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Countering money-laundering through public-private cooperation in the Netherlands

Qualitative, explorative analysis into influences of external, structural- and -cultural conditions on perceptions and attitudes of decision-makers during network formation.

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'Vaak moet er iets gebeuren, voordat er iets gebeurt'

(Often, something has to happen, before something happens)

Johan Cruyff

1 Abstract

Public-private Financial-Intelligence Sharing Platforms (FISPs) contributed to changing the mindset between law enforcement agencies and regulated entities, in countering financial-economic crime. FISPs have yielded promising results and outcomes, albeit on a small and specialist scale. In the Netherlands a new FISP, the Serious Crime Taskforce (SCTF) is being created to produce joint-intelligence between banks and law enforcement agencies on professional money-launderers.

The initiative creates tensions as intensified cooperation crosses other roles, responsibilities and interests of participants under the formal regulatory system. The explorative study sought to contribute to the existing knowledge of networked cooperation by asking the question if, under the current circumstances, the SCTF can be expected to be efficacious, practicable and moreover, viable.

Using a descriptive theoretical frame, the study conceptualises how throughout different organisations perspectives, perceptions and considerations about the benefits, risks and challenges of intensified public-private cooperation are shaped. The study sought to accomplish this by:

- Identifying which structural and cultural conditions influence perspectives of organisations towards public-private cooperation;
- Exploring how shared goals, values and trust are perceived and acknowledged as elemental to yielding collaborative advantages and synergies;
- Indicating how, during network formation, interaction is shaped by overt and more tacit perception-patterns.

Research data were derived from semi-structured interview data, uniquely provided by ten strategically positioned decision-makers throughout various public, private and regulatory organisations in the Netherlands.

The study found that, despite noble and true intentions, external influences such as the aftermath of a record-fine issued to Dutch ING bank for non-compliance to financial-crime regulations, created ambivalence and uncertainty among participants. The study found indications that hidden and pseudo-goals may persist. Lack of transparency about interests and expectations, and lack of clear goal-setting and scope require serious management attention before the SCTF can be successfully launched.

2 Acknowledgements

Over the past two years, balancing work, family and study proved to be a dauntingly challenging experience. Somehow, I managed not to collapse. I promised myself to never give up and therefore decided it was best to enjoy this academic journey as much as possible. I spent many business trips, holidays, week-ends, evenings, nights, flights, train-rides and ferry-crossings reading, taking notes and writing. I came to love the deep-knowledge, the intellectual reasoning and, before all, the practical applicability of it. As my grades went up, I worked even harder. I wonder what to do next with all the spare time.

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Contents

1	Abstract	2
2	Acknowledgements	3
3	Introduction	7
	The Wicked Problem of Undermining Crime	7
	Financial Intelligence-Sharing Platforms (FISPs)	8
	Research Problem	9
	Aims of Research	9
4	Literature Review	12
	Organised crime and money-laundering	12
	Barrier-models	13
	Money-laundering typologies	13
	Professional enablers: <i>Brokers</i> and <i>facilitators</i>	14
	Regulations	16
	Interplay in the finance-security assemblage	17
	Responsibilisation.	20
	Public-Private Partnerships	21
	Risks and challenges	22
	Developmental stages of PPPs	23
	Cooperation or collaboration?	23
	Culture	24
	Common goals	26
	Shared values	27
	Trust	28
	Games and rules	29
5	Research Methodology	31
	Data Collection	31
	Research ethics	32
	Analysis	33
	Limitations	34
6	Analysis and Discussion	37
	Analytical frame	37
	Organisational perspectives towards intensified cooperation	38
	Societal/Political Influences	38
	Legal/Regulatory Influences	40
	Cultural conditions	42
	Prerequisites	43

Common goals	44
Common values	44
Trust	45
Longer-term Developments	46
Scale	46
A Shared Language	47
7 Conclusions	49
8 Reference List	52
9 Appendices	62
Appendix A. List of Abbreviations	Error! Bookmark not defined.
Appendix B. Ethics Approval Letter	Error! Bookmark not defined.
Appendix C. Consent Form ABN AMRO Bank N.V.	Error! Bookmark not defined.
Appendix D. Interview invitation e-mail.	Error! Bookmark not defined.
Appendix E. Participation Information and Consent Form 1 (gatekeepers).	Error! Bookmark not defined.
Appendix F. Participation Information and Consent Form 2 (non-gatekeepers)	Error! Bookmark not defined.
Appendix G. Interview Schedule	Error! Bookmark not defined.
Appendix H. Interview Questions and analytical design	63
Appendix I. Analytical Frame	64
Appendix J. Interview data R001	Error! Bookmark not defined.
Appendix K. Interview data R002	Error! Bookmark not defined.
Appendix L. Interview data R003	Error! Bookmark not defined.
Appendix M. Interview data R004	Error! Bookmark not defined.
Appendix N. Interview data R005	Error! Bookmark not defined.
Appendix O. Interview data R006	Error! Bookmark not defined.
Appendix P. Interview data R007	Error! Bookmark not defined.
Appendix Q. Interview data R008	Error! Bookmark not defined.
Appendix R. Interview data R009	Error! Bookmark not defined.
Appendix S. Interview data R010	Error! Bookmark not defined.

Figures and Tables

Figure 1. The finance-security assemblage in The Netherlands	17
Figure 2. Agency and interplay in the finance-security assemblage in The Netherlands	19
Table 1. The Relationship Continuum	24

3 Introduction

Organised crime's many corrupting and distorting effects on civic society, causes that traditional crime prevention approaches reached their limits (Kolthoff and Khonraad, 2016; Bruns, 2014). Especially the topical problem of professional money-laundering requires continuous and current intelligence which vested actors and procedures can no longer cater for alone. Unger *et al*, (2018) estimate the size of money-laundering in the Netherlands to be around 16 billion Euros, nearly 2.5% of GDP. Banks, as custodians of client and transaction-data, are regarded crucial to generate actionable intelligence needed for improved crime prevention and investigative purposes (Ratcliffe, 2012). On this notion, law enforcement agencies approached four major Dutch banks in mid-2018 to discuss possibilities of founding a thematic taskforce on professional money-laundering.

The study discusses interactions between law enforcement agencies banks and regulators, thereby leaving out of scope other regulated entities, and limiting analysis to organisational rather than interpersonal interactions.

The Wicked Problem of Undermining Crime

Dutch Organised Crime Groups (OCGs) are prominent since the 1970s, initially as distributors and subsequently also as mass-producers of (synthetic) narcotics (Spapens, 2011; Boerman *et al*, 2017). Organised crime received serious scientific attention from the 1990s on, wherein Fijnaut *et al* (1996, as cited by Duijn, 2016) were first to describe how OCGs bypass scrutiny. Later research of Joldersma *et al* (2008) posited a pronounced vision of systematic involvement in organised crime by occupational groups, such as real-estate brokers and financial services providers.

In the last decade, new actors involved in large-scale cultivation and smuggling of marijuana, XTC and cocaine, as well as human trafficking, employed unprecedented levels of violence, extortion and corruption (Waardenburg *et al*, 2018; Boutellier *et al*, 2016). Organised crime is since considered an outright threat to civic society and its institutions, especially to the democratic rule-of-law and the financial-economic system (Kolthoff and Khonraad, 2016; Unger *et al*, 2018). It is described by its effect as *undermining crime*. This crime problem generates a "wicked problem" (Koppenjan and Klijn, 2004; p.28) not only by complexities that make it impossible for a single agency or sector to solve it, but moreover by the controversial nature of undetermined and untested solutions, such as far-reaching data-sharing, and other non-conventional means. These uncertainties create untamed political disagreement and opportunism (Koppenjan and Klijn, 2004), in line with Kolthoff and Khonraad's (2016) observations that using the term undermining crime is often politically rather than scientifically motivated.

Financial Intelligence-Sharing Platforms (FISPs)

Money-laundering is criminalised in the Netherlands since 2001. It upholds a regulatory system that makes banks responsible as gatekeepers of integrity in the (Levi and Reuter, 2011; Loader and White, 2017). Banks are bound to that responsibility by imposed compliance through fear of potential regulatory censure and penalisation (The Clearing House, 2017) by the Dutch Central Bank (DNB) and the European Central Bank (ECB). As the regulatory system is increasingly regarded as inflexible and ineffective, experimentation with improved information-sharing within and between the public-and private sector emerged in jurisdictions outside the Netherlands (The Clearing House, 2017). These Financial Information Sharing Platforms (FISPs) co-exist, albeit on a modest scale, with persistent regulatory obligations. FISPs demonstrated the advantages of optimised intelligence-sharing as part of more holistic, integrated strategies towards money-laundering (Maxwell and Artingstall, 2017). Networked cooperation links capabilities and resources of different actors to facilitate joint action, but also leverages joint learning and innovative intervention strategies (Mandell and Keast, 2008).

The research refers to the ongoing founding process of a Serious Crime Task Force (SCTF) (Openbaar Ministerie *et al*, 2018) in the Netherlands. The SCTF engages public and private organisations, including two law enforcement agencies (the National Police, the Fiscal Intelligence and Investigation Department (FIOD)), the Prosecutor's Service (OM), the Financial Intelligence Unit (FIU) and the four largest Dutch banks (ABN AMRO, Rabobank, ING and De Volksbank). Scheduled to launch in Spring 2019, the SCTF will be tasked to map criminal money-flows and professional facilitators related to specific criminal networks that have a high law enforcement priority. Two earlier Dutch taskforces, the Electronic Crimes Taskforce (ECTF, founded in 2012) and the Terrorist Financing Taskforce (TFTF, founded in 2017) demonstrated potential added-value of networked cooperation. During data-collection, the Dutch experience with PPPs was acknowledged by Europol (R008):

“From a pan-European perspective, the Dutch are by far the most advanced when it comes to cooperation, [especially] with their counter-terrorism taskforce”.

To a degree, the SCTF mirrors the UK's Joint Money-Laundering Intelligence Team (JMLIT) which was established in 2016 as a voluntary forum to convene public-private dialogue and co-develop risk typologies of money-laundering related to five types of organised crime, and terrorism (Maxwell and Artingstall, 2017). JMLIT connects vetted actors from sizeable banks, law enforcement agencies, the FIU and trade associations, within legal boundaries of existing legislation. The taskforce operates under auspices, coordination and responsibility of the National Crime Agency (NCA). First, JMLIT enhances resilience of the financial sector by sharing intelligence also with non-members. Secondly, the network

facilitates controlled exchange of tactical information, including personal data, from public to private participants. The resulting combined intelligence enables participants to pinpoint and manage criminal conduct and risks, both in their own organisations and collectively (Maxwell and Artingstall, 2017).

The SCTF's ambitions are twofold. Track 1 comprises enhancing societal and sectoral benefits by making suspicious transaction reporting (STR) more effective by improving capabilities to gain and process intelligence about professional criminal enablers via tangible and practicable leads offered by state to private actors. Track 2 includes using analytical outcomes to convene interdisciplinary dialogue on financial-crime threats, exchange expertise and techniques, and co-develop or improve risk typologies and practices (Openbaar Ministerie *et al*, 2018).

Research Problem

FISPs are communalising alliances (Loader and White, 2017) that generate synergetic advantage via shared goals, mutual values and trust (Prenzler and Sarre, 2012). The paradoxical nature of networked cooperation should not be disregarded, as despite inherent interdependencies, organisations maintain inevitable differences in structures, cultures and interests, which makes the management of public-private networks extremely complex (Vangen and Huxham, 2013). The current situation, whereby the public sector on one hand reaches out to banks, but expresses extreme criticism on the other (Heijn, 2018), begs the question if founding the SCTF will be efficacious, viable and moreover, practicable at this stage. The dissertation seeks to answer this question via the following research problem:

“How do inter-organisational and cultural factors influence public-private collaboration aimed at countering professional money-laundering in the Netherlands?”

Aims of Research

The SCTF's mission to generate intelligence about intermediaries facilitating (legal) financial-economic services in criminal value chains (Gottschalk, 2009) is considered a viable crime prevention strategy (Duijn, 2016). Willingness and legal possibilities of sharing confidential data, and combined analysis thereof, form crucial preconditions of networked cooperation. The dissertation concentrates on the first, sharing intelligence, not the latter because disruptive interventions are (currently) not in the SCTF's scope (Openbaar Ministerie *et al*, 2018). Although some respondents considered this a crucial design-inconsistency, interventions are undertaken separately by public (prosecution, administrative action) and private organisations (de-banking) (de Oliveira, 2016). In this respect, the SCTF is a true FISP.

The SCTF's synergetic depend on willingness of participating organisations (hereafter: partners) and individual actors therein to share information, thereby speeding up the circulation of knowledge to facilitate joint problem solving (McEvily, Perrone and Zaheer, 2003). This study therefore hypothesises that:

H1: efficacious participation is defined by willingness to actively share confidential information with other taskforce participants.

Willingness is expected to be determined by structural and cultural conditions within each participating organisation, which thereby are both conditioning variables and critical success factors (Mullins and Christie, 2016). The study explores how predispositions about other participants, and (perceived) boundaries of laws and regulations, shape network interaction (Koppenjan and Klijn, 2004). Reluctance to cooperation might, for instance, be defined by formal mandates or emerge from hard-rooted scepticism about other participants' roles or intentions (Visser et. al., 2008; Koppenjan and Klijn, 2004). The research-project explores these conditioning variables via the following research question:

1. How do political/societal, regulatory and cultural conditions influence willingness to actively share information and engage with all partners?

Earlier alliances, such as JMLIT, were founded on innovative drives of a few visionary front-runners in the leadership of different organisations, who had confidence in envisioned synergies and the true intentions of other partners (Maxwell and Artingstall, 2017). Trust is thereby both a precondition and a result of cooperation, which institutes willingness and transparency even when outcomes are uncertain (Koppenjan and Klijn, 2004).

Previous experiences with taskforces proved that reluctance to recognise other organisations as trustworthy or equally competent, are overcome once a taskforce has offered demonstrable returns to its goals (Avina, 2011). This depends most on the establishment of effective relationships (Keast and Mandell, 2012). Besides trust, shared values and common goals are regarded exponents of partners' confidence in the efficacy of a network, rendering these three elements prerequisites for successful co-operation (Avina, 2011; Prenzler and Sarre, 2012). The research-project sought to explore this via the following research question:

2. To what extent are trust, common goals and shared values viewed as prerequisites for successful collaboration in public-private cooperation?

Koppenjan and Klijn (2004) argue that network interaction can be studied in two ways. First by considering institutional characteristics of partners as a given - an independent variable- that shapes behaviour in networks. In an experimental setting, H1 would then be a dependent variable. Although the research project does not include experimentation, this notion is covered by research question 1. The alternative approach regards interaction-patterns, outcomes, games, perceptions, rules, and responses to external developments as causal to institutional attitudes, reversing the notions of dependent and independent variables. Generally, formative process and early operational stages of networks constitute high degrees of uncertainty about interactions and outcomes (Koppenjan and Klijn, 2004), But, are these phases indicative for future network performance? The latter aspect of networked cooperation is explored via the final research question:

3. How can trust, confidence in goals and shared values be expected to shape overtime in response to collaborative processes?

The research-project aims to contribute to academic knowledge of networked cooperation in the Netherlands. It explores how institutionalised attitudes and motivations are engendered by structural and cultural organisational conditions, and how they interact with shared values, goals and trust. This helps to understand how process variables shape behaviour (Mandell and Keast, 2008), and *vice versa*.

Attitudes towards networked cooperation may vary per organisation, which influences the viability of the SCTF's mission. The study not only seeks to contribute to academic understanding of network processes, but also to current and future policy development in the Netherlands. The study offers practicable advice to decision-makers currently involved in designing and preparing to govern the future SCTF, and help prepare for, manage and overcome anticipated inter-organisational challenges.

4 Literature Review

The literature review provides a backdrop as to why public-private intelligence sharing (Shearing and Wood, 2003) is considered a promising development in tackling money-laundering (Maxwell and Artingstall, 2017). The development of organisational attitudes towards public-private partnerships (PPPs) in this field, lies encapsulated in three contexts.

The first section describes the inherent nature of organised crime as a complex adaptive system (Duijn, 2016). Two types of professional money-launderers are introduced: *brokers* and *facilitators*. These agents are central in the SCTF-concept.

Albeit some scholars regard it conceptually worn-down and outdated (Kruisbergen and Soudijn, 2015), the second section covers crime prevention mechanisms of anti-money-laundering and counter-terrorist financing (AML/CTF) regulations, responsabilisation and proposes how public-private information-sharing is complimentary to existing regulatory concepts. The section depicts how different actors involved in the regulatory regime orbit in varying roles, positions and relations around the central theme of crime prevention. In any case, to follow Bourdieu's line of thinking (Leander, 2009), it is safe to say no undifferentiated, single field of countering money-laundering exists.

The final section presents an overview of social and organisational aspects of public-private cooperation, derived from a broad variety of theory. Its central theme are the prerequisites for cooperation: shared values, common goals and trust, and how these interact with structural and cultural conditions in participating organisations.

Organised crime and money-laundering

Organised crime groups (OCGs) are typified by loose organisational structures. As they depend on concealment of operations and profits from the prying eyes of authorities and aggressive competitors, they engender high levels of contingency and resilience (i.e. ability to absorb disruption) (Duijn, 2016; Korsell and Skinnari, 2013). Duijn (2016; p.17) defines OCGs as “complex adaptive system[s]”, self-organising, highly dynamic constellations able to constantly adapt size, structure and behaviour according to the changing behaviour of individual agents, and of external influences.

Often, OCGs are established upon family ties or vernacular social relationships originating from pre-criminal local or ethnical social contexts (Kruisbergen, Kleemans and Kouwenberg, 2015b). Both offending and the criminal lifestyle – the two are not always easily discernible- blend into existing social environments, leaving them virtually inaccessible to infiltration and ethnographic academic research

(Malm and Bichler, 2013; Hancock and Laycock, 2013; Morselli, 2009; Rawlinson, 2008). A common critique concerns this lack of empirical evidence (Unger *et al*, 2018), whereby data utilised for academic analysis often originates from police case-files, which may be less apt for academic or policy research due to their bias towards evidence-building (Duijn, 2016). The traditional focus of organised crime-research rests with offenders rather than offences (Kleemans, Soudijn and Weenink, 2012). Long-lasting fixation on criminal hierarchies and myths of criminal organisations as static, monopolistic firms (Gottschalk, 2009), underestimates the versatile nature of OCGs, and institutes *de facto* ineffective prevention strategies.

As organised crime concentrates on financial gains via production, distribution or sales of illegal commodities and services, it forms a “rational crime par excellence” (Cornish and Clarke, 2012; p.41). Criminal operations are often compared to regular business processes operating in competitive criminal markets (Soudijn, 2012) which, as any corporation, require funding and management (Dugan and Gibbs, 2009). This criminal enterprise paradigm (Kruisbergen, Kleemans and Kouwenberg, 2015a) describes crime as a value chain, analogue to Porter’s (1985, as cited by Gottschalk, 2009) classic economic model, even though not every criminal organisation produces or distributes goods sequentially.

Barrier-models

Designing crime prevention-strategies benefits from deducing criminal sub-processes, opportunity structures and key actors to illicit operations. In addressing the question *how* organised crime can be disturbed, Crime Scripting techniques are useful to systematise what each stage (i.e. scene) of a criminal business process requires in terms of actors, coordination, equipment, locations, activities and funding (Cornish and Clarke, 2012; Duijn, 2016), whereby Levi (2015) calls for more typologies of financial dependencies in criminal markets.

In the data some referral is made to so-called Barrier-models, which in the Dutch criminological field are common analytical models based upon contemporary classicistic criminological theory, such as Situational Crime Prevention (SCP), to define dependencies in criminal logistical and finance chains. Barrier-models help identify suitable public and private actors able to erect barriers that disrupt criminal processes (Spapens, 2011; Newburn, 2013; Bruns, 2014).

Money-laundering typologies

Money-laundering is the criminal value chain’s final stage, concerned with both concealment and control over illicit proceeds under the veil of financial-economic legitimacy (Levi and Reuter, 2011). It is often unjustly identified with the esoteric trade of elaborate financial structuring or higher accountancy

(Soudijn, 2012). Nor does money-laundering always submissively follow FATF's famous three-phased sequence of *placement* (introducing illegal proceeds into the legal financial-economic system); *layering* (concealing criminal proceeds in the legal economy, via front companies, complex financial constructions, or false documentation); and *integration* (utilising originally criminal monies for legitimate purchases or investments) (Kruisbergen and Soudijn, 2015; Soudijn, 2012).

Research, again based on law enforcement files, revealed that few criminals require professional launderers (Levi and Reuter, 2011), as their economic behaviour is mostly linked to social opportunity structures (Kleemans and De Poot, 2008; Malm and Bichler, 2013). This view is underpinned by Kruisbergen, Kleemans and Kouwenberg (2015), who found that in the Netherlands most criminal proceeds are self-laundered via consumption or re-financing of new crimes, rather than via investments in the legal economy. In a larger-scale empirical study in Canada, Malm and Bichler (2013) discovered 80% self-laundering and 12% opportunistic laundering via the criminals' immediate social networks, involving relatives or friends in hiding illegal proceeds. Only 8% consisted of professional money-laundering.

Although professional launderers seemingly represent a minor contingent in the greater scheme of organised crime, they are relevant. The SCTF's focus is justified by the severity, size and impact of predicated crimes which feature professional enablers. Soudijn (2014) found extensive involvement of such facilitators in crime scripts generating large profits, or requiring extensive cash handling, such as cocaine smuggling or XTC production (Soudijn, 2014). These crimes are not only most profitable, but also most undermining.

Professional enablers: *Brokers and facilitators*

To best comprehend the SCTF's ambitions of targeting professional money-launderers, they are best regarded as the investment bankers of the underworld, active only throughout serious forms of crime. They amplify the problem of undermining crime by enhancing chances that crime generates rewards (Bruns, 2014; Unger *et al*, 2018). Their key positions and low substitutability, render them prime targets for government initiated disruption-strategies (Duijn, 2016).

The dichotomy between *facilitators* and *brokers* is best understood as a distinction between *human capital*, defined by unique skills and knowledge, and *social capital*, determined by network positions. Professional money-launderers can be broker and facilitator at the same time, (Duijn, 2016).

From a Social Network Analysis perspective, brokers are nodes that link previously unconnected criminal and non-criminal actors and (sub)networks wishing to transact with each other (Soudijn, 2014).

Brokerage positions are essential catalysts for finding replacements to redundant central network positions after government or competitive interference (Duijn, 2016). Under Crime Script Analysis, brokering “crime-as-a-service” (Duijn, 2016; p.23) increases permutation levels in criminal macro-networks, which enhances the number of options available to execute various scenes under a crime-script (Morselli, 2009).

Typically, facilitators are not involved in predicate crimes. Their human capital is contracted to solve logistical or financial problems, or to enable concealed consumption by setting up legal financial or corporate structures. From the criminological instead of the criminal law perspective, facilitation is not limited to aiding and abetting commission of crime, but encompasses any service-delivery essential to (part of) a crime-script (Soudijn, 2012). In the general perception, criminal facilitation is synonymous with bankers, public notaries, lawyers and accountants misusing professional titles, privileges and licenses (Duijn, 2016; Soudijn, 2012). In practice it mostly involves non-licensed professionals such as car-dealers, rental companies and real-estate agents (Kruisbergen and Soudijn, 2015). Another important distinction is between activities centred on cash (cash smuggling, currency exchange, underground banking), and much smaller contingents of financial specialists obfuscating origins of criminal proceeds by creating financial constructions sembling legitimacy (Soudijn, 2014). Analogue to FATF-typologies, the first group is involved with *placement*, whereas the second group is more closely tied to *layering* and *integration* (Soudijn, 2012).

Since the 1990s, Dutch law enforcement targets logistical and money-laundering channels offered by criminal enablers. In 2005, the joint Chiefs of Police’s strategized policing the networked society, by concentrating surveillance and investigative capabilities on criminal convergence settings, i.e. intersections between criminal and legal infrastructures through which illicit products, funds and information are channelled, including the financial-economic system (Duijn, 2016; Kleemans, Soudijn and Weenink, 2012).

The effectiveness of this nodal-orientation was affected by underlying organisational factors. First, political-administrative relations (Koppenjan and Klijn, 2004) caused both police and political leadership to demand swift results, concise decision-making and cost-control, often at the expense of time provided for thorough criminal network analysis (Ratcliffe, 2012; Visser *et al*, 2008). Secondly, despite the mantra of *follow-the-money*, persistent perception-patterns in law enforcement restrained financial investigation capabilities from becoming mainstream (Levi, 2015). Most investigative effort remained concentrated on high-profile perpetrators and large seizures, cynically phrased as: ‘kerels en kilo’s’ (*guys and kilos*) among financial investigators. Third, the police’s “go-alone strategies” (Koppenjan and Klijn,

2004; p.50) lacked coordination with public, private or academic partners, and left strategic dependencies and opportunities neglected or overlooked (Bruns, 2014). This institutional attitude is culturally rooted in historical dispositions of law enforcement agencies as the exclusive agents governing security under state-auspices (Shearing and Wood, 2003), and an understandable effect of the confidential nature of police work (Avina, 2011). To date, this complicates access of outsiders to their field.

Regulations

Criminalisation of money-laundering strategized countering the global illegal drug trade. This resulted in extensive regulatory frameworks to disincentivize banks and other regulated occupational groups from accepting criminal influences in their regular business activities (Levi and Reuter, 2011; Gallant, 2014). Levi and Maguire (2004) argue that relationships between money-launderers, whether facilitators or self-launderers and the financial services industry has not always been entirely hostile, whereby wilful blindness and “commercial sociopathy” (Levi, 2014; p.257) gradually became heavily penalised. This was illustrated last year in the Netherlands by an unprecedented 775 million Euro settlement of Dutch ING Bank over AML/CTF compliance failures (Openbaar Ministerie, 2018). The ING case was not rooted in wilful intent, but had business-administrative origins, e.g. shortfalls in resources and expertise, ambiguous articulation of internal responsibilities, lack of social antennae, and functional rationalities wherein efficiency prevailed over the perceived significance of gate-keeping (Veenswijk and Hakvoort, 2002; Openbaar Ministerie, 2018). This study assumes that all banks participating in the described networked cooperation are intrinsically motivated to avoid becoming (involuntary) facilitators of crime (Kolthoff and Khonraad, 2016).

The regulatory framework forms a cleansing model of governance (Loader and White, 2017), which induces accountability for crime control to regulated entities at the risk of losing -formal or reputational- licenses-to-operate. Similar to other jurisdictions, the Dutch anti money-laundering act WWFT, obliges regulated entities to conduct customer due-diligence (CDD) and requires elaborate scrutiny of customers matching pre-defined risk profiles. Secondly, banks must monitor transactions and share suspicions of illegality with the Financial Intelligence Unit (FIU) (De Oliveira, 2016). Throughout this dissertation, reporting obligations are summarised as Suspicious Transaction Reports (STR), although also other terms are common. Specific for the Dutch situation is the distinction between Unusual Transactions (OTs) reported by banks, which can be upgraded into Suspicious Transactions (VTs) when found connected to specific crimes, other STRs, or ongoing criminal investigations. The FIU normally notifies banks when OTs are upgraded into VTs, but usually without revealing any details.

When Situational Crime Prevention (SCP) techniques are applied to the AML/CTF regulatory framework, the extension of guardianship to the private domain renders financial-economic infrastructure a to-be-protected target of crime (Kleemans, Soudijn and Weenink, 2012; Hirschi, 2012). The regulatory model internalises some SCP mechanisms: increased risk of detection; reducing anonymity; and denying perpetrators spoils of crime by improving possibilities for seizures and asset-freezes (Clarke and Bowers, 2017; Levi, Halliday and Reuter, 2014). Furthermore, the regulatory regime removes excuses of both knowing and unknowing facilitators of crime, by setting rules and by enhancing awareness and conscience-levels (Kleemans, Soudijn and Weenink, 2010; Soudijn, 2012).

Interplay in the finance-security assemblage

Criminal justice is the regulatory framework's prime control mechanism, whereby regulated entities bear responsibility for detection and prevention, law enforcement agencies provide repression and prosecution, and regulatory bodies operate as supervisors (Shearing and Wood, 2003). Interaction between various public and private actors apparently seems embedded in the interdisciplinary finance-security assemblage in the Netherlands, (De Goede, 2012), which is schematically depicted in Figure 1. This has, however, not led to frictionless interplay and shared learning between its members.

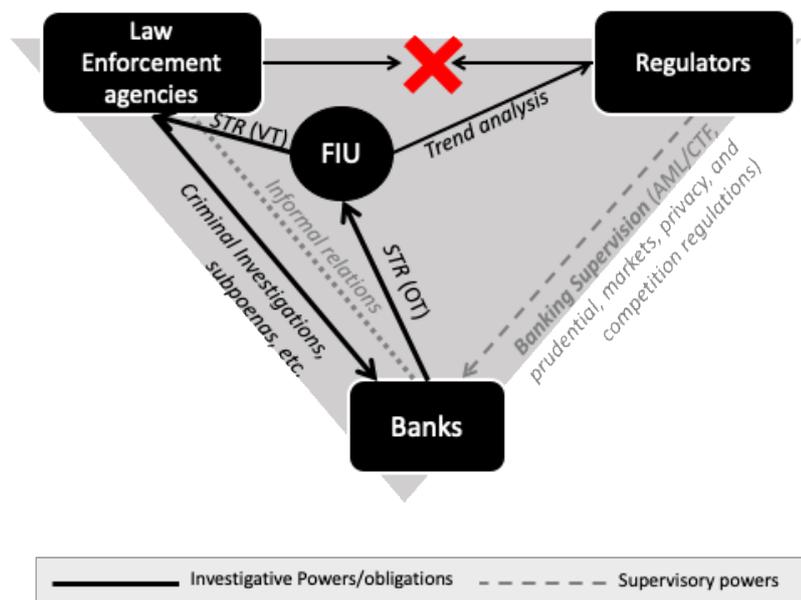


Figure 1. *The finance-security assemblage in the Netherlands*

Whereas law enforcement agencies are end-users of STRs, they frequently interact operationally - though hardly ever strategically- with banks and sometimes even develop informal, horizontal relations. Regulators have little interaction with law enforcement and -unless the investigation concerns a regulated entity- are not mutually privy to investigative or supervisory priorities. Relations between

banks and independent, semi-governmental regulators are almost always formal in nature, and take place on strategic levels.

The system's ineffectiveness is amplified by asymmetric dependencies, subjecting it to deeply-rooted macro-level forces and habitual interaction- and perception-patterns originating from the structural organisational conditions depicted in Figure 2. Under the organisational mechanism of "bounded rationality" (Koppenjan and Klijn, 2004; p.48), nodes prefer focus on realisation of their own objectives rather than attributing to strategic goals of others (Shearing and Wood, 2003). Regulators, for example, have long concentrated on reporting processes without considering the value and quality of STRs for law enforcement purposes.

Another mechanism are assumptions about the significance, and moral or pragmatic legitimacy of one's own organisation, which are basic formative conditions to organisational identities and cultures (Veenswijk and Hakvoort, 2002; Adams, 2014). Subsequent habitual perception-patterns regarding the authority of other institutions or occupational groups, for instance, engender convictions that securing the public good is to be monopolised by the state (Koppenjan and Klijn, 2004; White, 2014). Under this mechanism, viable pragmatic improvements proposed by non-state actors easily provoke admonition from vested institutions governing the norms under state-auspices (Fleming and Rhodes, 2005).

Finally, "primacy of politics" (Koppenjan and Klijn, 2004; p 91) creates value hierarchies which allow elected representatives *prima nocte* in weighing interests over societal questions, such as crime, and typically places political judgements above other interests. The latter mechanism links to political-administrative relations with the subordinate bureaucratic apparatus, and may subject investigators, prosecutors and regulators to the political agendas of accountable office-holders (Koppenjan and Klijn, 2004).

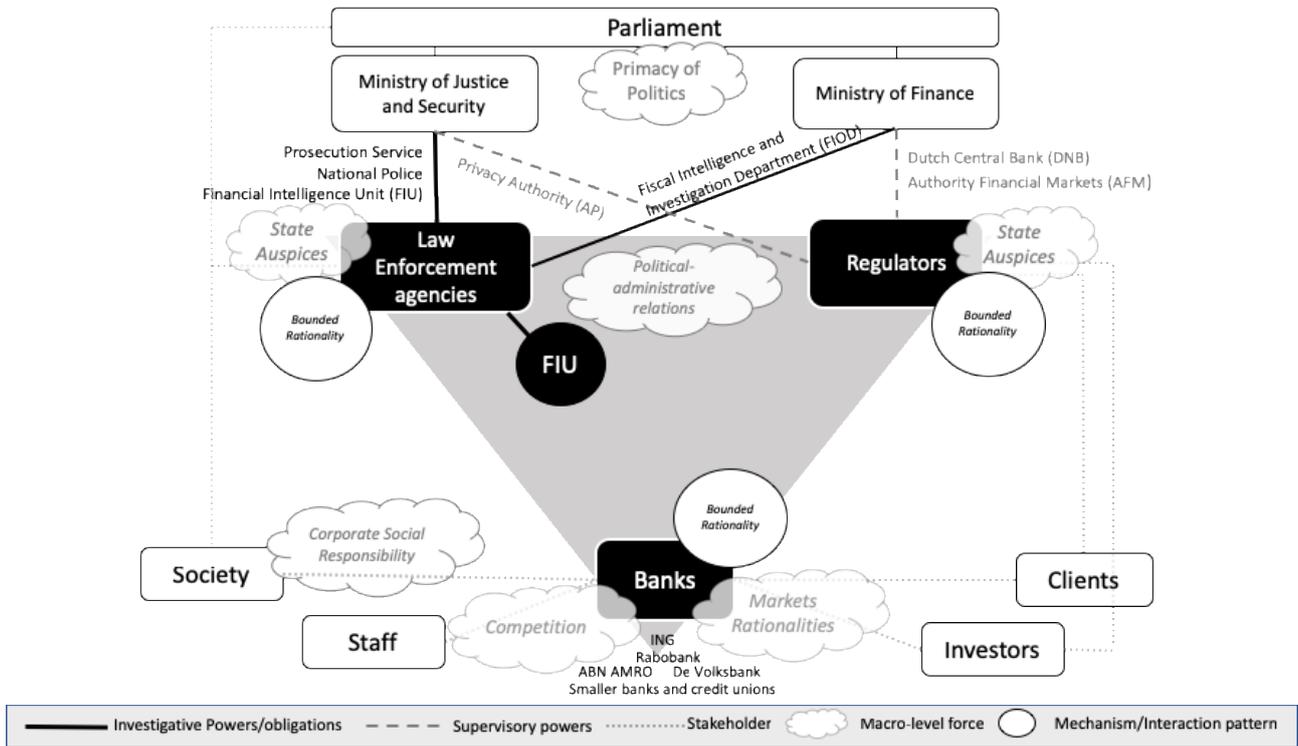


Figure 2. Agency and interplay in the finance-security assemblage in the Netherlands

Primacy of politics stimulated primacy of policy by way of a vast legalistic regulatory framework, that institutes a “culture of control” (Simon, 2007 as cited by Hoogenboom, 2010; p.75.) and resonates political rhetoric. Developments such as global terrorism, and scores of corporate scandals including aforementioned ING case, instituted signal crimes (Hinds and Grabosky, 2008) that drive wedges between public-private relations.

Given the stakes of financial institutions in maintaining business licensure, they are more easily deterrable than OCGs (Levi and Reuter, 2011). This seemingly transformed original regulatory foci from countering crime to exhortation of accountability on the gatekeepers (Adams, 2014), thus detaching regulatory priorities from chief law enforcement strategies (De Oliveira, 2016). Since compliance-failure seemingly inevitably results in heavy fines, and criminal culpability of the gatekeepers (The Economist, 2014; Europol, 2017b) it causes some acquiescence in the financial sector. This leads to an exclusive focus on meeting technical regulatory standards and upholding due diligence defence to avoid liability, rather than concentration on the underlying crime problem (Pieth and Ivory, 2011).

The number of actors involved in financial-economic crime compliance in banks has grown exponentially, and thereby created whole sub-cultures incorporating opposing views, interests and priorities, leading to ever-looming office politics and loss of oversight and coordination (Schein, 2010, Bamfield, 2014). Desire to avoid censure incentivises over-reporting. Vast amounts of unfocused and poor-quality information enter the already over-burdened legal system (Nieuwsuur, 2018; De Oliveira,

2016). Of this enormous pool of data, little is utilised for criminal investigations (Levi and Reuter, 2011). Europol (2017a) estimates that only 10 percent of STRs received by FIUs in the European Union is investigated further, and that two thirds thereof either cite tax crimes or fraud as underlying offenses, not money-laundering.

Responsibilisation.

Yet, AML/CTF regulations provide no appreciable indications of decreasing tainted finance (Gallant, 2014). Notwithstanding its unquestionably noble intentions, the control-orientated regulatory system lacks resilience and flexibility to adjust to the elusive, dynamic features of organised crime (Loader and White, 2017). As compliance is not directly linked to crime prevention, it turns banks into “grudging informants” (Gilsinan *et al*, 2008; p.113), that manage various implications of the regulatory frame. Overly aggressive response towards transaction monitoring, for example, jeopardises good customers’ privacy and data-confidentiality, over-complicates and delays internal processes, and requires extensive and expensive staff deployment (Gilsinan *et al*, 2008).

In response to shortcomings of AML/CTF regulations, a degree of responsabilisation of the private sector took place (Loader and White, 2017; White and Gill, 2013). This exemplifies the shift from government to governance, whereby states devolve responsibility for delivering public services, such as crime control, from their own hierarchical bureaucracies to non-state agents (Bevir and Hall, 2013; Hinds and Grabosky, 2008). Over the last decades, New Public Management’s cost-orientated ambitions separated authority from responsibilities, which increased involvement of non-governmental agents in governmental tasks, varying from engaging interest groups to outsourcing and PPPs (Visser *et al*, 2008; Rufin and Rivera-Santos, 2012; Bevir and Hall, 2013). There are three ways of responsabilisation. First, by *abdication*, including withdrawing from and leaving crime control functions to the market; second, by *exhortation*, as with AML/CTF regulation, whereby governments offer incentives, or impose disincentives to ensure implementation of certain crime prevention practices; third, by *compelling* (corporate) citizens to voluntarily accept responsibility for prevention, self-protection or co-production in PPPs (Hinds and Grabosky, 2008).

With responsabilisation, the state implicitly acknowledged its limitations in providing crime control (Garland, 1996; Van Steden and De Waard, 2013). Systematic lack of (capable) resources and funding of law enforcement, forced the private sector to the forefront of financial-crime control (Levi, 2015). Despite conscription of banks as law enforcement auxiliaries, the regulatory system does not treat them as competent equals of state-actors (Hardouin, 2009; Maxwell and Artingstall, 2017). As long as there may be reason to regard banks as part of the problem, asymmetries will persist, making it more logical to

impose coercive control than to grant social responsibility (Gallant, 2014; Levi and Reuter, 2011). This dissertation argues that asymmetries in the finance-security assemblage may be counter-productive and can benefit from compelling rather than induced responsabilisation (Hinds and Grabosky, 2008). As long as STR reporting remains one-directional, and gatekeepers are portrayed as part of the problem rather than the solution, avoidance of reputational damages and regulatory censure will outweigh all efforts to contribute to effective crime risk management (De Oliveira, Keatinge and Stickings, 2016). Empowering the financial sector as socially engaged “enthusiastic intelligence operatives” (Gilsinan *et al*, 2008; p.115), may eventually staunch the flood of less-relevant STRs (Maxwell and Artinstall, 2017).

Public-Private Partnerships

Key stakeholders, most noticeably FATF (2017), acknowledge individual organisations’ limitations in overseeing modern criminal threat landscapes, and put cooperation centre-stage (World Economic Forum, 2018). PPPs are networked arrangements offering organisational solutions to pressing societal problems, such as organised crime (Brinkerhoff and Brinkerhoff, 2011). Three prerequisites determine, motivate and influence those enacting networked interaction in practice, and eventually define its success: shared commitment to protect shared (societal or economic) values (Sydow, 2004); commitment to common goals therein (Fleming and Rhodes, 2005), and trust (McEvily, Perrone and Zaheer, 2003). In the interplay between these prerequisites resonates the importance of leadership (Huxham and Vangen, 2005).

The drive behind PPPs is to create synergies in providing mutual voluntary access to key resources facilitating joint aspirations of coordinated action and learning (Flinders, 2005; Brinkerhoff and Brinkerhoff, 2011). PPPs are goal-directed, consciously constructed multi-sectoral networks, founded on the acknowledgement of dependencies, whereby resources required to solve designated problems lie divided over various public and private actors (Koppenjan and Klijn, 2004). Resources entail either hard (funding) or soft resources (information, expertise, contacts, or credibility and legitimacy) (Brinkerhoff and Brinkerhoff, 2011).

Core to network theories is the centrality of relationships, either established on formal or economic ties or on informal social engagements (Wasserman and Faust 1994, as cited by Keast, 2013). Koppenjan and Klijn, (2004; p.69-70) define networks, (including PPPs), as:

“more or less stable patterns of social relations between *mutually dependent* actors, formed *around policy problems* and/or clusters of means, ... formed, maintained and changed through a series of *interactions*, in which the ultimate outcomes of policy processes are realized”.

Although originally confined to infrastructure projects, PPPs became mainstream under the influence of New Public Management (Rufin and Rivera-Santos, 2012). To date, PPPs predominantly promote government-owned objectives, whereby data or resources from established organisations provide useful additions to serving public interests, concisely described by (Prenzler and Sarre, 2012) as “*investment[s] without burdening taxpayers*” (p.150). Despite responsabilisation, governments fund most crime-control measures, which upholds existing asymmetries and imperfect alignment of mutual goals and interests (Rhodes, 2007; McEvily, Perrone and Zaheer, 2003). Van Steden and De Waard (2013), however, posit that governments can only expect to maintain their leading role in policing and securing the public good when they are willing to involve others.

Risks and challenges

Besides some much-echoed advantages of cross-sectoral alliances, PPPs engender unique risks and challenges (Van Gestel and Verhoeven, 2011). The reliance on relations in networks breeds paradoxes and potential issues, stemming from having to manage mutually exclusive interests and inevitable cultural diversity between partners (Vangen and Huxham, 2013). Intra-organisational rivalry, external influences, formal positions and inter-organisational politics often dominate membership conditions and may undermine anticipated collaborative advantages (Brinkerhoff and Brinkerhoff, 2011). Leadership of networks must understand this, and actively address potentially blocking issues among participants in order to yield advantageous synergies instead of inertia, which frequently makes networked cooperation tedious and conflict ridden (Vangen and Huxham, 2013).

Problems can arise from under-development of theoretical network research, which has been restrained by adaptations of sometimes disparate theoretical disciplines -mainly business literature- to explain network functioning (Keast, 2013). This led to unjust propensities to treat networks as stable, undifferentiated, one-dimensional entities, and disregard much of their unique synergetic properties (Mandell, 2013).

Van Gestel and Verhoeven (2011) discovered three core discrepancies between pledged and active participation in PPPs. First, uncertainties over the network’s mission and goals can stir acquiescence and smother ambitions; secondly, self-centeredness or lack of confidence over the network’s added value causes participants to falter or even hinder initiatives; thirdly, failing internal communication and coordination can cause operatives - usually not privy to considerations and negotiations made at decision-makers’ levels- to develop reluctance to innovate normal working-practices, or withhold others from joining their subcultural fields. 9660 the leadership of participating organisations to clearly

envision the exiting, ennobling possibilities and advantages of networked cooperation (Kouzes and Posner, 1996).

Developmental stages of PPPs

The first phase of PPPs, *Network Formation*, comprises a sequence of *dialogue*, wherein state agencies and private entities discuss mutual interests; *demand* wherein partners conceptualise targeted strategies to countering a specific problem, and explore core competencies and interests; *design* -the current phase of the SCTF- whereby they construct governance and operational structures; and finally *dissemination*, in which approaches are developed to operationalise the concept (Avina, 2011). Contractual agreements -typically called *convenants* in the Netherlands- guard against opportunistic behaviour by specifying commitments, contributions, obligations, governance structures and conflict-resolution mechanisms (Vangen and Huxham, 2013; Rufin and Rivera-Santos, 2012). In severe and obvious social problems consensus is sometimes surprisingly easily established, compared to challenges encountered in the subsequent developmental phases of *Network Stabilisation* -key stakeholders' recognition and acceptance of the network, and the strength of commitment to accomplishing goals, *Network Routinisation* -wherein shared beliefs, norms and rules are developed-, and *Network Extension*, wherein new members are invited, links with other networks are laid, or networks dissolve (Sydow, 2004; Mandell and Keast, 2008; Visser *et al*, 2008).

Cooperation or collaboration?

Keast and Mandell (2014, p.9) argue that pervasive cults of collaboration have arisen around aspirations of reaching collective advantages, whereby vague political rhetoric arbitrarily mixes notions of collaboration, cooperation and PPP to define all variations of "working together". In this debate specificity about practices, skills, terms and competencies, required for sustained cooperation, often lacks. In attempts to move beyond the political rhetoric, Keast and Mandell (2014) developed an analytical model to distinguish between different types of alliances, based upon required competencies, intensity of linkages, and degrees of formality, risk-acceptance, and trust governing the integration of activities and relationships (Table 1).

Cooperation	Coordination (project)	Collaboration (network)
Low trust-unstable relations	Medium trust - based of prior relations –project structure	High trust – stable relations
Infrequent communication	Structured communication flows	Intensive communication flows
Known information sharing	Project-related, limited information sharing	Tacit information sharing
Adjusting actions	Joint funding, policy and projects	System change
Autonomous goals	Semi-autonomous goals	Interdependent goals
Own resources	Shared resources for project	Pooled, collective resources
Commitment to own agency	Accountability and commitment both to own agency and project	Accountability and commitment both to network
Short term relational time frame	Medium term relational time frame, based of previous projects	Longer term relational time frame (3-5 years)

Table 1. *The Relationship Continuum*
(Keast and Mandell, 2014; p.14).

Cooperation constitutes voluntary, informal operational partnerships; *coordination* is often project-based, more formal and founded upon prior relationships and experiences; *collaboration*, finally, has a strategic orientation, is principle-based and characterised by collaborative ideals, innovative drives and deep acknowledgement of reciprocal interdependencies. Collaboration, however, requires high levels of trust between operatives, which organisations often safeguard by imposing complex, formal governance via *convenants* and formal steering committees. As any alliance should be as complex as the problem it deals with (Avina, 2011), portrayal of FISPs as collaborative networks may be over-optimistic. In practice, partners may easily find ambitions of integrated, mutually dependent relations too cumbersome or risky in the light of other interests, relations and responsibilities. The SCTF is therefore best seen as a means of structured coordination.

Culture

Management of networks, by definition, is challenging as they accommodate interaction between agents of organisations that each have different idiosyncratic structural and cultural settings (Vangen and Huxham, 2013). Apart from structural conditions imposed by formal regulations, organisations are defined by duality of their structure, which depicts that social practices are simultaneously enabled and restrained by structural and cultural conditions in organisations. At the collective level, these conditions overlap work and ethical climates and define habitual ways of social interaction, required to provide stability, boundaries and meaning to human behaviour in organisations (Giddens, 2013; Schminke, Ambrose and Neubaum, 2005). Relational signalling considers individual behaviour and attitudes as guided -though not determined- by structural conditions and social rules in organisations and their proximate contexts (Six and Sorge, 2008). This offers supra-individual explanations for behaviour and

attitude as the effect of *logics of appropriateness*, behavioural patterns shaped in accordance to acceptability rather than rational choice (Koppenjan and Klijn, 2004).

Culture is the abstraction of social learning, shaped on three levels: visible structures and social environments; espoused beliefs and values; and intangible basic underlying assumptions (Schein, 2010). The latter, most deeply embedded and powerful element is prominent in longer-established social settings, and fosters unconsciously learned responses, and accepted perception-patterns. Contrary to values, basic underlying assumptions are non-negotiable and difficult to change. They provide a sense of “cognitive stability” (Schein, 2010; p.29) and group identity, which nurtures trust that other group members behave with integrity (in accordance to shared values) and benevolence (committed to mutually beneficial goals) (Williams, 2001 as cited by McEvily, Perrone and Zaheer, 2003). Such psychological-cognitive defence mechanisms support group survival, but can also cultivate over-identification, distrust of non-group members and countenance of alternative views (McEvily, Perrone and Zaheer, 2003).

Psychological notions of value congruence capture that individuals sharing values and beliefs, share comparable cognitive processes, interpretations and means of communication (Schminke, Ambrose and Neubaum, 2005). Professional communities therefore easily form closely-knitted subcultural webs cutting across existing organisational settings (Meerts, 2018; Schein, 2010). In the financial-crime field, connections established on professional or educational parallels over the public-private spectrum, formed the basis of many a PPP in this field. Corresponding esoteric expertise, serendipity and universalistic values between typically task- and result-oriented professionals, led to institutionalisation of expertise, which, in sociological terms, defines professional cultures (Wakefield, 2014; Avina, 2011). “Trust transfer” (McEvily, Perrone and Zaheer, 2003; p.94) thereby asserts that cultural similarities institute willingness to transact in a collective without the requirement of pre-established personal relationships. One common way to address tensions in networks is by simplifying cultural diversity. This explains that due to dependence on professional-cultural networks, FISPs have remained small-scale operations.

Agency defines how individual actors, whether on operational or governance levels, divide orientation between the network and their own organisation, or put differently, between autonomy of the partnership and accountability to existing loyalties (Vangen and Huxham, 2013). Schneider’s (1997 as cited by Six and Sorge, 2008) principles of attraction, selection and attrition highlight tendencies within occupational and professional cultures to attain homogeneity of personality and matching professional beliefs, competencies and skills (Mandell and Keast, 2008). In this light, idiosyncratic differences in

organisational structure, culture and motivation of banks versus law enforcement agencies, seemingly making them “strange bedfellows” (Avina, 2011; p.284) in FISPs seems less odd. Vangen and Huxham (2013), however, argue that tendencies to use attrition to connect similar cultures in networks may be useful to manage interpersonal cultural complexities and frictions, but obstruct the creativity needed to accomplish collaborative advantages, which causes opportunity costs.

Common goals

Networks must generate demonstrable outcomes to justify their existence (Prenzler and Sarre, 2012; Van Gestel and Verhoeven, 2011). Despite Maxwell and Artingstall’s (2017) argument that non-standardised, principle-based FISPs produce better results than the standardized regulatory approach, FISPs do not operate on an industrial scale, as they generally only deliver advanced specialist capability.

A network’s synergistic advantages are determined by diversity in expertise and resources from various partners. This, however, is prone to goals-paradox, whereby divergence or ambiguity of goals can obstruct the development of effective relationships (Vangen and Huxham, 2013; Mandell and Keast, 2008). Vangen and Huxham (2013) argue that the goals-paradox lies divided over six dimensions: *level* distinguishes between collaborative goals, organisational purposes, and individual aspirations; *origin* captures the influences on goal-setting of incentives of organisations and external influences, such as pressure exerted from political priorities or personal interests; *authenticity* regards that partners sometimes identify with pseudo-goals imposed by external pressure, or by individuals legitimising or rationalising personal incentives; *relevance* relates to the challenge of distinguishing between collaborative agendas and other, closely related, goals; *content*: goal-setting often only expresses *how* cooperation is undertaken instead of defining actual performance-metrics; and, most important in the light of this study, *overtness*: transparency versus opaqueness about interests and incentives, notwithstanding goodwill.

Even though complexities of networked cooperation can delay delivery of results substantially, goals provide measurement for performance and accountability towards partners’ returns on risk and investment (Anklam, 2007; Mandell and Keast, 2008). Network perspectives are related to sociological and cognitive approaches (Koppenjan and Klijn, 2004), committing partners more to the network when goals and prospected outcomes are believed to be meaningful, worthwhile and achievable.

As no single organisation controls the outcomes of networked cooperation (Rhodes, 2007), all participants must be ready to accept risk, which becomes more manageable within a small scope. Why? First, partnerships provide access to vested interests normally protected by varying levels of

confidentiality (Van Steden and De Waard, 2013). If access to information is not regulated, risks of exposing law enforcement operations, disproportionate violations of privacy or involuntary competitive advantages might be induced. Secondly, whereas network participants typically entail distinct professional-cultural representations, awareness or even support in their organisations for networked cooperation is often limited to insiders (Mandell and Keast, 2008). This makes that conflicting or divergent interests between partner-organisations, outside the network, remain conceivable. However, any hint of absolutism in legal, regulatory or contractual matters will be detrimental to the plausibility of a network's socially engaged narrative, and must be avoided (Flinders, 2005).

PPPs tend to engage established, reputable private institutions for their resources or stakes, such as accounting for a majority of STR reporting, or a customer base representing large parts of the population (Maxwell and Artingstall, 2017). Networks thereby risk that these interests come to prevail over other interests (Shearing and Wood, 2003; Flinders, 2005). Associations with opportunism must be avoided by a narrow scope, concentrating on matters wherein business, government and public interests are aligned. This may also cause tensions, as the common good is nonexcludable and nonrival by definition, i.e. it imposes egalitarian benefits for all, provided by the investments and risk-taking of a few (Rufin and Rivera-Santos, 2012).

Shared values

The substantive purposes of PPPs embody shared values, such as belief in the democratic rule-of-law as essential societal conditions for people and businesses alike, whereby crime constitutes social risk opposing these values (Kytte and Ruggie, 2005; Hardouin, 2009). To banks, crime incurs reputational consequences when impacting stakeholders, such as investors, clients, staff or civic society -including its institutions. Throughout the literature it is contemplated that the stakeholder-perspective will incentivise banks to take active roles in crime prevention, as it neatly fits both Corporate Social Responsibility (CSR) and Compliance programmes (Hardouin, 2009; Garriga and Melé, 2004; Avina, 2011). The fear of negative reputational association with crime, however, dampen banks' buy-in to networks, as to avoid confusion with attempts to correct or mask wrongdoings (Avina, 2011). Whereas corporations usually thrive in public-relations, some deeply-rooted legalistic reflexes render preferences to avoid publicity about regulatory matters more common (De Oliveira, Keatinge and Stickings, 2016).

Aforementioned ING case, nevertheless proved that keeping a low risk-profile is counter-productive when it is confused with arrogance or ignorance towards important social matters (Heijn, 2018).

Brinkerhoff and Brinkerhoff (2011) argue that partnerships are value-laden, useful to promote moral legitimacy and maximize appeal of partners by depicting their operations as desirable, fair, and

appropriate within social norms, values and expectations (Crane, 2010). Under that narrative, PPPs tell the story of organisations' contribution to the common good, and adherence to ethical standards, providing opportunity to polish the financial sector's tainted image, and adjust normative assumptions about the public good as an exclusive government-domain (White, 2014). Both are necessary steps towards collaboration, if done tastefully, tentatively and truthfully.

Trust

Before FISPs produce results, integral functions of inclusion, equity, transparency, accountability and ethical behaviour must be established (Bovaird, 2004, as cited by Brinkerhoff and Brinkerhoff, 2011), or in sum: trust.

Though inherently fragile, trust is considered a prerequisite for cooperation, which simultaneously occurs on inter-personal levels and inter-organisational levels (Vangen and Huxham, 2013). Trust in the partners, mechanisms, and capabilities of the network, decreases transaction costs in terms of time and effort spent in the interactive exchange of information between partners, especially when compared to one-directional STR reporting and court-orders. In inter-disciplinary information-exchanges, trust that the information source took the receiver's interests into consideration, constitutes presumptions about the importance, relevance and veracity of conveyed knowledge, and enables more immediate interventive action or generation of subsequent additional knowledge (McEvily, Perrone and Zaheer, 2003). Repeated mismatches between trust and trustworthiness impose opportunity costs: the network's missionary ambitions will be decimated when opportunistic actors are trusted, or when latent trustworthiness remains under-utilised.

From a psychological viewpoint, trust relates to acceptance of risk, uncertainty and vulnerability based upon positive expectations that other partners refrain from strategic (i.e. longer-term) or myopic (i.e. short-term) opportunism (Koppenjan and Klijn, 2004). Its inherent heuristic qualities make that trust lacks precise measurement of relational qualities. It depends on constant assessment of the equilibrium between actual and perceived intentions of trustees, or as McEvily, Perrone and Zaheer (2003; p.93) put it: "Without trustworthiness, trust is not sustainable". Trust thereby exists at trustors' perception levels, who look for two dimensions of relational signalling in trustees' behaviour: at the *ability dimension* of trustworthiness the trustee must show competence to perform according to expectations, at the *intentions dimension* the trustee's behaviour indicates interest in maintaining a relationship with the trustor (Six and Sorge, 2008). Trustworthiness constitutes a social phenomenon not only related to inherent qualities of individuals or organisations, but also allowing them to regulate trustworthiness, depending on their games and stakes (Koppenjan and Klijn, 2004; McEvily, Perrone and Zaheer, 2003).

The key to solving a wicked problem like professional money-laundering lies encapsulated in non-redundancy, by combining differentiated capabilities, unique qualities, assets and network positions, not in merging them (Keast and Mandell, 2014; Koppenjan and Klijn, 2004). Structural conditions, such as density, stability and multiplexity (i.e. potential for organic expansion) of networks are affected by the development of trust among actors during formal and informal interactions (McEvily, Perrone and Zaheer, 2003). As interdependence, alignment of interests and uncertainties complicate goal-attainment, trust can therefore be regarded as an organising principle, offering conceptual logic to explain how interaction-patterns and coordination of work are shaped in networks (Vangen and Huxham, 2013). Indicative for the existence of trust in networks are inclinations to find reasonable explanations of failing performance instead of explaining fall-backs as ill-intent or self-interest of other partners (Koppenjan and Klijn, 2004).

Cultivation of trust as an organising principle requires acknowledgment of relational intricacies as essential abilities to maintain working practices and rules, which requires leadership to envision and facilitate socialization as a core normative structure (Six and Sorge, 2008; Mandell and Keast, 2008). In networks stimulation of trust through leadership is either achieved via the *small-wins* approach (Bryson 1988), building trust by gradually increasing positive experiences of lower-risk achievements; or, in circumstances of great urgency or ambition, wherein partners are willing to accept greater uncertainty, by explicit and conscious regulation of opportunistic behaviour (Vangen and Huxham, 2013).

Games and rules

Another relevant perspective on relational strengths, in line with notions of trust and trustworthiness, is offered by Koppenjan and Klijn (2004), who posit that shared values, common goals provide structures required mark out and manage the inevitable, inherently dynamic balancing-acts of aligning various organisational and sectoral interests. These *games* influence network stability, especially when played over various arenas (e.g. regulatory enforcement vis-a-vis crime prevention). Networks are sensitive to radical change, either caused by games or by unforeseen developments within partner organisations (Vangen and Huxham, 2013).

Like cultural diversity, Brinkerhoff and Brinkerhoff (2011) consider distinctive identities of organisations instrumental to the success of networks, as they define partners' capabilities, confidence and self-image (Veenswijk and Hakvoort, 2002). Network logic, nevertheless, remains inherently unpredictable (Giddens, 2013). The network's policy belief system (Sabatier, 1988, as cited by Koppenjan and Klijn, 2004) accumulates espoused beliefs and values (Schein, 2010), which define the *rules* that provide stability and predictability. Rules are procedural in nature by defining what is accepted and

allowed, for instance by indicating to whom opportunities, such as access to classified information, apply (Koppenjan and Klijn, 2004). Analysis of network rules may provide footing for evaluation and further research (Sydow, 2004).

In networks, all partners remain accountable and responsive to their own missions, obligations, reputation and comparative advantages (Mandell and Keast, 2008). Comparing dimensions of organisation identity and mutuality provide measurement of the network's characteristics; e.g. communalising collaboration (high organisation identity/high mutuality) versus hierarchical cooperation (high organization identity/low mutuality), or induced responsabilisation concepts (low organization identity/low mutuality) (Brinkerhoff and Brinkerhoff, 2011; Rhodes, 2007).

Targeted acculturation processes in collaborative networks can mould networks into fields, i.e. domains of social interactions held together by mutual stakes and their own distinct logic (Leander, 2009). There are, however, risks attached to overly strong policy belief systems and cultural homogeneities. Such "*iron triangles*" (Koppenjan and Klijn, 2004; p.98) close networks to stakeholders with different perceptions or interests, and provide small, democratically unrepresentative coalitions with much influence (Flinders, 2005), or can induce heuristic biases that reduce the likelihood of knowledge exchange between less like-minded experts, thereby limiting the potential for progress and the development of synergetic advantages (McEvily, Perrone and Zaheer, 2003).

5 Research Methodology

Quantitative and qualitative paradigms propose seemingly opposed epistemological positions, whereby the first encompasses hypothetico-deductive, positivist approaches (Noaks, 2004; Rawlinson, 2008), and the latter paints an interpretative, contextual -constructivist- picture. The study was conducted in line with Pratt's (2009; p.856) recommendations that qualitative research is appropriate to address questions of "how" instead of "how many". The epistemological position of this qualitative research falls within interpretative paradigms of postmodern constructivism by providing means to contribute to knowledge of social and institutional contexts of networked-cooperation (Mandell, 2013).

Despite the number of variables, this type of qualitative research can only produce abstractions from complex inter-organisational interaction by offering representations of reality through the eyes of participants, and by adding meaning to their experiences and behaviour within the complexity of this context (Noaks and Wincup, 2004; Henwood and Pidgeon, 1992). This aligns with the study's exploratory, interpretative objective to explore whether and how inter-organisational and social factors influence the efficacy and practicability of the SCTF, since the way people or groups socially construct their world, affects the way they perceive reality and interact (Henwood and Pidgeon, 1992).

Data Collection

Deductions from theory and formal roles and responsibilities of various organisations were used to formulate semi-structured, open interview questions (Appendix H) to collect data on prevailing attitudes and complexities surrounding networked interaction throughout different (types of) organisations. Semi-structured interviews were preferred over structured interviews or online surveys as suitable tools for small-scale exploratory research (Fielding and Thomas, 2016). Interview questions were used to elicit respondents' experiences, visions, perceptions and attitudes towards PPPs in general and the SCTF in particular.

To safeguard the research focus, interview questions were categorised into four themes (political/societal, legal/regulatory, organisational-cultural and occupational-cultural) and around three prerequisites (shared values, common goals, trust and leadership). Prior to the interviews it was estimated how interview-questions would invoke answers towards themes (Appendix H).

The researcher deemed it conceivable that senior managers involved with network formation, are best positioned to provide strategically-oriented views representative for the prevailing attitudes and interests of their organisation. Individuals positioned lower in the hierarchies are typically involved in

network operations and are thereby expected to be inclined towards expressing personal opinions and anecdotes encompassing attitudes towards cooperation *in* their organisations. As the research depended on tapping into experiences of individuals holding both decision-making powers and in-depth knowledge of anti-money-laundering strategies, and formation of PPPs -of which there are few-, purposive sampling was used (Cronin, 2016). Respondents hold positions equivalent to '(deputy) head of department' under various job-titles within different organisational hierarchies. Exact job-titles are not given as not to jeopardize anonymity.

To safeguard analytical reliability and validity, the researcher sought to ensure a representative balance between respondents from different types of organisations. Eleven respondents were invited. Ten agreed to participate, one -representing a private organisation- did not respond. Data were collected from six respondents representing four public organisations (Police, FIOD, FIU and OM) and two respondents from two private organisations (Rabobank and ABN AMRO bank). For reference, data were collected from two respondents of non-participating, though knowledgeable stakeholders (Dutch Central Bank and Europol).

In-person interviewing provided opportunity to discuss more tacit and sensitive matters and allow additional themes to emerge, which might have remained underexposed when using other methodologies. As data was collected by audio-recordings, it could be reproduced in full and allowed the researcher to engage with the respondent without being distracted by note-taking (Fielding and Thomas, 2016). The semi-structured approach left room to cultivate natural discourse between interviewer and interviewee, providing opportunity to leave questions out, change the order of questions, repeat questions, or ask additional questions when further clarification was deemed necessary. This approach helped to achieve the desired analytical depth by increasing the quality of data obtained and allowing additional themes to emerge from the data.

Research ethics

Permission to conduct the research from ABN AMRO's Head of Security & Integrity Management (Appendix C), was received on 4 December 2018, under the following conditions:

- Before submitting the research paper to the University of Leicester, it is to be reviewed internally to ensure no confidential or sensitive information concerning ABN AMRO; other SCTF participants; or other PPPs involving ABN AMRO is shared, as to safeguard the reputation of ABN AMRO, or expose identities of participants involuntarily;

- The research outcomes are not to be published. They are to be used exclusively for the purposes of the dissertation and to advise the SCTF steering committee.

In accordance to ethical standards provided by the British Society of Criminology (2015), the researcher sought to minimise risk of potential harm to respondents, by incorporating two key ethical measures to devising the interviews and analysis: informed consent and anonymity. After ethical approval (Appendix A) was granted by the University of Leicester on 9 January 2019, participants were approached via e-mail (Appendix D), either directly by the researcher, or -if participants were outside the researcher's network- by ABN AMRO's head of Security & Integrity Management. The e-mail introduced the researcher, the research questions and delineated how the SCTF may benefit from the research.

After the initial email, interested respondents received an invitation and an Interview Consent Form. These forms provided additional guidelines and detail about participation and other aspects of the study, including anonymity, and possibilities to withdraw. This allowed respondents to make an informed and voluntary decision about participation. Potential respondents were requested to acknowledge consent by signing the appropriate Interview Consent Form (Appendices E and F) prior to their interview. In line with the ethical approval's conditions, respondents in gatekeeper positions were approached first. All except R008 (Europol) -who confirmed approval of his organisation via separate e-mail- indicated they were gatekeepers, and signed consent form 1. R008 signed consent form 2.

After written consent and approval was received and documented, interviews were scheduled between 14 January and 20 February 2019 (Appendix G). During analysis, the researcher safeguarded anonymity by replacing all identifying features, such as names and positions of respondents with arbitrary number combinations (Boddy, 2016), ordered chronologically R001-R010 by interview date. The researcher ensured no quotes are reproduced that can be used to deduce identities or positions of respondents. The researcher refrained from asking respondents to reveal sensitive or confidential information regarding matters related to ongoing criminal investigations, STRs, competitive advantages, or supervisory action.

Analysis

In order to synthesise both overt and more latent or tacit aspects of inter-cultural and inter-organisational interaction, a straightforward analytical approach of qualitative data analysis through deductive reasoning provided a suitable tool to make valid inferences from the data. From the interview recordings and notes, the analysis identified how attitudes towards networks develop from structural organisational conditions and cultural propensities, and how these influence interaction-patterns in

taskforces; and *vice versa*, how these conditions may shape cooperation over time (Koppenjan and Klijn, 2004).

For this explorative study, network theories provided heuristic models to structure data and deduce themes. The main theoretical body used to code the data was the Theory of Collaborative Advantage (TCA) (Vangen and Huxham, 2013; Huxham van Vangen, 2005) which provided a comprehensive view on interactions in networks, highlighting dimensions of goal-congruence, trust-building, structural conditions, cultural diversity and leadership. Another theoretical perspective was Network Governance Theory which conceptualises game-playing in networks (Koppenjan and Klijn (2004). General social theory, such as Bourdieu's Theory of Practice (Pouliot and Mérand, 2013; Leander, 2009) and Levels of Culture theory (Schein, 2010), provided frames explaining how, at the confluence of habitus and field, mental processes of decision-makers within various organisations take shape.

Pre-analytical coding (Fielding, 2016) via a self-designed coding framework in Microsoft Excel (Appendices I-S), was used to filter the data, in order to identify relevant variables stemming from the TCA and other social, network and organisational theoretical constructs. Given the problem of "network theory confusion" (Keast, 2013; p.16), mentioned in the literature review, the analysis allowed other themes – i.e. patterns of explicit and implicit content (Joffe, 2012)- to emerge from the data when the analysis indicated recurring features, patterns, and qualities of inter-personal and inter-organisational interaction relevant for the research-scope (Willig, 2014). An example thereof is *scale*, introduced by R003, R004, R007, R009 and R010.

Limitations

One limitation in connection to the chosen methodology, is that data-collection relied on the opinions and experiences of respondents, whereby measurement of personal opinions can involve degrees of subjectivity. Purposive sampling was used to mitigate this risk. Furthermore, criteria of validity and reliability brought forward by constructivist paradigms, may have been influenced by confidentiality, anonymity, and general lack of consensus over such criteria for qualitative studies (Rawlinson, 2008). An idiosyncratic characteristic of network theory is exhibition of a descriptive rather than an explanatory focus (Keast, 2013), which may have limited the analytical depth somewhat. Given its exploratory nature, this is not regarded problematic as the present study's credibility lies encapsulated in its abilities to provide a foundation for broader-scale future academic research.

The inherently different viewpoints of various organisations render it unrealistic to expect that beliefs and perspectives of respondents would be homogeneous, or even harmonious. Prior to data-collection,

positions of various respondents were expected to be divergent. Analytical focus on themes provided confidence that sufficiently robust answers to the research questions could be derived from the data. The sample size might, however, prevented generalisability of the outcomes outside the set scope of Dutch finance-security assemblage, which may have influenced the validity of the analysis. Given the study's explorative nature, available time-frames, and availability of knowledgeable senior-level respondents, only a small sample size was deemed feasible.

The semi-structured interview-approach provided the researcher liberty to prompt variations during questioning, which may have affected consistency. Although focus remained uniform across all interviews in order to enable comparative analytical consistency, the interview questions were designed as topic-lists to structure interviews against themes, not to ensure completeness (Fielding and Thomas, 2016). Even if the same interview-questions were presented, responses may have been affected by different interpretations thereof. Given the researcher's experience in conducting and transcribing interviews, both as a former police-detective and a corporate investigator, the risk of misinterpretation and loss of scope was deemed limited.

Some data may have been affected by the fact that five participants were already in the researcher's existing professional network, and were aware of the researcher's professional background, position and subject-matter understanding. The positive effect thereof, was that rapport between interviewer and interviewee was easily established, ensuring participants felt free to provide detailed and pronounced accounts from their own perspective. On the other hand, participants either might have been opportunistic or tentative in sensing possibility to better position their (organisation's) interests.

The researcher's professional background and understanding of the subject should be assessed in the light of reflexivity, whereby analytical interpretations are formed by a researcher's own beliefs and objectives (Gilbert and Stoneman, 2016). To avoid that data-collection matched pre-conceived theoretical or personal assumptions, the researcher consulted his dissertation supervisor and asked his proof-reader for reflection to ensure interview questions did not invoke "socially acceptable responses" (Fielding and Thomas, 2016; p. 290), or echo epistemological biases (Willig, 2014).

Finally, language variations may have influenced the coding process. The researcher interviewed all respondents, except R008, in the Dutch language to ensure natural discourse and mitigate risks of leaving material topics undiscussed. Interviews were transcribed directly into English language coding-tables (Appendices J-S), using verbatim sound recordings as a reference. The researcher's command of the English language is sufficient to ensure correct reproduction of relevant data.

6 Analysis and Discussion

This chapter presents the findings emerging from deductive thematic content analysis of semi-structured interview data. Interviews provided sufficiently detailed data to achieve the desired analytical depth to address research questions 1 and 2, though could cover research question 3 only superficially.

Analytical frame

The present study seeks to contribute to existing knowledge of intensified networked cooperation, by offering a representative -though not comprehensive- outlook on strategic-level decision-makers' perspectives, perceptions and considerations during the early stages of network formation. The study's main theoretical perspective is Vangen and Huxham's (2013) Theory of Collaborative Advantage, which conceptualises the management of cultural diversity, goal congruence, trust-building and leadership in networks, extended to the SCTF's setting.

Appendix I provides an indicative oversight over the relative positions of respondents' perceptions and attitudes towards intensified public-private cooperation in this field. As no quantifiable data were processed, this part of the analytical frame offers a strictly heuristic model created to support the discussion, but is insufficiently detailed to draw immediate conclusions from.

The analysis focused on the relations between three themes (political/societal, legal/regulatory and cultural conditions) with three pre-identified prerequisites to successful cooperation (common goals, shared values, trust). Additionally, the analysis allowed other themes to emerge from the data when three or more respondents identified them as particularly important. Analysis of the SCTF formative stages provided insight into how respondents' motivations during network formation are shaped by institutionalised attitudes, organisational interests and proximate influences. The analysis identified three additional themes:

- Nine respondents pointed out the importance of **leadership**. This notion corresponds with Vangen and Huxham's (2013) Theory of Collaborative Advantage, and was considered in the analytical frame;
- The notion of **effectiveness** of the regulatory framework was mentioned by six respondents. Effectiveness was assumed to be an exponent of confidence in both the regulatory framework, and commitment to finding new abilities of achieving pre-defined synergetic outcomes in the SCTF. Effectiveness was analysed in parallel to the prerequisite of *common goals*.

- Five respondents mentioned that potential practicability and feasibility of the SCTF requires a small-scale setup.

Organisational perspectives towards intensified cooperation

This section seeks to synthesise answers to research question 1; how political, regulatory and cultural conditions influence willingness to engage with partners. The analysis -tentatively- indicates the existence of a relation between the political/societal theme and common goals.

Societal/Political Influences

The analysis showed that willingness to engage in PPPs is influenced by proximal external occurrences tapping into organisations' formal positions and responsibilities. Eight respondents underlined the importance of the ING case on the political and regulatory climate, and public opinion in the Netherlands (Openbaar Ministerie, 2018). Perceptions about the case's effects differ throughout the public-private divide. Whereas R009 (bank) saw it as a *"game changer"*, R001 (police) stated that although the ING case may be influential, *"for us, once a case like this is settled with the prosecution, it is over and done"*.

R005: *"Apparently something has to happen first to make people aware that cooperation is needed and has added value"*.

R007: *"I secretly hope that the after-effect of the ING case will be that compliance is no longer only a topic, but rather an actual person in the board-room"*.

A side-effect of the ING case, according three respondents, might be that PPPs present a narrative to prove how seriously banks take their responsibility as gatekeepers, by illustrating commitment to extracurricular efforts to help counter crime, such as the TFTF and SCTF.

R006: *"what I do like about the current debate... is the increasing attention for our gatekeeper-role. It is becoming clearer to the public how much work is being done by the banks... It makes clear how little people understand about money-laundering"*.

R003: *"many organisations wish to position themselves because they realise ... PPP is the next big thing. This places current initiatives in a political light and makes the SCTF discussion so incredibly complicated"*.

R009: *“Banks have a challenge ahead of them, maybe not towards the public parties, but towards the regulator, because banks too often have shown they are not even able to adhere to basic legal requirements. How credible are they then in taking the next step?”*

The data suggests a relation between the political/societal theme and the prerequisite of goal-congruence. This connection indicates the probability of a goals-paradox in the SCTF, engendered by tensions between congruence and diversity of various interests (Vangen and Huxham, 2013). As partnerships' ambitions are fitted into existing legal frameworks, networks are strongly influenced by the origins of interests of dominant stakeholders. Especially political-administrative factors exert pressure on PPPs constrained by public opinion or mandated to cover social or political priorities, such as undermining crime. R008's personal opinion was that *“regulatory enforcement prevails”* as departmental agendas of Ministries of Finance always dominate over law enforcement priorities.

Goals-paradox furthermore affects the authenticity of goal-formulation, in the event that participants express desired or expected positions they do not genuinely identify with (“pseudo-goals”) (Vangen and Huxham (2013, p.54). Interests of organisations are thereby not always clearly formulated, or sometimes even denied.

R010: *“The private side, does not always feel at liberty to express their interests, because their interests may not be fully aligned with the public interest. This can be a delicate matter, especially when a private party, like the banking sector, is under pressure”*.

In the spirit of commitment to the shared problem-orientation, networked arrangements are based on “mutual commitment” (Brinkerhoff and Brinkerhoff, 2011; p.3), that institutes some degree of shared control, risk and responsibility, and (some) equality in decision-making and control. Adherence to pseudo-goals, however, can lead to lack of commitment to the collaborative agenda and low degrees of mutuality. Vangen and Huxham (2013) argue that goals-paradox renders it unlikely that goals will ever be in harmony and even question the practicality of shared goal-setting as a prerequisite to successful cooperation.

R004: *“Cooperation is a constant dynamic between giving and taking. If it were giving without taking, things become complicated, then you need a 'big heart' It is important that all participants are heard”*.

Two respondents provided an original perspective on societal/political interests, which may indicate existence of pseudo-goals. They explained that intensified intelligence-sharing can be politically sensitive as it questions the effectiveness of FATF's risk-based approach to money-laundering, which

(R003): “*could affect the Netherlands' FATF evaluation in 2021*”. This interest was not mentioned in the SCTF's preparatory documentation (Openbaar Ministerie *et al*, 2018), but might become a factor of influence under the reality of existing political-administrative relations (Koppenjan and Klijn, 2004).

R004: “*although the FIU formally is part of the police, it ... operates under auspices of the Ministry of J&V. So, the minister is on top of it. If he grants the article 20 WPG-decision he acknowledges the risk-based principles are not working. The Pavlov-reaction may be that the SCTF-initiative is causing a problem, so you must explain that sharing tactical information is process-optimisation ..., not something new*”.

Legal/Regulatory Influences

The study explored how (perceived) boundaries of laws and regulations, and the interest and positions of organisations shape games (Koppenjan and Klijn, 2004). Interview questions 1c, 1d and 1e (Appendix H) were designed to invoke reactions about respondents' perceptions and beliefs in the regulatory system's crime prevention mechanisms. Although all respondents commented on this, little consensus existed about the effectiveness of regulations. R006, from a business-administrative perspective, called it: “*piss poor*” as the regulatory system mismatches the availability of information vis-a-vis the distribution of its workload. R004 considered the regulatory system “*for the most part effective*”.

As it emerged clearly from the data, confidence in the regulatory system's effectiveness, seems indicative for the motivation and commitment of respondents to develop new and innovative ways of working together. Respondents' viewpoints about regulatory effectiveness lie divided over three dimensions. First, fundamental tensions formed by the political disconnect between the regulatory system's espoused aspirations and grounded realities of crime prevention (Gallant, 2014):

R001: “*To us crime is the most relevant factor... I hope our involvement in taskforces will improve the system, but this is not our priority*”.

R002: “*No, I don't believe the people we are after are hindered by regulations*”.

R006: “*In the past I had a hard time explaining why we have a role in detecting crime. Those days are over, but mostly because the system is unsustainable*”

Secondly, responsabilisation of the private sector as gatekeeper:

R003: *“Does it work? Of course, it does. If non-reporting is prosecuted, ... it makes regulated entities aware of the consequences... There is nothing wrong with having a stick at hand, besides a carrot ... to ensure the Barrier-model works”.*

R007 (relating on ratios between STRs and law enforcement response): *“in my opinion this is poor reasoning. ... [STRs] always lead to enhanced awareness ... [and] contribute to our strategic analyses”.*

Thirdly cooperation as a means to improve efficiency.

R009: *“If institutions suggest they should be enabled to save costs by scaling down other CDD or TM operations, because of their participation in a PPP, I can understand that suggestion, but I consider it cheap”.*

R010: *“this form of cooperation will produce more signals requiring analysis... We hope that it will provide better insights, but I doubt if the process becomes more efficient”.*

Most respondents pointed out some perceived benefits of enhanced information-sharing, although taken together it seems conspicuous that the dominant reaction about these advantages is encapsulated in the ability to create more learning loops to improve the existing regulatory system. Safe respondents from the police and OM, few others specifically related to the advantages of tactical-level information sharing (Track 1) such as speeding-up procedures, increasing confidence in the quality of information and improving possibilities for interventions, despite it being the SCTFs most distinctive feature.

R003: *“The added value of the SCTF is ...changing the focus of money-laundering prevention towards establishing a more complete picture of criminal money-flows, thereby identifying truly influential intermediaries and key persons, not the small-time stuff”.*

R005: *“from our perspective, focus on phenomena is more valuable than sharing tactical information”.*

R010: *“Extrapolation from Track 1, via Track 2 to integration in regular processes, or into the TM-Utility will yield benefits”.*

Respondents broadly supported that privacy regulations impose challenges to the SCTF, especially in relation to Track 1. Looming fines and ambiguous guidance over potential privacy violations seem to

influence organisations' risk appetite when engaging in information-sharing partnerships (Kolthoff and Khonraad, 2016; De Oliveira, 2016). Most respondents had difficulty determining when money-laundering indications are severe enough to violate privacy-rights. According to R007, the severity of the crime-problem determines organisations' choices, by stating that creating the rationale for the TFTF was easier than for the SCTF:

R007: *"as terrorism is at the extreme end of the spectrum, no reservations applied in that cooperation"*.

R003: *"I don't like the term 'undermining crime' because it is hyped, but all WPG requests should include forms of crime that impact social structures or human dignity, such as human trafficking. ...[to] mark out proportionally thresholds"*.

R009: *"you will need a privacy violation to determine if it is justified to violate someone's privacy"*.

R008: *"One good safeguard is that [information-sharing] is done at an intelligence level, ... not used as evidence"*.

R006: *"My adage is 'share more, use less'.... We must convince [the privacy regulator] that cooperation imposes less privacy risk..., [when] many parties, from many different disciplines, expertise-[areas] and viewpoints look at the same data, chances you are wrong will decrease significantly. This will institute much higher levels of proportionality"*.

Cultural conditions

Interview-questions 2c-g explored culturally-defined perception-patterns towards information sharing and cooperation in organisations, which can create discrepancies between pledged and active network-participation (Van Gestel and Verhoeven, 2011). Respondents thereby mainly related to cultural levels of visible structures and espoused beliefs and values (Schein, 2010).

R005: *"'Together' is prominently mentioned in our strategic goals"*.

Organisational-cultural conditions seem tied to the prerequisite of shared values, which is closely related to ideas about organisations' formal mandates and traditional roles. Since most time was spent discussing more rational dimensions of crime prevention, regulations and collaboration, little reference was made to basic underlying cultural assumptions (Schein, 2010).

R010: *"[In] the Dutch culture, [we tend] to discuss matters on a rational, formal level."*

Some respondents presented organisational-cultural perspectives related to attitudes among *upper* ranks in their organisations. This provided outlooks into how established cultures and habitual perception-patterns create bounded rationality (Vangen and Huxham, 2013; Koppenjan and Klijn, 2004), for instance leading to persistent “*sentiments that a bank should not be a police-officer*” (R006).

R002: “*We are part of a bureaucratic, task-oriented organisation. Policy makers asking for more cooperation, are also the first to criticise it*”.

R009: “*the attitude of executives towards cooperation has changed. The intriguing question is whether their motivation is intrinsic, the effect of the ING case, or an attempt to keep up with the other banks*”.

The research assumes links between existing networks, occupational culture and the prerequisite of trust. Vangen and Huxham (2013) argue that cultural similarity yields connectivity, mutuality and value-congruence, but also negatively impacts the level of creativity and flexibility needed to generate synergetic advantages. The data indicated that network initialisation relies on existing relations and occupational-cultural similarities (McEvily, Perrone and Zaheer, 2003). Three public sector respondents confirmed that such similarities in participants’ backgrounds can be useful to establish trust during the early stages of network formation but are not required for a network’s longer-term viability.

R001: “*if[people] resemble each other too much, the added value of a partnership will be lost. Though it is easier and faster to reach consensus among people from the same occupational background, it is by no means a must*”.

R002: “*the SCTF is created by number of people who knew each other from the past.... This provided the basis for confidence in the SCTF’s outline and scope, but also the fun of being able to construct something we all knew would be difficult*”.

R005: “*The vulnerability of cooperation is its dependence on personal networks*”. *The difficulty lies in broadening this vision*”.

Prerequisites

This section provides answers to research question 2, by determining how respondents regarded the relevance of trust, common goals, and shared values in networks, as far as answers were not already provided in the previous section.

Common goals

All respondents were able to relate to the crime problem of professional enablers of money-laundering and put this in a political/societal context of undermining crime. Safe R008, all respondents related to the SCTF's mission of developing inter-disciplinary intelligence gathering and analytical capabilities.

R002: “[for the police] *targeting criminal facilitators is nothing new, we knew 20 years ago that some persons with a unique expertise are key to criminal operations*” ... “*the Netherlands has a unique position with this strategy. I may be able to explain this to my peers in Canada, the UK or the US, but otherwise most countries are still busy catching 'guys and kilos'*”.

R003: “*The SCTF's focus on ... criminal operations, that truly hurt society, justifies collaboration*”.

R007: “*People hauling contraband are easy to replace, as opposed to professional launderers. If we could target them, and for heaven's sake not only with criminal investigations, I believe we can disrupt organised crime more effectively. So, yes I am a believer in the SCTFs mission*”.

R006: “*I am in favour of the SCTF, but I am sceptical. Why? If [the SCTF's] target is high-end facilitators, we should know what to look for, while we know that our current monitoring scenarios are unable to identify them*”.

Common values

Although not clearly confirmed by the data, the literature assumes that commitment to leverage delivery of shared public and social benefits bring network participants closer together, and will create mutual goodwill (Keast and Mandell, 2014; Prenzler and Sarre, 2012). A possible connection between value-congruence and organisational culture could not be established, as only one respondent specifically related to values as a driving-force.

R009: “*Cooperation enables us to take up our role as gatekeeper more effectively*”. [This] “*is distant from the WWFT, which sets out basic requirements for processes and controls. This is much more about our own identity*”.

According to Vangen and Huxham (2013), cultural diversity in networks is a source of conflicting values and beliefs, while others argue that trust reduces the need for value-congruence by balancing-out understandings of various interests and beliefs during the course of an ongoing relationship (McEvily, Perrone and Zaheer, 2003). The data showed that considerations of values and trust overlap.

Trust

Respondents consider networks as complex in terms of governing underlying structural arrangements, conflicting interests and relationships. Although widely recognised, trust was not clearly defined by respondents, possibly due to its inherently intangible and heuristic qualities (Six and Sorge, 2008). Most respondents relate to accountability and transparency as prime attributes for the existence of trust, though acknowledge that these attributes lack in the current SCTF-setup. Vangen and Huxham (2013) argue that avoiding ambiguity and managing expectations about membership conditions are defining elements of trust.

Respondents confirm that fostering willingness to exchange information and develop shared insights and learning, in spite of uncertain conditions and outcomes, requires visionary leadership, open dialogue and active management of opportunistic behaviour (Mandell and Keast, 2008; Koppenjan and Klijn, 2004).

R001: *“it is absolutely necessary to show you are willing to make concessions to your own agenda”*.

R005: *“I consider cooperation the most challenging thing there is. Vulnerabilities, interests, transparency, all these factors come into play”*.

McEvily, Perrone and Zaheer’s (2003) suggestion that identification- or values-based trust mobilises interdependent organisations towards joint action, was not widely supported. As the previous section showed, respondents are aware of opportunistic risks and possible hidden-agendas. Many respondents value trustworthiness more than trust, whereby they seemingly regard trust as a rational arrangement. Paradoxically, in the context of existing personal relations and professional culture, respondents sometimes depicted a value-based, enlightened or even altruistic interpretation of trust. This can provide complications, because when trust-building is a goal in itself, opportunistic behaviour is difficult to manage via contractual agreements (Huxham and Vangen, 2013).

R007: *“you cannot collaborate if everything needs to be put in rules”*.

In line with the previous section, respondents agreed that trust correlates with existing interests and power-imbalances (asymmetries) in the security-finance assemblage. As R006’s response below

exemplifies, trust is not self-evident. Perception-patterns persist that cooperation between organisations with (partially) concurrent interests is complicated, or even imposes additional risks. Some concerns exist that cooperation may be intended to provide law enforcement more convenient and efficient ways to obtain information (Maxwell and Artingstall, 2017), or even target participating organisations.

R006: “[if we] *work towards achieving a common goal of a safer society, ... we also take risks, a proverbial Damocles' sword ... [since] the parties we cooperate with, such as the FIOD, will not absolute us from historical failures to report. That level of trust is very difficult to overcome*”.

Longer-term Developments

Although referred to by some, the research could not offer conclusive answers to research question 3, how interaction-patterns, games, perceptions, the formulation of rules, and outcomes of collaborative processes influence attitudes towards collaboration in various organisations over-time. This must be left to future researchers.

Most respondents referred to their earlier experiences with networked cooperation, though mostly limited themselves to anecdotal evidence. During data-collection some other networks, such as the TFTF (R003, R006, R007), the AMLC (R004, R005), the FIOD-Police Combi-team (R001, R002 and R005), and the TM-Utility (R003, R006, R009, R010) were discussed. R001 clearly pointed out the potential of the small-wins approach (Vangen and Huxham, 2005; Avina, 2011), by arguing that concrete results are best to convince organisations, most importantly its senior leadership, of the added value of cooperation.

R001: “*The ECTF’s participation in ... a manhunt against some highly prioritised criminals proved that ... the banks were able to produce the most relevant intelligence, on the shortest possible notice. This generated very positive PR for the ECTF within the National Police*”.

R006: “*...trust only develops after a while. That is what we experienced in the ECTF as well, if new parties join, or there are new partnerships, we always start the process anew*”

Scale

Waardenburg *et al* (2018) argue that the value of networked interventions in criminal opportunity structures, lies captured in a small scope. Although no consensus existed over synergies and benefits yielded by tactical information-sharing, three respondents agreed that this form of cooperation is only feasible on a small scale and under a narrow scope. Respondents indicated that, during a network’s early

stages, a sandbox-model wherein professionals can work out practicable solutions (Maxwell and Artingstall, 2017), is required before networks can be scaled up. Furthermore, the achievements of too-broadly scoped PPPs would no longer be discernible or measurable as tangible results of collaborative endeavours.

R003: *“Best is to draw a circle to determine the area wherein interests, values and positions parties overlap, and only concentrate on that area”*

R004: *“Think big, start small”*

R007: *“I believe things are best done on a smaller scale, to make them more manageable. This is what we see in the SCTF process, the ambitions are also hindrances”*

R010: *“By starting small, either via co-location or by concentrating on a small aspect of a problem, we can achieve a bigger effect”.*

A Shared Language

Finally, R010's remark regarding the importance of a shared language and management of expectations in inter-disciplinary networks seems valid. Although this notion did not unambiguously emerge as a theme, it was -in different phrasing- repeated by R004 and R007. Also, Huxham and Vangen (2005) acknowledge the importance of communication both as a governance instrument, and a tool to create identification with the network's purposes.

R010: *“if we can align our language, successful collaboration becomes feasible”*

R004: *“In the earliest possible stage of a project like the SCTF, ... roles and responsibilities must be crystal clear”.*

R007: *“the biggest risk for the SCTF would be if governance, control and processes were unclear”*

R010 mentioned that most misunderstandings are encapsulated in clear, unambiguous communication, which underlines the importance of developing a shared network taxonomy as early as possible. R010 illustrated this by describing how the first discussions regarding the scope and focus of the SCTF had led to dispute, which simply was an effect of the network's name.

R010: *“How much time we spend discussing [serious crime] before we realised it concerned only a small part of it!”*

A shared language helps synchronise and align various interests, perceptions and expectations. It is thereby related to goal-congruence, as the taxonomy not only defines terminology, but implicitly indicates how various participants perceive the problem. This helps in clarifying different interests, position, constraints and possible games. Secondly, a taxonomy provides basis for performance measurement, which requires qualitative formulation as financial bottom-line analysis or crime statistics generally fail to capture less-tangible synergetic qualities (Rufin and Rivera-Santos, 2012).

R010: "In the drive and energy that people feel, this is often forgotten, because it is not the most appealing part of the process. It requires contemplation and conscientiousness, choosing the right words, while all the time people just want to go ahead and catch criminals".

7 Conclusions

This final chapter summarises the study's key conclusions in relation to the research problem, how inter-organisational and cultural factors influence the initiative of setting-up the public-private network SCTF, aimed at improving intelligence-sharing about professional money-laundering. Its conclusions include advice about aspects of cooperation requiring management attention before the SCTF can be operationalised with any expectation of sustained survival.

The analysis found evidence that two closely-linked systems played key roles during the formative stages of the SCTF: the goals-paradox and persistence of bounded rationality. Although recognised among respondents, these aspects seem insufficiently debated during network formation. Inaccurate assumptions about roles, responsibilities, scope and goal-alignment may stand in the way of development of effective, sustainable and trusting relationships during the network's later operational lifespan. This can lead to loss of commitment or even breed future conflict between partners (Vangen and Huxham, 2013).

Vangen and Huxham (2013; p.55) regard "*hidden agendas endemic in collaboration*", to which the SCTF seems to form no exception. In response to Research Question 1, the analysis clearly showed that besides political influences, also public opinion, intra-organisational politics and strategic interests and incentives of organisations can uphold bounded rationalities. The study found that deliberate or unconscious game-playing (Koppenjan and Klijn, 2004) is more influential than initially anticipated or acknowledged.

Whereas the research indicated that existing networks are important, it confirmed that inter-organisational dependencies are mostly determined by formal positions, agendas and responsibilities under the existing regulatory regime (Enroth, 2013). This notion was further amplified by proximal factors, such as the effects of ING case. This indicates the existence of hidden- or pseudo-goals, whereby (some) organisations continue to prioritise their own interests and responsibilities over collaborative, synergetic advantages.

The research further supports that innovation creates new paradoxes. Policy makers and leaders in regulated communities recognise that partnerships no longer are extracurricular experiments but useful tools, also strategically and symbolically, that carry potential to support reaching greater magnitudes of both regulatory and law enforcement effectiveness. This expands the number and seniority of involved stakeholders, and thereby increases the complexity of governing PPPs. Networks thereby entered new arenas of organisational maturity and accountability. Consequentially, cooperation no longer remains in

the hands of like-minded professionals. Where the latter may see obvious advantages in sharing tactical data, their ideas might present ostensibly unfathomable risks and cognitive dissonance to decision-makers. This may limit willingness to support experimental collaborative sandboxes, without putting complex risk management, governance and top-down control in place (Keast and Mandell, 2014; Koppenjan and Klijn, 2004). The consequence may be that required qualities of flexibility and trust in networks are affected and that synergetic advantages are more difficult to reach.

Despite its limitations (see Chapter 5), the study provided evidence supporting applicability of the research problem. However, larger-scale research is needed to test the applicability and generalisability of the study's outcomes. This requires finding additional theoretical perspectives, larger and possibly more representative samples, and different methodologies. The research found that the three prerequisites, mentioned in Research Question 2, can be indiscernibly entangled.

Common goals emerge most clearly, but perhaps because this most rational prerequisite is least related to basic underlying cultural assumptions in organisations (Schein, 2010), while on this deepest cultural level trust, values and rules are formed. To conclusively answer Research Question 3, future research must go beyond formal, legal, objective or visible contexts, and concentrate on informal and subjective practices in networks. Immersive ethnographic research (Noaks and Wincup, 2004), may present a suitable means to compare partner-organisations and existing networks over longer periods of time. Also, other elements in Huxham and Vangen's (2005) theoretical frame, such as purpose, structure, power-relations and leadership, which were only superficially touched by this study, should be included in future research to provide a more in-depth picture of networked-cooperation.

The literature review argues that undermining crime poses serious threats to Dutch society and its financial-economic system. Although respondents expressed value-congruence by acknowledging the importance of countering this crime-problem, little consensus existed over the perceived advantages yielded by the SCTF's most distinctive feature, tactical information-sharing (Track 1). Distinctions between tactical and strategic intelligence, and governance-tasks were not always clear. This indicates that participants are yet to be fully aligned. More broadly recognised was the added-value of Track 2, extrapolating new insights into new or improved monitoring scenarios.

Trust can be a delicate matter, assumingly *the* prime requirement for successful cooperation. On the outside, many respondents seem to regard trust as a given, undebatable value between partners. Under the surface, however, other sentiments existed, expressed by some experiencing that the development of synergies in the SCTF is hindered by lack of a common language and transparency about outcomes, interests and expectations. Others expressed no unambiguous confidence that other partners will refrain

from pursuing their own interests. Even though public-private cooperation is essentially intended to provide sympathetic, voluntary ways of working, political manoeuvring of organisations -or at least suspicions that other partners are not completely trustworthy or transparent- was evident. The research indicated that good governance of partnerships requires guidance of basic values, such as transparency and trustworthiness, and must do justice to cultural and organisational diversity. This was perhaps best phrased by R007:

“Trust commences by acknowledgement of different roles and responsibilities..., not by supposing that everybody wants the same thing. Please, let's be real”.

Disagreement and misunderstanding about the intended scope, goals and place in the regulatory landscape of the SCTF, may incur conflict-ridden “dialogues of the deaf” (Koppenjan and Klijn, 2004; p.19) if not carefully managed. The existence of ambiguity and hidden-goals may affect the perceived eventual achievability of the SCTF’s mission and affect partners’ sustained levels of commitment. At this moment it seems unlikely that the SCTF will ever be truly collaborative (Keast and Mandell, 2014), though a coordinated, project-approach seems within reach. This requires renewed deliberation between the SCTF partners, to synchronise various perspectives, perceptions and expectations, and align with other ongoing initiatives.

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9 Appendices: A. List of Abbreviations

Dutch translation		English translation
AML		Anti-money laundering
AMLC		Anti-Money Laundering Centre, a multidisciplinary knowledge pool set up by the FIOD in 2013.
CDD		Customer Due Diligence
Combi Team		A combined investigative team, focusing of financial-economic crime, consisting of FIOD and Police staff.
CTF		Counter-terrorist financing
ECTF		Electronic Crimes Taskforce
FATF		Financial Action Taskforce (FATF, 2017), is an inter-governmental body established in 1989 to standardise and promote effective implementation of legal, regulatory and operational measures for combating money-laundering, terrorist financing and other threats to the integrity of the financial-economic system.
FEC	Financieel Expertise Centrum	The Financial Expertise Centre was established in 1999 to monitor and strengthen the integrity of the financial-economic system in the Netherlands. FEC operates on a strategic level. FEC Council members include regulators law enforcement agencies OM, the Dutch Banking Association and board members of the major banks. The FEC Council is the (envisaged) governance body for public-private and interbank activities (SCTF, TFTF, KYC- and TM-Utility) and future FISPs and other PPPs involving the financial sector
FIOD	Fiscale Inlichtingen- en Opsporingsdienst	Fiscal Intelligence and Investigation Department, part of the Ministry of Finance
FISP		Financial Information Sharing Platform
FIU		Financial Intelligence Unit, in the Netherlands part of the National Police
JMLIT		Joint Money-Laundering Intelligence Team (UK)
MinFIN	Ministerie van Financiën	Ministry of Finance
MinV&J	Ministerie van Justitie en Veiligheid	Ministry of Justice and Security
NCA		National Crime Agency (UK)
NVB	Nederlandse Vereniging van Banken	Dutch Banking Association
OCG		Organised Crime Group
OM	Openbaar Ministerie	Public Prosecutor's Service, part of the Ministry of Justice and Security
OT	Ongebruikelijke Transactie	Unusual Transaction
PPP		Public-Private Partnerships
SCP		Situational Crime Prevention
TCA		Theory of Collaborative Advantage
TFTF		Terrorist Financing taskforce
TM		Transaction Monitoring
STR		Suspicious Transaction Report
VT	Verdachte Transactie	Suspicious Transaction
WWFT	Wet ter voorkoming van Witwassen en de Financiering van Terrorisme	Dutch AML/CTF legislation
WPG	Wet Politiegegevens	Dutch Police Information Act

Appendix H. Interview Questions and analytical design

	Research Question	Structure		Culture		Prerequisites				
		Political/Societal/other interests	Regulatory	Organisation Culture	Occupational Culture	(Shared) Values	(Common) Goals	Trust	Leadership	
Question 1: Role in the finance-security assemblage										
1a	What are the (formal) tasks, responsibilities or instructions of your organisation in anti-money laundering? GOAL: Define position and formal role/mandates in the security-finance assemblage, definition of interests and games played by the organisation	1								
1b	What are major influences that shape the role of your organisation in anti-money laundering? GOAL: Development of position in the security-finance assemblage, definition of games played by the organisation	1								
1c	How have the role and responsibilities of your organisation changed over time? (e.g. past 5 years) GOAL: Determine respondent's point-of-reference; Define interests and games played by the organisation.	1								
1d	To what extent are existing anti-money laundering regulations effective in mitigating money-laundering and/or organised crime? GOAL: invoke reactions regarding the perceived effectiveness of the regulatory system	1								
1e	What else could or should be done to counter money-laundering effectively? GOAL: invoke reactions regarding the perceived effectiveness of the regulatory system	1								
Question 2: Attitude towards collaboration										
2a	What is your organisation's experience with public-private co-operation? (earlier initiatives, successes, failures, best practices?) GOAL: probe organisation's attitude and respondent's confidence in public-private cooperation concept;	1,3								
2b	What is your/your organisation's formal position towards public-private partnerships as a means to mitigate money-laundering? GOAL: explore if PPP is regarded a strategic/tactical or operational level-activity in organisation, which defines confidence in the added-value of networks	1,2								
2c	How has this position been developed/shaped in your organisation? GOAL: explore if the role of leadership and management towards networks, what are the espoused beliefs and values?	3								
2d	How has this position been shared? (inside/outside organisation) GOAL: explore if PPP is regarded a strategic/tactical or operational level-activity in organisation, which defines confidence in the added-value of networks	3								
2e	What is the attitude in your organisation towards information sharing? GOAL: Test hypothesis H1 to determine if willingness to actively share confidential information with other taskforce participants be reasonably expected, in the light of organisational and professional culture	1								
2f	How would you describe the prevailing professional culture(s) in your organisation? GOAL: Estimate dominance of cultural influences from organisation on the SCTF partnership; obtain understanding of exiting visible cultural structures	1								
2g	How does the organisation culture affect attitudes towards information sharing? GOAL: Test awareness of and responsiveness to cultural influences of respondent. Cultural: what are dominant basic underlying assumptions in organisation?	1								
2h	How has participation in earlier PPPs affected attitudes towards information sharing in your organisation? GOAL: determine how attitudes, agency and confidence towards public-private cooperation concepts develop over-time.	3								
Question 3 : vision on the SCTF										
3a	How is your organisation involved in the SCTF initiative? GOAL: Estimate level of involvement and commitment to SCTF initiative. Identify relevant <i>game scenarios</i> . Define Agency (orientation between the network and own organisation)	1,2								
3b	What are the perceived benefits of the SCTF initiative? (to your organisation, to other participants, to society, to the regulatory system, to the financial system etc.) GOAL: test which considerations and interests prevail with regard to cooperation. Can mutuality be expected?	1,2								
3c	Why is the SCTF initiative important to your organisation? GOAL: test which considerations and interests prevail with regard to cooperation. Can equality of participants be expected?	1,2								
3d	What is the role of each organisation in the SCTF initiative? (law enforcement, FIU, prosecutor, banks)? GOAL: determine innovative vs conservative drivers	1,2								
3e	What conditions will render the SCTF initiative successful? GOAL: determine if respondent is inclined towards rationality, empathy, altruism or opportunism.	2								
3f	What are the risks of the SCTF initiative? GOAL: determine if respondent is inclined towards innovation or conservation of the regulatory system	1,2								
3g	What conditions can form a risk to the success of the SCTF initiative? GOAL: Determine awareness of pre-requisites, or allow other themes to emerge.	1,2,3								
Question 4: Pre-requisites if previous questions does not provide sufficient feedback with regards to the research questions)										
4a	a) How important are shared values among participants in co-operation? GOAL: invoke reaction toward pre-requisite of value congruence.	2,3								
4b	b) To what extent does your organisation share the same values towards financial-crime with the other SCTF participants? GOAL: invoke reaction towards standpoint and sincerity of value congruence.	2								
4c	b) How important are common goals among participants in co-operation? GOAL: invoke reaction on goal congruence.	2,3								
4d	c) How important is trust among participants in co-operation? GOAL: invoke reaction towards trust, trustworthiness and "trust transfer"	2,3								
4e	d) What would define trust in the SCTF initiative? GOAL: invoke reaction towards the expectations about trust and trustworthiness in the SCTF	2								
	expected outcome									answer of respondents expected to include this theme
	possible outcome									answer of respondent may possibly include this theme
	not expected									answer of respondents are not expected to include this theme

Appendix I. Analytical Frame

The diagram below was designed by the researcher to be used as part of the analytical frame. It was produced to indicate relative differences in positions, perceptions and attitudes between respondents from various (types of) organisations, over seven different analytical dimensions mention in the dissertation. Please note that the diagram represents the researcher's train of thought, reasoning and interpretation of the data during analysis, it was used to formulate conclusions in line with the explorative nature of the study. As the diagram is not supported by any quantifiable data, was known to be subjective does and was therefore left out of the main body of the dissertation.

