

EXPLORING LOCAL INTEGRITY MANAGEMENT IN THE VALENCIAN COMMUNITY: A MIXED-METHODS STUDY*

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Abstract

This article focuses on a pilot study of integrity management systems in the Spanish regional state of Valencia. The Valencian Community was a relevant case because it was one of the *foci* of corruption in Spain during the first two decades of the 2000s. The results were obtained from 65 valid responses to a survey of municipal political and administrative officials. The results were processed using MAXQDA2024 software. An analysis of the main views expressed and the policies adopted led to the grouping of cases into four clusters (obtained using the Jaccard similarity index). Municipalities were ranked based on the development of policies and visions regarding integrity. The main findings are that there is an increasing appreciation of integrity management policies, and that legislation is the predominant shaping element. Some of the informants highlight these policies in changing organizational culture and increasing professionalism. The size of municipalities and whether applications were made for European funding were found to be highly influential factors in the development of public integrity policies. This study confirms the relationship between policy development and the implementation of legislative measures. This could also help to study integrity policies in local governments in future studies.

Keywords: public policy, local government, anti-corruption, integrity management, institutional performance.

1. Introduction

This article examines the main policies adopted by 65 Valencian town and city councils during the period 2015-2023. It is based on the results obtained in a telephone survey carried out from November 1, 2023 to March 31, 2024.

The importance of this study is justified by the role that corruption has played in recent years as a destabilizing element in liberal democracies (Mény, 2020). To generate legitimacy, public authorities have implemented measures to mitigate corruption in the public sphere (Suchman, 1995; Villoria, 2021a). Although corruption is a recurrent theme in social science literature, its study presents difficulties (Villoria and Jiménez, 2012). Consequently, some authors have decided to focus on the reverse side of this concept – namely, integrity (Huberts, 2014; Lawton, Van Der Wal and Huberts, 2015).

There are few studies of integrity policies at the local level in Spain, as most of the related works have focused on corruption (for example: Garcia-Quesada and Jiménez, 2017; Jiménez, Villoria and García-Quesada, 2012; and Parrado, Dahlström and Lapuente, 2018). In the international literature, there are a variety of systematized studies focusing on local institutions (Ackim, Rugeiyamu and Msendo, 2024; Baljija and Rustemi, 2021; Huberts, Anechiarico and Six, 2008; Perlman, Reddick and Demir, 2023).

The research question posed in this article is as follows: how and why are integrity management policies configured at the local level in Valencia? This question is answered through the generation of study categories of integrity management systems. The local level of the Valencian Community has been studied because it was affected by corruption cases in the first decades of the 21st century. Moreover, progress in the position of the European Quality of Government Index has been remarkable over the last ten years (Megias *et al.*, 2024).

2. Theoretical framework

2.1. *Isomorphism*

Several authors have highlighted the importance of the environment as an element that affects institutions and the adoption of innovations to improve legitimacy (Meyer and Rowan, 1977). DiMaggio and Powell (1983) determined that there is a series of macro-processes produced by coercion, professional practices (normative), or mimicry that generate modifications in the organization. These three types of isomorphism have been present in the changes in the modernization of the local level, with coercive isomorphism standing out above other types (Tolbert and Zucker, 1983). Likewise, dynamics are generated in which the characteristics of the organization itself are combined with the new innovations that occur over time (Tolbert and Zucker, 1996). The institutionalization of integrity measures in Spain and their construction at the local level have been spreading as regulations have been passed, which, in turn, were shaped by the EU (Jiménez Asensio, 2017). Hence, shaping the legal framework on which integrity policies have been built varies according to

the approval of new regulations. Thus, Law no. 19/2013 on transparency, access to public information, and good governance (*Ley de Transparencia*), for example, has been very important in shaping policies at the local level.

The literature on transparency and good governance highlights the importance of regulations in implementing such measures. Coercive isomorphism is a crucial driver of the adoption of administrative modernization measures that transcend path dependence dynamics in Spain (Medir Tejado *et al.*, 2021). Likewise, variability in terms of implementation stands out, and although legislation is a necessary condition for its emergence, other variables also affect the formation of these integrity management systems. According to Villoria (2021b), the literature highlights the need for, among other things, endogenous factors related to organization, the availability of funds, and sufficient trained personnel. Likewise, a push is needed from public authorities and public employees in charge (Medir Tejado *et al.*, 2021).

Proposition 1: Legislation alone does not seem to be sufficient to explain the widespread implementation of the integrity management system; thus, the vision of public officials tends to better explain its scope and formulation than legislation.

2.2. A preliminary definition of integrity

Integrity is defined as the other side of the corruption coin. Both antagonistic concepts have evolved in parallel (Huberts, 2014). The term corruption was originally associated with a lack of virtue. However, during the French Revolution, this was associated with the reason. Today, corruption can be defined as the abuse of public power to promote private interest (Engels, 2019). This can be explained through individual (Avolio and Gardner, 2005; Heidenheimer, 2002), institutional (Acemoglu and Robinson, 2014; Dahlstrom and Lapuente, 2018; Della Porta and Vanucci, 1997; Parrado, Dahlström and Lapuente, 2018), and cultural approaches (Arellano-Gault and Lepore, 2011; De Sousa, 2008; Inglehart and Welzel, 2006), as well as from socio-economic and structural perspectives (Rothstein, 2011).

Public integrity can be seen from various perspectives: individual, social, and institutional. Some authors focus on the morality of the individual and what they define in terms of right and wrong in relation to public management and decision-making (Plant, 2018; van Steden, 2020). Social conceptualizations are more global in character and based on values shared by society. Hence, there are authors who refer to the idea of the common good (Bhuiyan, 2011) or emphasize the general interest (Demmke, 2020). This understanding of integrity is related to the prevailing culture in a particular social system, which determines what is perceived as appropriate. Such a conceptualization considers the norms applied in a political community and is also based on informal and cultural rules (Arellano Gault, 2017).

In addition, it can be seen how values change over time and affect public institutions differently. Elements such as social responsibility and the environment are recurrent values (Jørgensen and Bozeman, 2007).

From an institutional perspective, closely linked to the classical view of bureaucracy, integrity can be defined in terms of compliance with legality, neutrality, and administrative efficiency (Bozeman, 2009). This argument is based on minimizing the arbitrary power of public employees (Herzfeld, 2002; Papadopoulos, 1997; Seibel, 2020). The new public management (NPM) approach reflects a change in values, with efficiency added above other concepts. Thus, with the emergence of concepts such as managerialism, performance management, quality, privatization, or outsourcing, the instruments of Weberian control are dissolved and replaced by other instruments such as audits, evaluations, and management by objectives. However, the opening of key managerial positions was also advocated in favor of this efficiency (Menzel, 2015). From this perspective, these key positions in the organization were to foster ethical leadership by improving efficiency through the entrepreneur's figure or the generation of public value (Moore, 1998; Osborne and Gaebler, 1994).

In short, this article uses the term public integrity from a triple meaning: (1) a cluster virtue instilled in the individual that serves to overcome his possible moral deviations (Villoria, 2021a), (2) individual action that conforms to social and cultural conventions (Huberts, 2014), and (3) the quality of public institutions that aligns the action of institutions to prioritize public interests (OCDE, 2017).

Proposition 2: The perception of integrity management policies is related to the breadth and level of Local Integrity System (LIS) development.

It is understood that there will be several types of views. First, those who understand that integrity is transformative and generates improvement in the organization, human resources, and procedures within the institution. These views will be justified by arguments related to professionalization, cultural change, and general interest. Second, there are other types of managers who use integrity measures to obtain more resources; therefore, their arguments are efficiency-based. Third, there are those who only comply with the legal minimum to avoid punishment and who only consider a finalist vision of the fight against corruption. Finally, some do not comply with the legal minimum because they do not see a clear benefit.

2.3. Integrity management systems: definitions and previous work

A local Integrity Management System can be defined as a set of policies and institutions that safeguard the integrity of a government. These focus on preventing corruption and generating ethical practices through value-based or institution-based measures (Huberts, 2014; Huberts, Anechiarico and Six, 2008; Rohr, 2017). The definition is in line with OECD (2020) recommendations in that it understands integrity as a coherent set of policies and infrastructures that are organized as a system and that consider the characteristics of the environment and the organization.

The development of different instruments has been established over time. Without wishing to be exhaustive, several related concepts have been used historically by both

international organizations and specialized literature, including organizational integrity systems, integrity management frameworks, ethical infrastructures, pluralistic ethics management frameworks, ethical program models, national integrity systems, and local integrity systems. Although each concept focuses on a set of measures or the place where they are implemented, they have common elements (Huberts, Anechiarico and Six, 2008; Maesschalck, Hoekstra and van Montfort, 2024; Pope, 2000).

Some attempts to operationalize such systems have been varied. For example, Pope (2000) found that the integrity of national integrity systems was based on institutional pillars such as the executive branch, legislature, judiciary, and media. The main idea of this author is that if one of the pillars of the system fails, corruption can cause the system to fail to serve general interests. From a local perspective, authors such as Huberts, Anechiarico and Six (2008) defined local integrity systems as an adaptation of Pope's idea in which close cooperation is needed between the actors in a governance environment.

All the systems mentioned previously were based on value- or institutional-based measures. Value-based measures change individuals' values through non-coercive means that impact their value systems, whereas institutional-based measures focus on institutionalized coercion and impose control. However, the two dimensions work together and interrelate to generate synergies (Huberts, 2014; Rohr, 2017).

Both types of instruments have led to different combinations of integrity-management systems. In conjunction with techniques based on a strategic approach, these have generated models to improve the integrity of public institutions. For example, OECD built a model based on commitment, responsibility, norms, society, leadership, merits and abilities, development of capabilities, openness, risk management, supervision, participation, and punishment. Hoekstra, Huberts and van Montfort (2023) generated an index for assessing local integrity management systems. Their approach identifies seven essential elements: (1) paying attention to integrity policies, (2) operationalization of integrity to measure implementation, (3) ethical leadership, (4) internal consistency, (5) checking whether the measures are comprehensive and measurable, (6) structures related to activities to improve policy outcomes, and (7) evaluation of a critical reflection. Another model to consider is The Public Integrity and Anti-Corruption Plan (PIPAC, for its initials in Spanish), which is an adaptation of the OECD's integrity management model in which the focus is on the definition of integrity, management, monitoring, and the punitive system (De Bona, 2022). Other authors, such as Meza and Pérez-Chiqués (2024), determine the need to shape measures that consider the top-down approach with the bottom-up approach and that, in addition, have an internal or external character.

Finally, Aldeguer-Cerdá, Abellán-López and Pardo-Beneyto, (2020) constructed a classification that was based on the duality between value-based and institution-based arrangements and included coercion and the integrity policy target. This was achieved using a functional classification proposed by Lowi (1972) and adapted to integrity management policies. The idea that some policies affect individual civil servants as well as institutions was also added. Integrity policies can be divided into four types of instruments: (1) ethical

policies, (2) openness policies, (3) deterrence/ empowerment policies, and (4) control policies. This theory enables an understanding of integrity policies and adds depth by going beyond the direct effects on morality and including an institutional component.

2.4. *The development and classification of integrity policies*

According to this classification, integrity management policies can be grouped as follows:

- Ethical policies focus on the individual and exert passive coercion as they seek to change institutional culture by improving personal values. They aim to have a set of principles that prevent behavior that is not aligned with social and institutional norms.
- Openness policies have an impact on the results of the institution’s actions, passively modifying its procedures. The organization is consequently immersed in an environment in which the institution is monitored and observed through the data provided.
- Other types of policies to consider are deterrence and empowerment policies. These are located at the individual level and exert direct coercion on the individual. This coercion can become an incentive and reward, and in some way, the individual’s own characteristics.
- Control policies have an impact on institutions. They are enforced by internal bodies and other independent external control institutions. Such measures create an institutional environment in which the autonomy of the organization is constrained by the actions of these actors.

Table 1 lists the main measures that comprise each type of integrity policy group. These include mandatory measures (in bold) and those voluntarily present in local institutions. The latter are covered by the power of self-organization of local entities in Spain and Valencia (Sosa Wagner and Martín Mateo, 1999). It should also be noted that, in the Spanish system, the population mainly determines the resources available. This autonomy has also led to the uneven development of these policies. Technical reports on whistleblower protection (Tribunal de Cuentas, 2024) and studies on the implementation of transparency highlight the uneven development of Spanish municipalities, even when formally implemented (López-López, González-Quinzán and Mo-Groba, 2021; Valle Escolano, 2021).

Proposition 3a: All other things being equal, the size of municipalities and resources are positively associated with the construction of transformational visions (which impact the organization, processes, positions, etc.), while municipalities with fewer resources tend to articulate more utilitarian, finalistic, or non-compliant visions.

Proposition 3b: The most transformational visions have a variable distribution of instruments that combine ethical, openness, deterrent/ empowering, and control policies. Meanwhile, the most utilitarian visions focus on openness and control. Local governments with fewer resources will try to comply with legal obligations.

Table 1: Generating a classification of integrity policies

Ethical policies	Openness policies
Code of ethics	Actively published information
Ethics-code supporting infrastructure	Right of access to public information
Courses and awareness-raising for public employees	Big Data and open data
Courses and awareness-raising for elected officials	Open agenda
Regulation of gift acceptance policy	Open accounts
	Stakeholders register
	Citizen participation
	Environmental perspective in public procurement
	Social clauses in public procurement contracts
	Whistleblowing channel
Deterrence and empowerment policies	Control policies
Disciplinary code	Conflict of interest test
Performance appraisal: monetary incentives	Internal control
Performance appraisal: non-monetary incentives	External control
Social clauses for the recruitment of staff	Ethical climate survey
Social clauses for obtaining grants	Quality control
	Audits
	Algorithmic controls
	Citizen audit
	Red flags
	Risk management map

Source: The authors

3. Methodology

3.1. Data collection

The expert integrity informants were questioned through a survey on the measures adopted during the 2015–2023 period in their city councils. This period was chosen because regional legislation on transparency was implemented from 2015. The survey asked about measures taken on integrity and was addressed to local councils with a population of more than 5,000. The population of interest was 157 municipalities, and a total of 65 valid responses were obtained (41.4%). The survey was conducted between November 2023 and the end of March 2024. Responses were mostly obtained by telephone, although to increase the number of responses, the questionnaire was also sent to those respondents who requested a printed copy.

Of the 65 participating municipalities, 35 are located in the province of Valencia, 19 in the province of Alicante, and 11 in the province of Castellón. Regarding population size, 18 municipalities have a population between 5,000 and 10,000, 19 between 10,001 and 25,000, and 21 between 25,001 and 50,000 inhabitants. To these must be added four municipalities between 50,001 and 100,000 inhabitants and two municipalities between 200,001 and 500,000. Only one municipality has more than 500,000 inhabitants. The profiles of the survey participants are shown in Figure 1.

Table 2: Survey questions

Classificatory questions
Type of respondent
Municipality
Province
Causes
What is your understanding of public integrity and anti-corruption policies?
What motivates the adoption of these policies?
What issues have affected your institution in implementing integrity management policies?
Types of policies: Which of the following integrity policies are in place in your institution?
Ethical policies
Openness policies
Deterrence/ empowering policies
Control policies
Other
Have you applied for EU funding?
If you have applied for European funds, have you approved an anti-fraud plan?

Source: The authors

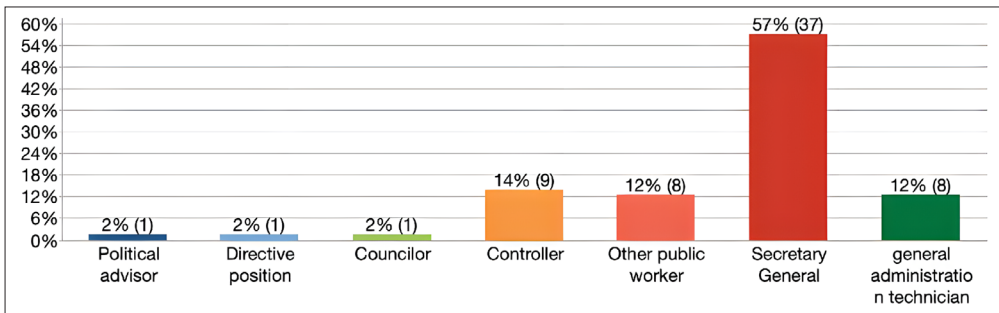


Figure 1: Profile of the survey participants

Source: The authors

3.2. Data processing

The data was processed using mixed methods that combine quantitative and qualitative variables (using the MAXQDA2024 software). The question relating to the understanding and meaning of ethical policies was coded. Literal answers were used for the presentation of results. For the rest of the questionnaire, the answers were pre-treated by converting them into dichotomic variables.

Finally, Jaccard's similarity was used to generate clusters in function to how integrity management systems have developed (based on the perception of these measures and their

development through the adoption of policies). This approach measures similarity by considering the variables and codes that are similar in each document and dividing them by the sum of the similarities and those variables and codes that are either genuine or absent in a document.

4. Results and discussions

To generate the clusters for analysis in the last part of the article, the motivations and visions of the respondents were combined with the type of policy implemented. Each cluster was reinforced with evidence obtained from the survey. Similarly, their conformation is linked to the corresponding theoretical framework.

Table 3: Cluster composition

Number (%)	Cluster 1	Cluster 2	Cluster 3	Cluster 4
General Interest	0(0.0)	0(0.0)	2(16.7)	2(6.9)
Professionalization	2(22.2)	2(13.3)	1(8.3)	10(34.5)
Efficiency	0(0.0)	3(20.0)	6(50.0)	4(13.8)
Legality	1(11.1)	7(46.7)	1(8.3)	11(37.9)
Anticorruption	7(77.8)	4(26.7)	4(33.3)	7(24.1)
Cultural change	0(0.0)	6(40.0)	0(0.0)	9(31.0)
Institutional responsibility	0(0.0)	1(6.7)	0(0.0)	6(20.7)
Others	0(0.0)	0(0.0)	0(0.0)	1(3.4)
Code of ethics	2(22.2)	7(46.7)	5(41.7)	17(58.6)
Deontological code	0(0.0)	1(6.7)	0(0.0)	6(20.7)
Ethics infrastructures (codes)	3(33.3)	4(26.7)	3(25.0)	6(20.7)
Public employees training	0(0.0)	0(0.0)	3(25.0)	18(62.1)
Elected officials training	0(0.0)	4(26.7)	0(0.0)	6(20.7)
Gift policy	1(11.1)	2(13.3)	2(16.7)	5(17.2)
Others	0(0.0)	1(6.7)	1(8.3)	2(6.9)
Proactive disclosure	7(77.8)	14(93.3)	11(91.7)	29(100.0)
Right of access to public information	6(66.7)	12(80.0)	11(91.7)	29(100.0)
Big Data and Open Data	0(0.0)	2(13.3)	0(0.0)	13(44.8)
Published agendas	0(0.0)	4(26.7)	2(16.7)	17(58.6)
Open accounts	0(0.0)	5(33.3)	0(0.0)	20(69.0)
Lobby register	1(11.1)	0(0.0)	1(8.3)	9(31.0)
Citizens' participation	2(22.2)	6(40.0)	2(16.7)	23(79.3)
Environmental perspective in public contracts	1(11.1)	2(13.3)	2(16.7)	11(37.9)
Social clauses in public contracts	1(11.1)	4(26.7)	5(41.7)	19(65.5)
Anti-fraud complaint mailbox	7(77.8)	11(73.3)	12(100.0)	26(89.7)
Disciplinary code	0 (0.0)	0 (0.0)	1(8.3)	5 (17.2)
Performance appraisal: monetary incentives	0 (0.0)	2 (13.3)	1(8.3)	3 (10.3)
Performance appraisal: non-monetary incentives	0(0.0)	2(13.3)	1(8.3)	5(17.2)

continued on next page

punitive, and they use terms such as control, prosecute, or punish in their assessments. Examples of such views include the following:

'Those aimed at denouncing, prosecuting, and improving administrative corruption' [E40].

'Set of actions, strategies, and/or programs designed to prevent, detect, and punish corruption' [E49].

The implementation of integrity management policies is unevenly followed by municipalities in this cluster. Policies are basic and in line with the efforts made since 2013 with the passing of transparency legislation and other regulations.

There is evidence of the monitoring of openness policies such as actively published information, the right to information, and provision for anti-fraud whistle-blowers. Control policies include both internal and external controls but monitoring efforts do not seem to be universal compared to other groups. However, follow-up efforts do not seem to be universal when compared with other clusters. In addition to these policies, there is weak evidence of the implementation of codes of ethics and ethical infrastructures such as red flags, conflict of interest tests (control), and citizen participation (openness).

Given the average number of inhabitants, lack of full implementation may be due to a lack of resources or poor design of municipal organizations. These problems are symptoms of organizations that are not designed correctly, which is consistent with the literature on the importance of having a correct institutional design (see Dahlstrom and Lapuente, 2018; Parrado, Dahlström and Lapuente, 2018). This dysfunctional municipal organization can be explained by two problems related to the lack of efficient structures. First, local governments receive financial resources according to the size of the municipality. This means that its staff and the organizational development of institutions do not allow for the implementation of policies that aim to assume post-material values with guarantees. Consequently, measures that are obligatory under certain regulations have not been generalized in this type of municipalities. Second, there are no effective instruments for controlling the legality at the local level in relation to this type of measure.

4.2. Cluster II. Top-down modernization (low development)

The population of these 15 medium-sized municipalities averages 32,467 inhabitants, with an average deviation of 55,708 inhabitants. Respondents focus on legality and cultural change. Compliance with rules is important as it shapes the ways corruption is understood and prevented at the municipal level.

References to norms determine the importance of the approval of political-administrative programs to bring about changes in the adoption of these policies at the local level. In this sense, E46 states that:

'It is a policy that is being incorporated into all areas of public management, and the first reflections come from the doctrinal sphere, then from the EU, and are gradually being incorporated into the PAs (defense of the general interest, crime prevention, ethical commitments)' [E46].

Another informant affirmed that the policies to be implemented must be adopted, considering what is understood by higher institutions. Thus, E1 states the following:

'Transparency refers to what the law states: Municipal information must be accessible, and we have the responsibility and obligation to be honest in our work [...]' [E1].

On the one hand, they point out that the measures proposed by legislation are not typical of Spanish culture in terms of the fight against corruption:

'Because, in addition to the demand for resources that they do not have, measures such as the complaint channel, I do not think will work for cultural reasons. It is designed for northern [European] countries' [E9].

The second meaning focuses on determining the impact of these measures on the culture of the organization. Hence, we refer to the values:

'Those dedicated to controlling and providing visibility to all internal processes. There are also references to the fight against corruption, efficiency, professionalization, and institutional responsibility' [E44].

These arguments focus on linking corruption to the safeguarding of public resources and are complementary to the previous ones. This is explained by the fact that one of the objectives of the legality to be applied by local institutions is to safeguard public funds.

As in the previous case, internal and external accountability (control policies), as well as actively published information and the public right to information (openness policies), are seen as important. The implementation of an anti-fraud whistleblowing channel is also valued. To a lesser extent, codes of ethics, citizen participation instruments, and staff hiring clauses have been implemented. These medium-sized municipalities face a paradox: the population demands services like larger cities, but they have limited resources. Hence, their visions on this issue are pragmatic and minimalist.

Their visions are municipal and relate the legislative inputs to innovations in their municipalities. They share a vision of corruption related to municipal failures and other cultural aspects. This is consistent with Dahlstrom and Lapuente's (2018) idea that the lack of separation between politics and administration generates distortions. This also agrees with the idea that corruption may be embedded in the social and organizational value systems, as indicated by Arellano Gault (2017) and De Sousa (2008). Such visions consider the role of culture and how it must be modified by adapted measures. In other words, legality is the driving force behind local institutions modifying their Local Integrity Systems (LIS). In the opinion of the informants of this cluster, these measures do not have a formal character but must change the values of the organizations. However, the fact that their instruments are mainly limited to those prescribed by law indicates that without the law, there would probably be no integrity formal policies in these municipalities. This is consistent with other studies, such as those of Tolbert and Zucker (1983) on innovation in local government.

4.3. Cluster III. Efficiency vision (medium development)

The respondents from the 12 municipalities in this group define the struggle against corruption and greater municipal efficiency as important. These municipalities have an average population of 15,517 inhabitants with an average deviation of 8,671 inhabitants. Unlike the members of the previous cluster, their arguments are based on efficiency arguments. One vision that stands out is the diagnosis of accounting control and its problems.

'At the local level, there is a lack of control over the actions of politicians in economic matters, as it is difficult to review economic actions and take responsibility. I consider that there are local politicians who spend time without much control, and that it is slow and complex to audit their activities.' [E27].

Other informants point out, from a systemic perspective, the importance of this measure to improve municipal functioning and increase efficiency to align with the general interest:

'To carry out the best management of public resources in the most efficient and effective way, avoiding duplication, coordinating with other administrations, with the private sector, and with the greatest transparency' [E48].

The fight against corruption is an argument related to safeguarding the public purse and avoiding any type of behavior that goes against the general interest:

'Policies implemented by local governments aim to establish prevention and control mechanisms to ensure that public resources are used efficiently in the general interest of the population and to avoid corrupt practices for private gain' [E25].

The respondents describe as current policies: actively published information, the public right to information, internal and external controls, and the anti-fraud whistleblowing channel. Measures needed to qualify for European funds have also been added, such as conflict-of-interest tests and identification of red flags.

To a lesser extent, codes of ethics, social clauses in procurement contracts, and risk maps are applied. Their vision is pragmatic as mandatory instruments are implemented with the aim of improving economic management or winning EU funds.

Most of the implemented measures are directed at openness and control (given that these are the measures most developed by recent regional and state legislation), and the standard internal and external controls. Their viewpoints are in line with the new public management approach in which value is placed on efficiency and the allocation of funding. This supports the efficiency view of authors such as Huberts, Anechiarico and Six (2008), and Menzel (2015).

The informants' vision is also utilitarian, insofar as they implement this type of policy to gain access to funds. The objective is not to improve the instruments already in place but rather to implement these instruments to obtain funds to increase the budget available for other policies that directly affect citizens. The way the needs are articulated reveals a

structural problem for the Valencian local administrations in terms of competencies and resources, which would be related to a bad design of the institutions, as highlighted by Dahlstrom and Lapuente (2018).

4.4. Cluster IV. Complex model (high development)

Cluster IV consists of 29 municipalities with an average population of 54,331 inhabitants, with an average deviation of 135,371 inhabitants. This population size indicates a high level of organizational development and a considerable capacity to obtain resources. This high level of development is a factor explaining why their perceptions of anti-corruption policies are complex and combine key aspects such as professionalization, legality, cultural change, and municipal accountability.

The views related to compliance with legality point out that:

'The impulse has come above all from the legal obligations, although the financial controller says that she has pulled the cart a lot and the political staff have not pushed... but they have not put obstacles in the way' [E22].

Also, most of the local councils already had some kind of measure in place before the latest regulatory changes:

'The application of legal regulations such as whistleblower protection, PERTES [Strategic Projects for Economic Recovery and Transformation]¹... give rise to a series of obligations. Until this (2020), the public sector had no concrete legislation. Up to that point, in the city council, there were codes of conduct... something like that. But there were no specific compliance departments. From 2020, anti-fraud plans are approved [...]' [E26].

Professionalization is one of the ideas underlying the speeches of the cluster four members. In their view, institutions need to be technified and technocratized. They propose eliminating the role of politicians from areas of management where malpractice or corruption may occur. Most point to procurement as a possible area of malpractice. More technical training for staff is also advocated so that they can defend principles such as integrity, transparency, effectiveness, and efficiency. These measures are also accompanied by a vision of improved advocacy tools that can improve performance. More working protocols and their internalization by public employees can prevent corrupt practices. The following evidence can be found for professionalization:

'Establish mechanisms for avoiding problems, encouraging transparency and equality in administrative procedures (such as selection and procurement), and the absence of conflicts of interest' [E38].

1 PERTES in Spanish. These are public-private projects financed with European Union funds for the development of new strategic sectors in line with Sustainability Development Goals.

In terms of professionalization, the following can be highlighted:

'It is important to professionalize department heads so that they can correctly manage an activity' [E16].

Although professionalization is a value linked to the change in organizational culture, the members of this cluster point out the transformative role of these types of measures:

'Training and prevention are the most important points. Prosecutions are important, but the most crucial point is training (on risky behaviors and so on) so that staff know which behaviors must be avoided. We must work on awareness-raising' [E43].

An interesting aspect of such visions is the reference to the Sustainable Development Goals and their transformative role:

'We must be coherent in our actions and policies in line with the SDGs [Sustainability Development Goals], the Urban Agenda, and the principle of not doing significant harm' [E11].

Other values present in their vision in a less generalized form are those referring to anti-corruption policies themselves, institutional responsibility, efficiency, and general interest. Their vision of these matters is very similar to that of previous ones. However, the difference lies in the fact that they are capable of questioning how public management articulates these aspects:

'[...] I do not know if we are efficient. There are many control bodies and a few management bodies. We do not have the means to do all that we are required to do' [E32].

These types of complex visions also configure management systems with numerous variables. As in the previous cases, most of these systems include mandatory measures such as actively published information and the public right to information (openness policies), internal and external controls, and the creation of anti-fraud whistleblowing channels (control policies).

In addition, other measures have been developed in most, but not all, cases. These measures include ethical codes and training for public employees in ethical policies, as well as the inclusion of open diaries and accounting. Social clauses in procurement are also important deterrence and empowerment policies. There is a significant implementation of audits, the use of red flags, risk maps, and conflict of interest testing.

In general, these are measures based on institutional arrangements that focus on strengthening human capital and decreasing discretion, which aligns with Hoekstra, Huberts and van Montfort (2023) and Villoria (2021a) in terms of institution building and strengthening individual integrity, respectively.

Table 4 summarizes the main characteristics of each cluster. In the policies section, a distinction is made between measures that are mandatory by legislation (in bold) and those that are optional.

Table 4: Summary of cluster characteristics

Classification	Size	Visions	Policies
Cluster I. Minimalist legal adoption (very low development)	small	Corruption	Limited implementation of obligatory instruments: <i>Openness policies</i> - Active publication of information - Right to information - Fraud whistleblower protection <i>Control policies</i> - Internal and external controls
Cluster II. Top-down modernization (low development)	medium	Legality Cultural change	<i>Openness policies</i> - Active publication of information - Right to information - Whistleblowing channel <i>Control policies</i> - Internal and external controls Limited implementation <i>Ethical policies</i> - Codes of ethics <i>Deterrence and empowerment policies</i> - Ethical clauses in staff recruitment
Cluster III. Efficiency vision (medium development)	small-medium	Efficiency Corruption	<i>Openness policies</i> - Active publication of information - Right to information - Whistleblower mailbox <i>Control policies</i> - Internal and external controls - Conflict of interest tests - Risk maps
Cluster IV. Complex model (high development)	big	Complex vision: professionalization, legality, and cultural change	<i>Openness policies</i> - Active publication of information - Right to information - Whistleblower mailbox - Social clauses in public procurement contracts <i>Control policies</i> - Internal and external controls - Conflict of interest tests - Risk maps <i>Ethical policies</i> - Codes of ethics - Courses for public employees - Red flags

Source: The authors

5. Conclusions

This research has studied the main integrity management policies developed during the period 2015–2023 in the Valencia Region of Spain (Comunidad Valenciana). To this end, 65 valid responses to a telephone survey were used, and the results were processed using the MAXQDA 2024 software.

Legislation is an essential element of implementation, but it is not sufficient on its own. In this sense, the role of those responsible helps to understand the broader scope of developing integrity management systems. Thus, professional leadership and vision are essential for policy design. The findings are consistent with Proposition 1.

The perceptions of these officials are not uniform across all municipalities. There is a transformative view of integrity instruments in the organization that goes beyond the obligation to implement this type of policy and corresponds to highly developed municipalities in the region. This profile seeks an organization that functions better and avoids corruption. To achieve this vision, it is important to improve the organization and reinforce professionalism. This type of profile contrasts with a utilitarian one, which seeks to raise funds through the internalization of these types of policies and has an efficiency-oriented discourse; therefore, its development is less than that of the previous group. Thirdly, there are municipalities that only comply with legal obligations, and finally, others that have a simple vision of integrity policies and do not even comply with the minimum measures, which can be attributed to the characteristics of the municipality and the lack of greater awareness of the benefits of integrity. There is a negative cultural view combined with a finalist approach, while in the latter case, it is based solely on the latter perception. Therefore, the differentiation of visions is a fact that confirms Proposition 2.

These visions impact the structure of integrity management systems. Transformational visions (Cluster IV) combine ethical, openness, deterrent/empowering, and control policies more intensively. This is due to the vision of organizational improvement and the people who form it. As for the efficiency-oriented vision (Cluster III), efforts are focused mainly on openness and control policies, which is explained by a vision centered on the organization for the acquisition of resources. The development of municipalities that focus on legal compliance (Cluster II) involves advanced monitoring of policies required by law, but there is limited adoption of ethical policies. Finally, municipalities with limited implementation (Cluster I) adopt policies incompletely, even though they are required to do so by law. This is explained by the vision of those responsible, but also by having limited resources due to their size, which is detectable in clusters I, III, and IV but not in cluster II. Therefore, it can be said, to a limited extent, that resources are also important and influence the scope of integrity management systems. In this sense, it can be said that Propositions 3a and 3b are partially fulfilled.

How can we achieve a greater reach in LIS? The solution to these problems involves implementing different measures. The main one would be to rethink the Spanish local government system and evaluate whether the size of the municipalities and resources are

sufficient at the current stage. However, this is unlikely to occur. Therefore, efforts should be redoubled to provide greater technical and financial support to municipalities that face more difficulties. Multilateral forums, such as federations of municipalities or provinces, should also be used to generate spaces for intermunicipal exchange and cooperation. Another way to address the problem, considering the results, is to make subsidies contingent on the implementation of integrity measures, thereby encouraging investment. Finally, there should be a flexible approach to the adoption of integrity measures that considers the evaluations of the public policies implemented and generates development itineraries to maximize resources and adapt them to the problems.

However, this research has several limitations, such as a lack of data on some of the elements implemented and the investment allocated for this purpose, and on the structures within the municipalities. Another limitation of the research is the type of survey carried out, which can be self-serving, leading to a bias in the justification of the measures and even in the response to the rest of the items. Therefore, future research should extend the data collection to other measures to complete the responses provided. Whether policies remain at the formal level or are useful in preventing corruption should also be examined.

References:

1. Acemoglu, D. and Robinson, J.A., *Por qué fracasan los países* [Why Nations Fail], Bilbao: Deusto, 2014.
2. Ackim, J., Rugeiyamu, R. and Msendo, A., 'Interrogating the Practice of Integrity in Tanzania Public Service', 2024, *International Journal of Public Leadership*, vol. 20, no. 1, pp. 51–75.
3. Aldeguer-Cerdá, B., Abellán-López, M.Á. and Pardo-Beneyto, G., 'Estrategias y arreglos institucionales para la efectividad del buen gobierno. Una aproximación desde la perspectiva del caso español' [Strategies and Institutional Arrangements for Effective Good Governance. An Approach from the Perspective of the Spanish Case], in Hernández-Mendoza, A. and Diego Bautista, O. (eds.), *Elementos para la edificación de un Buen Gobierno* [Elements for Building Good Governance], México: INAP, 2020, pp. 135–158.
4. Arellano Gault, D., 'Corrupción como proceso organizacional: comprendiendo la lógica de la desnormalización de la corrupción' [Corruption as an Organizational Process: Understanding the Logic of the Denormalization of Corruption], 2017, *Contaduría y Administración*, vol. 62, no. 3, pp. 810–826.
5. Arellano-Gault, D. and Lepore, W., 'Transparency Reforms in the Public Sector: Beyond the New Economics of Organization', 2011, *Organization Studies*, vol. 32, no. 8, pp. 1029–1050.
6. Avolio, B.J. and Gardner, W.L., 'Authentic Leadership Development: Getting to the Root of Positive Forms of Leadership', 2005, *Leadership Quarterly*, vol. 16, no. 3, pp. 315–338.
7. Baljija, S.K. and Rustemi, A., 'Measuring Whistleblowing Perceptions among the Civil Service of the Republic of Kosovo', 2021, *NISPAcce Journal of Public Administration and Policy*, vol. 14, no. 2, pp. 135–159.
8. Bhuiyan, S.H., 'Modernizing Bangladesh Public Administration through e-Governance: Benefits and Challenges', 2011, *Government Information Quarterly*, vol. 28, no. 1, pp. 54–65.

9. Bozeman, B., *Public Values and Public Interest: Counterbalancing Economic Individualism*, Washington: Georgetown University Press, 2009.
10. Dahlstrom, C. and Lapuente, V., *Organizando el Leviatán: Por qué el equilibrio entre políticos y burócratas mejora los gobiernos* [Organizing Leviathan: Politicians, Bureaucrats, and the Making of Good Government], Bilbao: Deusto, 2018.
11. De Bona, R.S., 'Evaluación de Políticas de Integridad Pública y Anticorrupción: Los Desafíos de una Iniciativa Nacional para Gobiernos Locales en Brasil' [Evaluation of Public Integrity and Anti-corruption's Policies: The Challenges of a National Initiative for Locals Governments in Brazil], 2022, *Administração Pública e Gestão Social*, vol. 14, no. 4.
12. de Sousa, L., 'I Don't Bribe, I Just Pull Strings: Assessing the Fluidity of Social Representations of Corruption in Portuguese Society', 2008, *Perspectives on European Politics and Society*, vol. 9, no. 1, pp. 8–23.
13. della Porta, D. and Vanucci, A., 'The "Perverse Effects" of Political Corruption', 1997, *Political Studies*, vol. 45, pp. 516–538.
14. Demmke, C., 'Public Administration Reform over Time – Did Change Lead to a More Effective Integrity Management?', 2020, *Central European Public Administration Review*, vol. 18, no. 2, pp. 7–27.
15. DiMaggio, P.J. and Powell, W.W., 'The Iron Cage Revisited: Institutional Isomorphism and Collective Rationality in Organizational Fields', 1983, *American Sociological Review*, vol. 48, no. 2, pp. 147–160.
16. Engels, J.I., 'La nueva historia de la corrupción' [The New History of Corruption], 2019, *Ayer*, vol. 115, no. 3, pp. 23–49.
17. García-Quesada, M. and Jiménez, F., 'Corrupt Cities: The Illicit in Local Urban Development: The Spanish Case', in Chiodelli, F., Hal, T., Hudson, R. and Moroni, S. (eds.), *The Illicit and Illegal in Regional and Urban Governance and Development*, Abingdon: Routledge, 2017, pp. 221–237.
18. Heidenheimer, A., 'Perspectives on the Perception of Corruption', in Heidenheimer, A. and Johnston, M. (eds.), *Political Corruption: Concepts and Contexts*, New Brunswick: Transaction Publishers, 2002, pp. 141–155.
19. Herzfeld, M., *The Social Production of Indifference: Exploring the Symbolic Roots of Western Bureaucracy*, Chicago: Chicago University Press, 2002.
20. Hoekstra, A., Huberts, L. and van Montfort, A., 'Content and Design of Integrity Systems: Evaluating Integrity Systems in Local Government', 2023, *Public Integrity*, vol. 25, no. 2, pp. 137–149.
21. Huberts, L., Anechiarico, F. and Six, F., *Local Integrity Systems: World Cities Fighting Corruption and Safeguarding Integrity*, The Hague: Eleven International Publishing, 2008.
22. Huberts, L., *The Integrity of Governance: What It Is, What We Know, What Is Done, and Where to Go*, Brussels: IIAS – International Institute of Administrative Sciences, 2014.
23. Inglehart, R. and Welzel, C., *Modernización, Cambio Cultural Y Democracia: La Secuencia Del Desarrollo Humano* [Modernization, Cultural Change, and Democracy: The Human Development Sequence], Madrid: Centro de Investigaciones Sociológicas (CIS), 2006.
24. Jiménez Asensio, R., *Cómo prevenir la corrupción: integridad y transparencia* [How to Prevent Corruption: Integrity and Transparency], Madrid: La Catarata, 2017.

25. Jiménez, F., Villoria, M. and García-Quesada, M.G., ‘Badly Designed Institutions, Informal Rules and Perverse Incentives: Local Government Corruption in Spain’, 2012, *Lex Localis*, vol. 10, no. 4, pp. 363–381.
26. Jørgensen, T.B. and Bozeman, B., ‘Public Values. An Inventory’, 2007, *Administration and Society*, vol. 39, no. 3, pp. 354–381.
27. Lawton, A., Van Der Wal, Z. and Huberts, L., *Ethics in Public Policy and Management: A Global Research Companion*, Abingdon: Routledge, 2015.
28. López-López, P.C., González-Quinzán, S. and Mo-Groba, D., ‘La transparencia en los ayuntamientos españoles: Un caso de débil institucionalización’ [Transparency in Spanish City Councils: A Case of Weak Institutionalization], 2021, *Revista Española de la Transparencia*, no. 12, pp. 189–212.
29. Lowi, T.J., ‘Four Systems of Policy, Politics, and Choice’, 1972, *Public Administration Review*, vol. 32, no. 4, pp. 298–310.
30. Maesschalck, J., Hoekstra, A. and van Montfort, A.J.G.M., ‘Integrity Management Systems’, in Kaptein, M. (ed.), *Research Handbook on Organisational Integrity*, Cheltenham: Edward Elgar Publishing, 2024, pp. 542–557.
31. Medir Tejado, L., Pano Puey, E., Vallbé Fernández, J.J. and Magre Ferran, J., ‘La implementación de las políticas de transparencia en los municipios españoles de mayor población: ¿path dependency o shock institucional?’ [The Implementation of Transparency Policies in Most Populated Spanish Municipalities: Path Dependency or Institutional Shock?], 2021, *Gestión y Análisis de Políticas Públicas*, no. 27, pp. 6–29.
32. Megias, A., Maciel, G.G., Jiménez, F. and De Sousa, L., *Informe de investigación: Percepciones comparadas de la corrupción en España y Portugal* [Research Report: Comparative Perceptions of Corruption in Spain and Portugal], València: Agència Valenciana Antifrau, 2024.
33. Mény, Y., *Democracias Imperfeitas. Frustrações Populares e Vagas Populistas* [Imperfect Democracies. Popular Frustrations and Populist Movements], Lisbon: Imprensa de Ciências Sociais, 2020.
34. Menzel, D.C., ‘Research on Ethics and Integrity in Public Administration: Moving Forward, Looking Back’, 2015, *Public Integrity*, vol. 17, no. 4, pp. 343–370.
35. Meyer, J.W. and Rowan, B., ‘Institutionalized Organizations: Formal Structure as Myth and Ceremony’, 1977, *American Journal of Sociology*, vol. 83, no. 2, pp. 340–363.
36. Meza, O. and Pérez-Chiqués, E., ‘The Structure of Systemic Corruption: What Can We Learn from Local Government’, in Meza, O. and Pérez-Chiqués, E. (eds.), *The Structure of Systemic Corruption. How Corruption Consolidates in Local Governments*, Berlin: Springer, 2024, pp. 1–32.
37. Moore, M.H., *Gestión Estratégica y Creación de Valor Público en el Sector Público* [Creating Public Value: Strategic Management in Government], Barcelona: Paidós, 1998.
38. OCDE, *Manual de la OCDE sobre Integridad Pública* [OECD Public Integrity Handbook], Paris: OCDE, 2020.
39. OCDE, *Recomendación del Consejo de la OCDE sobre integridad Pública* [OECD Recommendation of the Council on Public Integrity], Paris: OCDE, 2017.
40. Osborne, D. and Gaebler, T., *Un nuevo modelo de gobierno* [Reinventing Government], México: Ediciones Gernika, 1994.

41. Papadopoulos, D.A., 'Side Effects of Bureaucratic Formalism: Some Administrative Aspects of CAP Implementation in Greece', 1997, *Sociologia Ruralis*, vol. 37, no. 2, pp. 287–301.
42. Parrado, S., Dahlström, C. and Lapuente, V., 'Mayors and Corruption in Spain: Same Rules, Different Outcomes', 2018, *South European Society and Politics*, vol. 23, no. 3, pp. 303–322.
43. Perlman, B.J., Reddick, C. and Demir, T., 'A Compliance – Integrity Framework for Ethics Management: An Empirical Analysis of Local Government Practice', 2023, *Public Administration Review*, vol. 83, no. 4, pp. 823–837.
44. Plant, J.F., 'Responsibility in Public Administration Ethics', 2018, *Public Integrity*, vol. 20, no. 1, pp. 1–13.
45. Pope, J., *Confronting Corruption: The Elements of a National Integrity System*, Berlin: Transparency International, 2000.
46. Rohr, J.A., *Ethics for Bureaucrats: An Essay on Law and Values*, Abingdon: Routledge, 2017.
47. Rothstein, B., *The Quality of Government: Corruption, Social Trust and Inequality in International Perspective*, Chicago: Chicago University Press, 2011.
48. Seibel, W., 'Autonomy, Integrity, and Values in Public Administration: A Dilemma and a Case', 2020, *Perspectives on Public Management and Governance*, vol. 3, no. 2, pp. 155–166.
49. Sosa Wagner, F. and Martín Mateo, R. 'Cincuenta años en la administración local' [Fifty Years in Local Government], 1999, *Revista de Administración Pública*, vol. 150, pp. 285–316.
50. Suchman, M.C., 'Managing Legitimacy: Strategic and Institutional Approaches', 1995, *Academy of Management Review*, vol. 20, no. 3, pp. 571–610.
51. Tolbert, P.S. and Zucker, L.G., 'Institutional Sources of Change in the Formal Structure of Organizations: The Diffusion of Civil Service Reform, 1880-1935', 1983, *Administrative Science Quarterly*, vol. 28, no. 1, pp. 22–39.
52. Tolbert, P.S. and Zucker, L.G., 'The Institutionalization of Institutional Theory', in Clegg, S.R., Hardy, C. and Nord, W.R. (eds.), *The Institutionalization of Institutional Theory*, Thousand Oaks: Sage Publications, 1996, pp. 175–190.
53. Tribunal de Cuentas, *Informe de fiscalización de las medidas implantadas por los municipios con población entre 100.000 y 200.000 habitantes para la protección del informante, ejercicio 2023 (N.º 1.595)* [Audit Report on the Measures Implemented by Municipalities with a Population of Between 100,000 and 200,000 Inhabitants for the Protection of Whistleblowers, Fiscal Year 2023 (No. 1.595)], Madrid: Tribunal de Cuentas, 2024.
54. Valle Escolano, R., 'La eficacia de la normativa sobre transparencia: percepciones de los responsables municipales en España' [The Effectiveness of Transparency Regulations: Perceptions of Municipal Officials in Spain], 2021, *Gestión y Análisis de Políticas Públicas*, no. 27, pp. 30–48.
55. van Steden, R., 'Blind Spots in Public Ethics and Integrity Research: What Public Administration Scholars Can Learn from Aristotle', 2020, *Public Integrity*, vol. 22, no. 3, pp. 236–244.
56. Villoria, M. and Jiménez, F., 'La corrupción en España (2004-2010): Datos, percepción y efectos' [Corruption in Spain (2004-2010): Data, Perception and Consequences], 2012, *Revista Española de Investigaciones Sociológicas*, vol. 138, pp. 109–134.
57. Villoria, M., '¿Qué condiciones favorecen una transparencia pública efectiva?' [What Conditions Favor Effective Public Transparency? A Review Article], 2021b, *Revista de Estudios Políticos*, no. 194, pp. 213–247.
58. Villoria, M., *Ética pública en el siglo XXI* [Public Ethics in the 21st Century], Madrid: Instituto Nacional de Administración Pública, 2021a.