics infrastructure concepts (such as those published by the OECD, 2020). As regards the latter, the most important distinction between integrity systems and ethics infrastructures seems to be that the former is a more technical concept and the latter relies on a discussion of much broader variables such as the importance of the rule of law, democracy and the judiciary.

According to Huberts (2014), possible elements of an integrity system are rules, disciplinary policies, standards, codes of ethics, codes of standards, value management, ethical leadership, whistleblowing, job rotation, risk analysis, training, integrity plans, integrity monitoring, scandal management, monitoring capacity, registers, disclosure policies, ethical climate surveys, self-assessments, integrity officers, (independent and powerful) ethics committees, clear accountability mechanisms, willingness to enforce, openness and good working conditions. The combination and precise configuration of these elements or instruments can be endless and differs from organization to organization and from policy to policy.

Thus, proponents of integrity management rightly claim that institutions can enhance individual- and organizational performance, promote honor, respect, compassion, mindfulness, tolerance and anti-discrimination. However, as we have seen, unfortunately, institutions can also act exactly into the opposite direction (Ortman, 2010): They can promote and support unethical conduct, suppress morality, overstretch it, deviate and transgress from accepted norms and commit employees to unethical acts. It is also still unclear whether any integrity strategy (for example, compliance- based

versus value based) or any form of integrity management has become more effective than another. In the meantime, also so-called “value-based” countries wonder why their systems did not produce the desired (superior) results. Despite being an international forerunner in the field of (institutional) integrity, the Netherlands focuses strongly on economic values, financial constraints and saving measures which have a negative impact on integrity policies. In 2021, in its fifth evaluation round, the Council of Europe (GRECO) issued a sharp report and recommended the Netherlands to more effectively regulate, monitor and enforce conflicts of interest policies (GRECO, 2021). This recommendation could have also been interpreted as an advice to focus not only on value-based policies. This also explains why ethics policies and management in a “forerunner” country like in The Netherlands are not more effective than integrity policies and integrity management in a traditional, compliance based like in Germany.

Here, only one explanatory variable is that – while the Netherlands invest much more resources in awareness raising, the monitoring of integrity policies, value-based instruments and ethical leadership - German civil servants have a high public service motivation (which is positively co-related to ethical behavior (Meyer-Sahling, Mikkelsen & Schuster, 2019) and believe in the importance and effectiveness of rules (which matches with the existence of a rule-based system). Moreover, value-based countries trust in soft-approaches and codes and even in situations (such as in the case of side-activities and post-employment activities) when it would have been wiser to monitor and sanction misconduct through legally binding rules. These differences show that, in most countries, the effectiveness of any particular institutional integrity system is determined by the degree of consistency amongst its constituent elements and the way they fit into the specific culture, organization, climate and leadership styles.

In many countries, the focus of attention is still on legal- and institutional effectiveness, because the regulatory landscape is highly fragmented. Many countries do not have a consolidated version of all existing rules in place. As regards institutional effectiveness, various bodies are responsible for the

monitoring of ethics policies such as various ethics commissions, ethics inspectorates, ethics commissioners, integrity officers, HR departments, audit bodies and ombudspersons. Similar to the field of ethics regulation, new institutional challenges concern the growing institutional fragmentation, enhanced coordination challenges and (in-) effectiveness of anti-corruption bodies (Schuette et al, 2023).

As regards policy- and organizational effectiveness, integrity policies are rarely adopted as a consequence of evidence-based learning but as reactions to mediated political scandals. Today, mediated scandals have become a standard feature, even as regards minor issues. Take only the case of a Finnish newspaper, *Iltalehti*, which reported about videos posted on social media about the Finnish prime minister dancing and partying (which then caused media criticism about a potential drug abuse by the Prime Minister and the prime minister lacking work ethics, see Politico on 18 August 2022). As this case shows, compared with earlier times, there has been an exponential rise in the number of scandals. At the same time, "scandal fatigue" is also rising. Overall, the issue at the heart of the debate is not whether there is too little, too much or just the right amount of ethics. Instead, new discourses focus on the question of whether some policies and instruments are effective and what kind of institutionalization of ethics regimes is needed. At present, no administration is equipped with the necessary resources, tools and skills to monitor conduct effectively. Whereas implementation requirements are constantly rising, countries invest heavily in managing ethics policies. But it is never enough. At the same time, there is no consensus regarding the mechanism by which instruments and management approaches might impact on output and outcomes. Moreover, only rarely, politicians engage in discussions about the capacity limits of administrations and how they can keep pace with growing (regulatory) implementation requirements. Overall, there is growing insecurity about the right regulatory mix, the role of self-regulation, the effectiveness of deterrence mechanisms and sanctions, the quality of regulation and the need for other political, behavioral and economical

instruments. This situatedness immediately also raises the deep question of the limits of the law and traditional compliance-based approaches (Demmke et al., 2021b).

On the other hand, ethics policies can also be characterized as self-reinforcing processes that are highly change resistant and continue to follow the logic of ever more and ever stricter laws (Saint-Martin & Thompson, 2006, 17). Change resistant means that it is simply impossible to call for a deregulation of ethics policies in certain areas, or – sometimes – even to criticize the ineffectiveness of chosen approaches. The popular narrative is still: More, better, deeper, stricter, wider – is the way to go. Until today, countries rarely apply (regulatory – or cost-benefit) impact assessments in the field of ethics policies.

Because of the focus on rules, ethics management concepts and instruments also concentrate on intentional causes of unethical behavior. They are not designed to unintentional causes of unethical behavior. On the other hand, as already discussed, ethics management is mostly dealing with individual causes and less with organizational causes for wrongdoing.

As regards enforcement effectiveness, frequently, administrations shy away from enforcing the existing policies and rules against top-officials and ministers. Often, administrations are highly tolerant in the enforcement process (Demmke et al. 2021b).

All of these shortcomings explain the frustrated conclusions of experts like of Johnston and Fritzen (2021): “We know far more about the issue than we did 30 years ago, and we have a network of policies, organizations, and researchers on a scale, and level of sophistication, few could have imagined in earlier days [...]. Unfortunately, ... few would argue we have decisively turned the tide” (Johnston & Fritzen 2021, 5). The boundaries between growing expectations and daily, grandiose ethical failure are thin. As it seems, organizations can never function ethically if the governance context pursues other (utilitarian) goals and conflicting objectives. At the end, organizations can only be as ethical as the external (governance) and internal (management) context. Integrity requirements

have less integrative power if the subsystems of society, meaning: Business, Politics, Law, Science, Organization and Culture move into opposite directions! Overall, it is naive to think that ethics management pays any time and, in any place, and once it is implemented. As such, creating and maintaining conditions favorable to this alignment is a difficult and never-ending task. The best to be expected is a temporary and imperfect equilibrium (Paine, 2000).

Thus, it is only on the surface that the ethics management is gaining importance as basis for reasoning and justification. At a deeper level, however, it is being undermined, if ethics are implemented for mainly utilitarian reasons and conceived only as a tool that serves other imperatives and objectives. While a realistic understanding of the relations between ethics and economy is essential, the subordination of ethics to economics is – at times - worrisome (Paine, 2000). Take the case of ethics management in the private sector: On the one hand, an increasing number of corporations are taking over public morality and claiming to defend sustainability. On the other hand, “they engage in elaborate practices of tax avoidance and even illegal tax evasion. They bend and break laws, or pressurize politicians to change the rules for their commercial advantage...they pay workers as little as possible, lobbying against fair wages...On top of all of this, these same corporations can promote themselves as “purpose driven”, “socially responsible” “stakeholder driven and even “ethical” (Rhodes, 2021, 15). Overall, ethical “wokeness” is very situational and selective.

5. The management of an emerging ethics bureaucracy

In all countries worldwide, trends are towards a) the adoption of more ethics rules and standards in different institutions and for different categories of staff/holders of public office etc., b) an “ethicalization of rules” (more laws, rules and standards in various policy fields include references to ethics and ethical standards), c) broader applicability of ethical definitions (e.g. the term spouse) and d) the setting of stricter standards (Demmke et al. 2021b).

Despite these trends, countries and organizations rarely evaluate integrity policies. Mostly, organizations do not discuss whether there is too little, too much or just the right amount of ethics. Or, whether some policies and instruments are more effective in one policy field and less effective in another. An OECD study (2022) also shows that, at present, almost no OECD country is equipped with the necessary resources to effectively manage and monitor ethics policies. Existing data are scarce, especially in the field of conflicts of interest (OECD, 2023). “In only four countries action plans include estimates for capital and operational expenditures” (OECD, 2022, 17). Thus, whereas countries invest heavily in setting stricter standards and adopting new rules and policies, they neglect that implementation requirements are also constantly rising.

Parallel to this trend, countries focus –on individual causes for unethical conduct. This individualized approach is ineffective as long as institutions do not invest ever more resources in the investigations of institutional causes for misconduct. If they do so, the management of ethics requires sophisticated and complex interventions and high expertise of those who are in charge of monitoring the conduct of individuals. However, overall, individualized monitoring is difficult, complex, time-consuming and increasingly costly. This all together can easily lead to an ethics- and control bureaucracy, which, however, remains relatively ineffective because detecting, managing and measuring ethics policies involve some of the greatest challenges and difficulties in legal, political-, organizational- behavioral and administrative sciences.

In fact, the downsides of ethics bureaucracies are well known and discussed under the label of integrity paradoxes: The more countries invest in the implementation and institutionalizing of integrity policies, the more resources are needed for the management of these policies and the coordination of (ever new) ethics bodies. In these situations, more personal and more resources are needed in the monitoring and the enforcement process. However, if the trend towards more and stricter ethical requirements is not followed up by the allocation of more (personal) resources, this increases the likelihood for new shortcomings in the implementation process. Then, the new circle

starts, again: Politicians and media will call for stricter policies, rules and, hence, the need for more investments in an integrity bureaucracy.

6. Managing the anti-discrimination and diversity bureaucracy

As discussed, the era in which bureaucratic obedience, hierarchical decision-making and treating all persons in the same way meant treating everybody fairly, is not anymore, the paradigm of our times (Menzel 2011). “The age of standardization and the decline of patronage government were well suited for the belief in and practice that equal treatment for all is fair treatment. However, postmodern societies along with ethnic, racial, gender, and age diversity have challenged elected officials and administrators around the world to rethink how to treat people unequally and yet to be fair” (Menzel 2011, 122). Therefore, a new challenge is to design fair organizational stems under individualized conditions that still can be combined with the legalistic nature of organizations and avoids trends towards the personalization of management and law (Ben-Shahar & Porat, 2021; Demmke, Autioniemi & Lenner, F. 2021c).

Take the case of anti-discrimination and diversity policies.

Whereas decades ago, the concept of anti-discrimination concerned the discrimination of women, today, the concept has greatly expanded. In the meantime, managing anti-discrimination (and diversity) is as important as it is difficult. Should governments establish a relationship between different forms of discrimination? Do some forms exist that are more important than others? Is social discrimination (and social inequality) more accepted than age related discrimination?

First, because of the expansion of the concept of diversity and anti-discrimination (which covers gender, race, many forms of sexual orientation, nationality, disability and age-related forms of discrimination), public administrations also need to manage many more policies and cases, because they are considered as potentially discriminatory. On the other hand, characteristics that would once

have labeled public officials as ‘corrupted’ (Buchan & Hill, 2014) such as homosexuality or atheism, are nowadays – usually – no longer taken as signs of someone’s lack of integrity” (Kerkhoff & Overeem, 2021). The case shows that, overall, the concept of integrity is a rather fluid and flexible concept. Behavior that was once unacceptable becomes acceptable.

Second, because discrimination is not always the result of intended, structural and institutional forms of discrimination. Instead, it extends into many forms of discrimination as a result of unintended bias, for example leading to discrimination in pay, promotion, recruitment etc. policies. The real challenge is then to overcome unintended bias as regards an increasing number of groups/identities that claim to be discriminated (Nordell, 2021).

Third, because the concept is becoming overly complex and requires a re-consideration of the concept of “equality”: As such, all people should be treated equally and not being discriminated because of race, age, disability, sexual orientation, gender etc. At the same time, (structural) discrimination requires interventions in order to protect, offer equal opportunities and support disadvantaged groups and identities etc. Like this, diversity becomes a precondition for equality: "A common world disappears when it is only seen from one aspect; it only exists in the multiplicity of its perspectives” (Arendt, 2010, 73). However, measures to do so may take forms that are in conflict with the principle of equality and merit. Moreover, managing equality can become overly in certain cases, or policies: Take the case of age-related discrimination: Nowadays, almost every age cohort rightly reports experiencing different forms of unfair treatment because of their age. Like this, it is difficult to define equality in a context where everybody feels discriminated against everybody.

Fourth: The concept of anti-discrimination is heavily politicized and this (negatively) impacts on the management of anti-discrimination. More concretely: Whereas the focus of attention is on racism, gender- and sexual discrimination, discrimination because of disability and sickness is somewhat neglected. In fact, for example in Germany (Antidiskriminierungsstelle, 2022), reported cases of discrimination in the field of disability and sickness almost rank as high as cases of racism. In the

field of disability and sickness, many more cases (up to ten times more) are reported than in fields like discrimination because of religious belief, sexual orientation, or age-related discrimination. Overall, the number of reported anti-discrimination cases is increasing. Obviously, there is a trend towards the perception of ever more and individualized experiences of discrimination. On the other hand, more people are courageous and report cases of discrimination.

Thus, the changing concepts of anti-discrimination and diversity policies and the development of (reported cases) of discrimination may threaten the capacities and cohesion of human resource management policies (Fukuyama, 2022, 47, 63). And, yet, it will become ever more difficult to draw a clear line where discriminatory behavior starts and where it ends. In the meantime, forms of discrimination are everywhere and appear anytime, especially in the field of age-related discrimination, as already mentioned. The increasing number of discriminations against ethnic minorities is also a tremendous challenge. However, it can also be explained by the tremendous change of societies. This should not be interpreted as a plea for relativizing democracy, the rule of law, liberalism and discrimination.

One important cornerstone of democratic and liberal societies is the concept of individual autonomy, combined with tolerance, individual recognition and the ability to make choices which regard to speech, association, belief and sexual orientation. Critics of modern democracies and supporters of so-called illiberal democracies claim that current societal trends are towards too much autonomy, diversity and individualization. Overall, individual autonomy and identity thinking are carried to an extreme and being absolutized (Fukuyama, 2022, 47). These trends may destroy the social cohesion within western societies. Therefore, supporters of illiberalism plea for restricting diversity and pluralism (Deneen, 2018). According to Mounk “never in history has a democracy succeeded in being both diverse and equal, treating members of many different ethnic or religious groups fairly. And yet achieving that goal is now central to the democratic project in countries around the world” (Mounk, 2022).

While claims that countries face “too much diversity” threaten the concept of democracy and liberalism, it is true that liberal and democratic societies face huge challenges when managing increasing diversity and individualization as a consequence of changing concepts of citizenship (Kochenov, 2018), migration and labor mobility. For example, in the European Union, the number of non-EU people acquiring citizenship is constantly increasing (EUROSTAT, 2021). Also, the number of people living with a foreign background is going up. Overall, ethnic diversity is increasing.

Also, membership in churches and religious belief is changing. In most liberal and democratic societies, all people are entitled to choose their own religion, which means that frequently, more than twenty religions are tolerated and accepted within one country (such as in Finland). Overall, trends and attitudes as regards religious belief and attitudes confirm that people become more autonomous in adopting and practicing religious belief. In fact, differentiation and diversity of (non-) religious affiliation and belief is increasing.

Finally, the broadening of the concept of anti-discrimination and inclusion causes entirely new management challenges. While, in recent decades, legislative developments, case law and policy initiatives have improved many people’s lives and helped building more equal and welcoming societies, including for lesbian, gay, bisexual, trans, non-binary, intersex and queer (LGBTIQ) people, greater social acceptance and support for equal rights has not always translated into clear improvements in LGBTIQ people’s lives. In a 2020 survey, the European Union Agency for Fundamental Rights (FRA) found that discrimination on grounds of sexual orientation, gender identity/expression and sex characteristics was actually increasing in the EU (European Commission, 2020, 2 and 3). Thus, the legal, political and cultural context is not necessarily translated into concrete managerial and organizational practices. Also, in daily life, “many people are now deeply pessimistic that different groups might be able to integrate in harmony, celebrating their differences without essentializing them” (Mounk, 2022).

So far, trends towards increasing diversity of populations are mirrored by increasing standardization and individualization of national (public) management and HR practices. These concern the DE standardization and flexibilization of pay-, working time-, pension-, recruitment, training and career development policies etc. (Demmke, 2019). All of these developments are supposed to create new opportunities, but they also generate new challenges. In times of increasing delegation of HR-responsibilities to line-managers, the decisions of superiors change, shape, direct, and alter employees' lives. Research in the field of organizational justice has found that each decision by leaders is strongly related to employee outcomes. Still, there is very little evidence on how trends towards more diversity are managed by leaders in times of more organizational de-standardization and responsabilization and how these influence perceptions of organizational justice. In the field of research, this is a "black box" (Demmke, 2020). So far, managerial challenges are underestimated in times of increased autonomy, diversity and pluralism. Therefore, a new challenge is to design fair and rule-based organizational systems under individualized conditions that avoid trends towards biased treatment of employees (Ben-Shahar & Porat, 2021). Even in good governance countries, discrimination is – often – not the result of intended behavior, and done by bad people. Rather, it is the result of unintended behavior that results in unfair treatment of groups as regards the recruitment, promotion, pay and career development of people. Overall, concepts of organizational justice are applied differently to different groups. This can be the result of unintentional bias. Thus, liberal democracies must be equipped with the right tools, instruments and behavioral set and prove that the management of diversity and autonomy are alive and doing well. For doing so, they should be more interested how to overcome bias in order to manage increasing diversity. New research has started how to overcome fatalism and the belief that "bias" cannot be changed (Nordell, 2021).

7. The case of managing conflicts of interests in times of individualization

Kaptein (2022) suggests that safeguarding the ethics of an organization may become paradoxical and more difficult if an organization becomes more effective. The higher the ethical expectations, the more standards are set higher, again (Kaptein, 2022). “For example, when an organization has successfully implemented the norms for its employees regarding insider trading, it is then expected that it also defines and implements them for the family members of its employees” (Kaptein, 2022). In fact, during the past years, countries have started to introduce ever more detailed disclosure requirements for holders of public office (Rossi, 2017, 23). Often, the sheer number of ever new individual disclosure requirements exceeds the capacities of the administration (Ben-Shahar/Schneider, 2014). “In other words, if a financial disclosure agency has two dedicated staff members, and the law defines one million filers, will two people and their available resources be enough to support the filers, receive the disclosures, screen the disclosures, provide access, exchange information with other agencies, detect irregularities, and carry out any other activities that the law may mandate? Probably not” (Rossi, 2017, 24). Today, requirements to disclose non-financial interests arising from personal friendships and family relationships are the most difficult issues to monitor and enforce (Rodwin, 2018). Also, concepts of immediate family or spouse are constantly evolving. Thus, apart from the concept of ‘immediate family’, the changing concepts of close friendships, extended family, etc. also increase the potential list of potential conflict of interests that need to be monitored by those officials who are charged with these tasks.

These cases illustrate the “bureaucratization” of ethics policies and the paradoxes in the field of ethics management (Anechiarico & Jabobs, 1996; Thompson, 1992; Stark, 2000; Behncke, 2005; Nieuwenburg, 2007). Setting stricter ethical standards necessarily requires the need to professionalize and institutionalize integrity systems. This, in turn, requires constant (and increasing) investments in monitoring and enforcement capacities. However, the stricter the monitoring requirements, the more likely will be that shortcomings in the implementation and enforcement will be discovered. In case, this leads to ethical scandals, the media and politicians will ask for more and tougher professional

integrity policies. Following this, stricter standards, more rules, policies and new ethics bodies will be introduced and, again, more shortcomings in the implementation of policies will be detected, leading to ever more calls for more and better ethics bureaucracies.

Thus, the broader the conflicts of interest's concepts, the more these concepts are amorphous, which reduces their usefulness. If ever more conflicting interests are included within the definition of conflicts of interest then the whole concept of interest will become just another phrase for bias. The present situation is a dilemma: Whereas a narrow definition of conflicts of interest may exclude from scrutiny a large bulk of conflicting situations which may lead to a conflict of interest, a too-broad definition leads "to finding conflicts of interest everywhere in social life" (Peters & Handschin, 2012, 6).

8. Conclusions

Today, ethics policies and ethics management are expanding and becoming more personalized. Because of all of these trends, integrity policies are ever more difficult to manage and to monitor. Especially, the current individualized approach towards questionable behavior, the so-called "bad apples" approach, makes that the management and institutionalizing of ethics policies increasingly bureaucratic, complicated, expensive, hard to manage, to monitor, and to enforce. To conclude: Integrity management becomes ever more bureaucratized, institutionalized and professionalized, but not necessarily coming closer to its objectives – integer organizations and people. Therefore, trying to be ethical in every sense of the word, could mean that public organizations and their leaders end up pleasing no one. Our discussion is a plea to address these new challenges.

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