

MINISTRY OF DEFENCE

NETHERLANDS DEFENCE ACADEMY

## STUDY GUIDE (2022 - 2023)

**MANAGING STRATEGIC TRADE:  
MASTER COMPLIANCE AND INTEGRITY IN INTERNATIONAL  
MILITARY TRADE (MSc)**

**Version 2**

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## **Disclaimer**

The content of this study guide refers to the modules pertaining to the FMS-CIIMT curriculum as offered over the course of the Academic Years 2021-2022. Changes to modules or curriculum may appear in between. At the beginning of each year a new study guide will provide the latest information of the two academic years to follow. No rights can be obtained from the information in this study guide.

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# PART 1 INTRODUCTION MASTER CIIMT

## **INTRODUCTION: WHY COMPLIANCE AND INTEGRITY IN INTERNATIONAL MILITARY TRADE?**

The re-imposing of U.S. sanctions against Iran, the US-China trade war, the threats expressed by the US about EU high-technology exports to China, the termination of the INF treaty between the US and Russia, the political turmoil surrounding the Nordstream-2 pipeline project, and the sales of military-strategic items under the heading of humanitarian support. These are just a few examples of geopolitical events that recently hit the news.

All these events have one thing in common, they are all to some extent are related to strategic trade control. The term “strategic trade control” generally refers to the efforts that states undertake in order to design and implement measures to regulate the international movement of military-strategic goods and dual-use items that might exacerbate an ongoing conflict, contribute to destabilizing weapons build-ups, or be used in violations of human rights. The need for states to exercise effective control over international arms transfers is universally accepted and is based upon specific international regimes, arrangements and treaties, but also on norms and principles.

Strategic trade policies imply a strategic relationship between firms, governments, and international institutions, such as the various strategic trade control regimes. It covers arms control, nuclear non-proliferation, and a variety of national security issues plaguing all nation states. The strategic trade control frameworks shape the business environment and regulatory context in which industry must operate, navigate and align with, both nationally and internationally, in order to conduct and sustain business relating to the transfer of controlled items. Due to the complex nature and evolving policy landscape, compliance with strategic trade controls can involve a high level of cost, additional resources, and an ongoing commitment from industry and end-user. Two significant trends are quite visible in the recent past. First, regulations that should improve international security are regularly abused for economic purposes, as illustrated by the recent trade war between China and the US. Second, the growing importance of dual-use products. This creates many monitoring issues and makes strategic trade policies subject to continuous change.

Violation of the strategic trade legislation might lead to severe consequences, for instance, limited access to military-strategic items in the future or losing trade privileges, high fines, or even prison sentences. In this respect, the US International Traffic in Arms Regulations is considered the most severe body of regulations as it has an extraterritorial effect.

Compliance with trade control rules is not only the responsibility of the defence-related industry, but also of the end-user such as the armed forces. Strategic trade controls are, therefore, not only relevant from a strategic perspective, but could also bring serious challenges to any organization that is part of the supply-chain of military-relevant or dual-use items. That is precisely the focus of the interdisciplinary MSc program Compliance and Integrity in International Military Trade (CIIMT).

CIIMT is concerned with exploring, analysing, understanding, explaining, controlling and improving the military dimension in international military trade. More particularly, CIIMT studies managerial questions regarding strategic trade control of military and dual-use goods and services. These questions often include economic, ethical, organizational, legal and strategic elements (e.g. human rights, international order and security).

CIIMT continues where the NLDA bachelor's degree program in Military Management Studies (MBW) ends and, from a defence economic perspective, focuses on a specific set of coherent questions regarding the management of strategic trade control of international trade in military and dual use goods and services.

This study guide provides you with information about the relevance, curriculum structure, course details, schedules and other general information about the master CIIMT. For detailed information about teaching and assessments, see the CIIMT Teaching and Examination Regulations (TER) CIIMT.

### Program focus

At the request of the Dutch MoD, CIIMT is primarily designed to cater for the needs of military and civilian defence personnel, including EU, NATO, from all services and/or commands and Defence relevant industries, agencies and research centres, active in the field. The program can be seen as a natural follow-up of the FMS bachelor's degree program in Military Management Studies.

CIIMT ties in with the FMS-NLDA vision on scientific education, and, similar to other FMS master's degree programs, aims to deliver so-called Officer Scholars, embedded in Schön's "reflective practitioners" paradigm. The paradigm refers to two characteristics. First, it unites both management- and leadership skills needed to decide and operate in high-tension and high-risk knowledge intensive environments. FMS uses the *reflective* practitioners paradigm to refer to critical thinking, reflection, and *Bildung* that characterize its "thinking doers", either at the academic bachelor's or master's level.

In view of the complexity of international trade of military and dual use goods and services, the rapid evolution of strategic trade control, and its importance to procurement processes, defence organizations are in need of innovative thinking doers, that, based on in-depth understanding, from an interdisciplinary perspective can be expected to find- and take responsibility for creative solutions to problems.

Second, being "reflective *practitioners*", CIIMT students will be able to draw from their experiences in the field of trade compliance.

CIIMT, by integrating scientific based- and practice based knowledge, aims for students to develop as academic professionals, that are able to generate and implement problem solving strategies and management decisions to further compliance and integrity in strategic trade control of international trade in military and dual use goods and services.

## Program objectives

Each CIIMT graduate is, on completion of the program, able to:

1. use state of the art scientific knowledge and new insights to understand relevant managerial themes and questions regarding strategic trade control of international trade in military and dual use goods and services;
2. generate knowledge regarding strategic trade control of international trade in military and dual use goods and services, both independently and in cooperation, based on obtained scientific knowledge and insights;
3. set-up an effective and efficient internal compliance program for the own organization;
4. abstract, analyse, structure and relate complex data into relevant information to identify underlying core questions and themes to gain an overall picture;
5. communicate ideas, perspectives and findings, both orally and in writing;
6. consider, reflect and account for their own learning, *Bildung* and actions.

In Annex B the generic attainments are operationalized in more detail.

## Program structure

See figure 1 for the CIIMT curriculum.

The CIIMT Master's degree program is designed as a part-time taught program taught over the course of two years, totalling 60 EC. Upon successful completion, the degree obtained is a Master of Science (MSc).

The program consists of 10 modules. With the exception of the thesis, each module is structured in five independent learning weeks, one contact week and one experiential learning week. For information on the planning of modules, see the module schedule attached to this guide (annex A). Independent learning will take place in preparation on the contact weeks. By means of 'guided' self-study, weekly, students study parts of literature and prepare assignments. Some of these will be commented on in the form of formative feedback, i.e., results will not be used for grading but for gaining better understanding of the course objectives. Other assignments may be discussed during contact week(s) or may be part of the overall course grading. Independent learning, as a working method, should not prevent students to feel free to consult their peers, teaching staff or their colleagues in the organization. As such, independent learning is related to experiential learning as well. Key to experiential learning is that students engage in a dialogue within their organization by sharing new insights and applying these to e.g., problem identification, -analysis and solution in their professional field. As such, experiential learning may not only benefit the student but the organization as well. Moreover, experiential



learning contributes to the deepening of understanding and the integration of scientific- and practice based knowledge. The ten contact weeks take place at the NLDA in Breda. Students must be prepared to spend 20 hours a week on self-study.

Module	EC	Title	Discipline	Leids Level
1	5	International trade in defence markets	Defence economics, international relations, political sciences	400
2	5	International business in defence markets and law	Law, defence economics, organization theory; international relations, political sciences	400
3	5	A legal perspective on strategic trade	Law, ethics, defence economics	500
4	5	Managing compliance and integrity in military organizations	Ethics, system theory, organization theory, defence economics	500
5	5	Designing internal compliance programs	Information systems, internal control	500
6	5	Research methods	Research methods	500
7	5	Monitoring and auditing internal compliance programs	Information systems, internal control, auditing	500
8	5	Managing relationships in non-compliance contexts	Organization theory, ethics, change management, management control	500
9	5	Integration project related to aspects of ICP in business environments	All previous modules	600
10	15	Master Thesis (including individual research proposal)	All previous modules	600
Total	60			

Figure 1: CIIMT's curriculum

The program benefits from a very positive student-teacher ratio. Only 20 students are allowed to enrol in the program and this is the maximum of students that will attend a lecture. This enables lively discussions, active participation of students and direct engagement with the faculty. It also allows individual feedback on essays and supervision of thesis development.

The program derives its coherence from the following structure.

First, by taking an outside-in perspective, modules 1-4 provide an interdisciplinary context from which strategic trade control in international trade of military and dual use goods and services can be understood.

Next, building on this background, the program proceeds to deepen the students' understanding of particular control and information aspects within organizations by studying (feasibility and boundaries to) re-designing, implementing, monitoring and auditing internal compliance programs (ICPs) within organizations. Students are involved in how to construct an ICP. To

this end, modules 5 and 7 integrate practice-based knowledge and skills, stemming from experience in the field, with scientific-based knowledge on information systems and internal control. By sharing knowledge and experience, students and teaching staff learn from each other and commitment to the program is expected to increase. Building on these modules and the module on research methods (module 6), it becomes possible to study and discuss problems, challenges and controversies that will only partly be solved by ICPs, such as, managing non-compliant behaviour or conflicts of interest within and between organizations in international trade in military and dual use goods and services (module 8).

The Integration Project (module 9), subsequently, draws from all previous modules, enabling students to conduct their own interdisciplinary research, based on their selection of ICP key elements in relation to a specific business environment and using appropriate research methods. The Integration Project can be seen as a stepping stone to the thesis phase (module 10), including the individual research proposal (IRP).

The module levels are indicated using the *Leids register*<sup>1</sup> which places the Bachelor-Master education on a scale of 100-600, where Leids levels 100-400 are used for bachelor level education and Leids levels 400-600 are used to indicate the level and complexity of master level programs. The first two modules in the CIIMT program commence at Leids level 400 meant to enable both a smooth transfer from the bachelor's to the master's level as well as setting the scene by (re)acquainting students with the (defence) economic fundamentals of the program, taken into consideration they will hail from various professional backgrounds and scientific domains. Modules 3-8 are developed at level 500, posing increasing challenges to critical thinking, reflection and independent study from the students. During contact weeks and tutoring sessions methodological skills will be trained to gain more in-depth understanding that can be applied to find novel solutions for problems in the field. As the program proceeds in complexity students are expected to take appropriate responsibility for their own learning process. Literature is provided at an advanced level intended for researchers and the assignments are focused on problem solving through increasingly independent research, and various means of reporting. Throughout the program, assignments focus both on individual problem solving and problem solving in small groups. Essays and papers require elements of original research. Modules 9-10, the Integration Project and thesis work are conducted at level 600 and students are asked to contribute a self-directed critical analysis integrating different views, including the development of an original approach towards the research subject or ICP. Finally, at Leids level 600, a thesis is required for the completion of the program.

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<sup>1</sup> Leids Register, level 400: specialized course; level 500: course with an academic orientation; level 600: highly specialized course

## Student Testimonials



**Student Ben:** *Working as a senior legal adviser Export control and Compliance at Army Headquarters and having attended short focused export control courses and seminars, I felt the need to do a deep-dive and study the area in a more broad sense. The content of the course is both interesting and relevant and makes a valuable contribution to my day-to-day work. The interaction with the teaching staff and a small group of fellow students is extremely beneficial for discovering the many aspects that ultimately should lead to a compliant Defence organization.*

*What I like best about the CIIMT is the overall set-up: six weeks independent learning (reading & writing) followed by a contact-week in Breda as it offers students the possibility to combine full-time work and study in a very balanced and professional way.*



**Student Dik:** *Applying for the job 'head of the export control compliance team' of the Army I knew that there was an obligation connected to this position to follow the Master Compliance and Integrity in International Military Trade. So far this does not in any way feel as an obligation as this interesting study has given me a lot of insights in fields which were previously out of my scope. Being a lawyer the legal part on international treaties and export control laws and regulations was of course interesting. But also courses like the international trade of weapons, internal control and auditing, the basics of scientific research, situations of non-compliance have given me a broad and interesting perspective on the issues I have to deal with in my daily job.*

*Interaction between students both military and civilian from various backgrounds adds value to this course. Being and working together during the contact weeks in Breda creates a sense of comradeship which I appreciate very much.*

*Following a master study is a serious investment in time and energy. Preparation during the independent learning weeks takes a serious amount of time with lots of stuff to read and preparation of cases and presentations. But in my opinion this is all worthwhile as this adds to the effectiveness of the discussions in class as well as to your own study results and development.*



**Student Mark:** *I chose the Master program CIIMT, because of my personal interests in the world of compliance and because to further develop myself. Previous I studied criminal law and white collar crime and both areas have much in common with the complex world of export regulation and compliance. After all, non-compliance behaviour often results in criminal offenses and CEO's of such organizations can be suspect of several white-collar crimes.*

*Furthermore, the Master is unique in the Netherlands and even Europe. Although several master programs are offered, the Master CIIMT is the only accredited master with a far-reaching focus on compliance and arms export control. For example, not only export control regulation is part of the curriculum, but also economics, integrity, internal control and the management of non-compliance behaviour in organizations. The Master's program has offered me broader insight and knowledge into the complex world of arms export control, integrity and compliance which is highly relevant and applicable both academically and in practice.*

*The Master CIIMT is a part-time study and that means that the study often takes place next to working hours that is sometimes difficult given the considerable study load, but with good planning it can certainly be done.*

*The contact with lecturers and fellow students is predominantly positive. The study material is discussed with students on various forums. The contact with the lecturers is excellent. The lecturers are real experts with a lot of knowledge in each individual area. Although the study often takes place remotely, especially under the current circumstances with regard to Covid-19, the teachers make an enormous effort so that the program can continue.*

*Although the field of compliance officer is not yet a protected one, the master CIIMT offers anyway thorough knowledge and expertise in the field of arms export control compliance and integrity that are in my opinion indispensable for a compliance officer.*

### Student Characteristics

CIIMT provides for students that seek to gain more in-depth understanding, by integrating practice based- and scientific based knowledge on modern defence procurement. The program is thought to be of interest to those currently engaged in international trade of military /dual goods and services either on the demand (MoD, governmental, NATO, EU) side or on the supply (defence related industry) side, as well as (inter)national regulatory agencies or research centres.

The program encourages initiative and stimulates independent learning required both for an academic mind-set characterized by critical thinking and reflection as well as for professional development. It provides students with analytical and methodological research skills. CIIMT encourages students to bring their own (organizational) problems, to study from differing perspectives in an interdisciplinary way. In doing so, together with their teaching staff, students are enabled to develop solutions and to act as each other's sparring partner concerning processes and projects regarding international arms trade.

## **Who can apply?**

Students with an interest in the CIIMT program hold a relevant academic bachelor (European Quality Framework 6) and have a sufficient command of the English language. For additional information about the admission requirements prospective student are advised to consult the Teaching and Examination Regulations (TER) on the NLDA website: <https://english.defensie.nl/topics/netherlands-defence-academy/master-compliance-and-integrity-in-international-military-trade>.

In addition, the FMW offers a deficiency program consisting of 35 European Credits (EC). This deficiency program is mainly intended for bachelors of applied sciences (HBO) or bachelors of science who want to follow the master CIIMT but do not fully meet the admission requirements. Additional information about the deficiency program can be found in the TER or contact the program coordinator ([master.ciimt@mindef.nl](mailto:master.ciimt@mindef.nl)).

## **How to apply?**

The final date for submission of the application form and other documents necessary for enrolment is May 1<sup>st</sup> 2023. All applicants will receive notification about their acceptance to the program before June 12<sup>th</sup> 2023. For further information on applying, please see the website: <https://english.defensie.nl/topics/netherlands-defence-academy/master-compliance-and-integrity-in-international-military-trade>.

## **Tuition Fee**

The programme is free of costs (excluding study books) for employees of the Netherlands Ministry of Defence if their application is supported by their military unit or department. This also applies to foreign military students of NATO and civilian and military personnel of other NATO bodies.

Other students are required to pay tuition fees. The statutory tuition fee for the academic year 2023 - 2024 is €2.314. Students who have already obtained a master's degree will be charged the institutional tuition fee (€ 4.628). The statutory tuition fees are determined each year by the Netherlands Ministry of Education, Culture and Science (WHW art 7.45, art 7.45a and art. 7.47).

The Netherlands Defence Academy will not provide assistance in obtaining visas, housing, or any other non-education related issues for students.

## **Digital Learning Environment**

The modules are supported by the use of the digital learning environment Moodle. Within the Moodle environment, students can find presentations, documentation and other course material in addition to the standard course material. Moodle is also used for communication between students and between students and teachers. Furthermore, Moodle allows for the administration of assignments and the check for plagiarism for uploaded assignments. Login details will be provided when applicable.

## Library

The library of the Netherlands Defence Academy (NLDA) facilitates students and scientists in realizing their scientific goals. In addition to a large physical collection in the field of military science, staff and students of the NLDA have access to a large collection of online scientific resources. This digital collection is also accessible from outside the NLDA workplace. The search engine LibSearch provides access to the total collection of the library. You can log in with your @nlda-account.

Both in Breda and in Den Helder the library has a modern study and research environment with many opportunities for studying individually or in a group. These workstations are also open in the evenings.

In addition, training courses and workshops in the field of information literacy and the use of Zotero. The library also advises about copyright and publishing, and provides sustainable archiving and access to research publications.

More information: <http://bibliotheeknlda.libguides.com/home> and <http://bibliotheeknlda.libguides.com/CIIMT>.

## Quality assurance

The master CIIMT, like all universities, is subjected to regular audits by the Accreditation Organisation of the Netherlands and Flanders (NVAO). The program has last been audited by an international array of experts under the auspices of the NVAO in 2018. This audit has led to a positive accreditation of the master CIIMT.

The NVAO accreditation framework has been operationalized in an internal quality manual (Education and quality manual). The manual specifies the responsibilities of all those involved within the quality cycle. This manual ensures the program quality and is monitored at curriculum and module level. Many expert are involved to ensure the quality of the CIIMT master.

The Program Board (PB) is responsible for the teaching program, i.e. for designing and implementing the teaching program, quality and cohesion. Formally, the board member for degree programs holds day-to-day responsibility on the degree programs, but, based on the agreements made within the faculty, this responsibility is delegated to the program boards. The following people are member of the PB:

- Prof. Dr J.G. Klomp (chairman)
- Prof. Dr R.J.M. Beeres
- *Mr.* D. van Manen (student member)
- *Drs.* K. Smetsers (program coordinator)

The role of the Board of Examiners (BoE) is to ensure that the study program adhere to their Teaching and Examination Regulations. The Board of Examiners oversees all tests and

examinations within the master CIIMT and determines whether students have acquired the knowledge, understanding and skills required for the awarding of their degree. The BoE is responsible for the effective organization and quality assurance of all tests and examinations within the master. The BoE also makes the final decision on request for a change to the academic requirements (for example an exemption or extension).

The following people are member of the BoE:

- Col Dr R.M.M. Bertrand RA RC RO (Chairman)
- Dr J.E.D. Voetelink
- *Drs.* J.J.M. Geurts
- *Drs.* K. Smetsers (secretary)

The program committee (or education committee) is a joint committee made up of equal numbers of students and teaching staff. The major task of the program committee is to monitor the quality and studyability of a curriculum and to identify problems. The program committee has the right to propose changes and to request supplementary information on all education-related subjects. The program committee also has the right to vote on changes to the Teaching and Examinations Regulations; it is obliged to evaluate these regulations annually and submit recommendations to the faculty board. The following people are member of the program committee:

- Dr J.F.C. Timmermans (chairman)
- Dr T. De Schryver
- Ltcol B.J.C. Dekkers (student member)
- Cap *mr.* M.M.G. Keunen (student member)

### Evaluations

Evaluation of the program and curriculum is an ongoing process. The program as a whole will be evaluated when delivered for the first time and subsequently at least once every six years or in case of major changes. Each module is evaluated separately every cohort.

Besides the official evaluations, student are welcome to critically evaluate the program in its full form throughout the academic year.

### Complaints

Information on how to file a complaint is available in the TER.

### Privacy Regulations and Code of Conduct

See annex C and D.

## PART 2 MODULE DESCRIPTIONS

**NOTE: ALL SPECIFIC COURSE DESCRIPTIONS ARE SUBJECT TO CHANGE.** THE COURSE DESCRIPTIONS, AS PRESENTED IN THIS STUDY GUIDE, ARE DESIGNED TO INFORM PROSPECTIVE STUDENTS ON THE COURSES AVAILABLE AND ON WHAT TO EXPECT IN TERMS OF OBJECTIVES, FOCAL AREAS, STUDY MATERIAL, AND ASSESSMENT. STUDENTS WILL FIND MORE DETAILED COURSE INFORMATION ON THE ELECTRONIC LEARNING ENVIRONMENT (MOODLE). ACCESS TO MOODLE WILL BE PROVIDED ONCE ENROLLED TO THE PROGRAM.



## **MODULE 1: INTERNATIONAL TRADE IN DEFENCE MARKETS**

### **Administrative details**

Course director: Prof. Dr Jeroen Klomp.

Lecturer(s): Prof. Dr Jeroen Klomp; Prof. Dr Robert Beerens.

### **General objective**

From a defence economic perspective, the student can elaborate and reflect on factors that influence international trade in military and dual-use goods and services and the conditions determining whether such international trade will be beneficial (or not) and to whom.

### **Course objectives** (the numbers between the squared brackets refer to the exit qualifications of the master program)

The student will be able to:

1. understand and describe international trade as is demonstrated by a clear grasp of the factors influencing international trade and why, how and to whom international trade is beneficial [1.1];
2. understand and describe what international trade in military/dual-use goods and services consists of, as is demonstrated by the ability to elaborate whether, why, how and to whom international trade in military/dual-use goods and services is beneficial; to elaborate on factors influencing international trade in military useful goods and services [1.1];
3. understand and describe scientific research as is demonstrated by the ability to explain, clarify and apply knowledge acquired from state of the art scientific papers; the ability to read, analyse, synthesize and communicate across theoretical disciplines succinctly [5.3; 5.4].

### **Course description**

In this first course of the program the economic foundations underlying strategic trade controls are studied. Generally, in line with the Ricardian view on comparative advantage, export is regarded to be beneficial to participating countries. Similarly, concerning arms trade, it is put forward that access to foreign markets is a sine qua non for a thriving domestic arms industry in the long run. However, it is also widely recognized that arms exports can hold negative externalities on national security and, as a consequence, national controls on arms industry exist at a global scale. Primarily, during this course, we will focus on economics, for, to study regulating and controlling international arms trade in a meaningful way, it is necessary to first understand the details of the economic dynamics involved. The impact of ethics, politics and strategic concerns on arms trade will be studied in subsequent courses.

Secondly, this course aims to develop academic skills. To this end, and next to the textbook, students study a selection of journal papers and prepare to present their findings by conducting some formative assignments. During contact hours feedback will be provided and together, teaching staff and students reflect on how the papers have been studied.

While preparing for their presentation, students will reflect on:

- Interpretation of the central question and contribution of the paper;
- Structure of the paper;
- Content (theoretical and empirical) of the paper;
- Conclusions;
- Relevance for practice;
- Relevance of the paper in relation to the theoretical part of the lecture/working group.

### **Course structure and method**

The course is conducted at level 400 and amounts to 5 ECTS. 1 ECTS equals 28 hours of study load. Education is based on the preparation-feedback model.

### **Literature**

#### ***Book***

Krugman PR, Obstfeld M, Melitz MJ (2015) *International Trade. Theory and Policy*. Pearson Education Limited, Harlow: England.

Stohl, R., Grillot, S. (2009). *The International Arms Trade*. Polity.

#### ***Papers***

To be announced through Moodle.

### **Assessment**

Presentation 30%

Exam 70%

## **MODULE 2: INTERNATIONAL BUSINESS IN DEFENCE MARKETS AND LAW**

### **Administrative details**

Course director: Prof. Dr Jeroen Klomp.

Lecturers: Prof. Dr Jeroen Klomp; Col. (ret) Dr Joop Voetelink.

### **General objective**

The student understands the relevance of law and legal knowledge for managers and is able to reflect on the interrelatedness between law and business in an international military trade context. The students develop the legal awareness required to analyse trade compliance aspects of international trade in defence markets.

### **Course objective** (the numbers between the squared brackets refer to the exit qualifications of the master pro-gram)

The student will be able to:

1. explain and reflect on the interrelatedness between law and business in an international military trade context [1.2];
2. explain and reflect on the influence of law and regulations on international trade in defence markets [1.2];
3. identify and reflect on an organization's legal and regulatory environment relevant for international trade in defence markets [1.2];
4. explain and reflect on the influence of the regulatory environments relevant for international military trade on the business activities of an organization [1.2];
5. analyse and reflect on the legal and business aspects of military trade regulation for a self-selected business case [5.1; 5.2; 5.3].

### **Course description**

In this course, students gain a comprehensive overview of the interrelatedness of law and business in an international military trade context. From a strategic perspective, the international transfer of military-strategic goods, including conventional weapons and dual-use goods is subject to specific international regimes, agreements, and regulations. This framework is designed to prevent weapons systems, technologies, knowledge, and services, posing threats to international safety and security, from falling in the hands of violent state and non-state actors. However, the implementation of such control system is increasingly difficult due to three primary reasons. First, the existing international strategic trade control regimes are not legally binding, but are 'only' established guidelines. As a result, these international regimes need to be converted into national legislation by individual states to different degrees. Second, there is a trade-off between protecting the domestic defence industry from international competition on the one hand and concerns of national security on the other. Finally, the growing importance of dual-use products creates monitoring issues and makes strategic trade control policies subject to continuous change. Organizations operating in international defence markets have been reporting that their corporate strategies, reputations, risk management, and commercial activities have been adversely affected by increasing regulation. By studying, analysing and

reflecting on the interrelatedness of both legal and business concepts students will develop necessary awareness to understand and function in international trade in defence markets. The lectures are mainly built around the question “how does the international regulation and control of arms trade affect the way of doing business of organizations”. The bodies of regulations organizations have to, or prefer to, comply with are one of many factors to take into account in today’s organizational environments that are becoming increasingly complex. Underlying this complexity is, for instance, the introduction of new regulations in some business areas, whereas, deregulation takes place in others, internationalization, and accelerations spurred by technological changes and innovations. Whenever organizational regulatory environments become more complex, organizations find themselves exposed to more risks.

Secondly, this course aims to develop academic skills. To this end, students will have to analyse and critically reflect on the interrelationship between legal and business aspects of a specific case taken from their own organization involving international military trade in goods and/or services. The students have to write a report addressing at least the following aspects: (i) the regulatory environment of the business case, (ii) the role of international arms trade regulations and control and (iii) how are the business activities and/or process affected by the regulatory environment related to international military trade. These aspects will be studied during the course and the weekly assignments that have to be prepared in the independent learning weeks and should be used as input for the report.

### **Course structure and method**

The course is conducted at level 400 and amounts to 5 ECTS. 1 ECTS equals 28 hours of study load. Education is based on the preparation-feedback model.

### **Literature**

#### ***Book***

Hamilton, L., Webster, P. (2018). *The international business environment*. Oxford University Press.

Klabbers, J (2017), “*International Law*” (2nd ed.), Cambridge University Press

Stohl, R., Grillot, S. (2009). *The International Arms Trade*. Polity.

#### ***Papers***

To be announced through Moodle.

### **Assessment**

Take-home exam 30%

Report and presentation 70%

## MODULE 3: A LEGAL PERSPECTIVE ON STRATEGIC TRADE

### Administrative details

Course director: Col. (ret.) Dr Joop Voetelink.

Lecturer: Col. (ret.) Dr Joop Voetelink.

Guest Lecturers: Semra Semra Türkalp, LL.M and Maj Hans van Riet, LL.M

### General objective

Students can discuss the background, complexity, and content of the legal framework of strategic trade in general, and they can elaborate and reflect on the relevant sub-disciplines of law. They can explain the role of major players in the field of export control law, such as the EU and the U.S., and identify and apply relevant legislation enacted by these entities. The students can relate specific topics of public international law, such as state responsibility and extraterritoriality, to export control law.

### Course objective (the numbers between the squared brackets refer to the exit qualifications of the master pro-gram)

The student will be able to:

1. Reflect on and explain the rationale and aims to underpin international law in relation to export control as well as key concepts and institutions in the field of trade in military / dual-use goods and services, and can identify and apply the most relevant national and international export/import laws and regulations [1.3];
2. Make responsible and well-argued theoretical and methodical choices in relation to analysing the industry-wide and organizational impact of specific export/import laws and regulations [4.1];
3. Can express ideas and visions in relation to the industry-wide and organizational impact of specific export/import laws and regulations [5.2];
4. Deliver a well-structured presentation on independent work regarding the application of relevant export/import laws and regulations within an organization [4.4];
5. Independently gain and apply knowledge concerning export/import laws and regulations [6.1];
6. Reflect and assess critically his/her own findings and courses of action in relation to the course assignments [4.1].
7. Identify relevant legal sources and use them in an academic setting [...].

### Course description

Building on Module 2, the present course provides a further introduction to public international law, *inter alia* addressing the relation between public international law and domestic law. Next (International) export control law is introduced by providing a helicopter view on this emerging sub-discipline of law. Against the backdrop of export control law, two specific topics will be explored: international responsibility and extraterritorial application of national (export control) law. Because of the broad impact of EU and U.S. strategic trade control legislation, both legal systems will be analysed in relation to export control law.

### **Course structure**

The course is conducted at level 500 and amounts to 5 ECTS. One ECTS amounts to 28 hours of study load. Education is based on the preparation-feedback model

### **Literature**

Aubin Y, Idiart A (2016) Export Control Law and Regulations Handbook: A Practical Guide to Military and Dual-Use Goods Trade Restrictions and Compliance. Kluwer International: Alphen aan den Rijn;

Beeres R et al.. (eds) NL ARMS Netherlands Annual Review of Military Studies 2021, Compliance and Integrity in International Military Trade, T.M.C. Asser Press. (forthcoming);Chapman B (2013) Export Control. A Contemporary History, University Press of America

Klabbers J (2017), International Law (2nd ed.). Cambridge University Press.

### ***Papers***

To be announced through Moodle.

### **Assessment**

Paper	30%
Open book exam	70%

## **MODULE 4: MANAGING COMPLIANCE AND INTEGRITY IN MILITARY ORGANIZATIONS**

### **Administrative details**

Course director: Dr Job Timmermans.

Course lecturer(s): Dr Job Timmermans; Prof. Dr Robert Beeres.

### **General objective**

The student understands, can elaborate and reflect on relevant and recent theories and models for managing compliance and integrity in (military) organizations, with specific attention to organizations in the context of strategic trade control.

**Course objectives** (the numbers between the squared brackets refer to the exit qualifications of the master program)

The student will be able to:

1. understand, explain and discuss moral behaviour using concepts of compliance and integrity [1.4];
2. understand, explain and discuss the contribution of a virtue ethics approach to bolster and support moral behaviour in organizations [1.4; 4.3; 4.4];
3. understand, explain and discuss systems theory fundamental to thinking on organizational governance. Particularly, regarding (a) abstract and concrete systems (b) the diagnosis and design of viable systems, and (c) systems theoretical principles underlying (the building of) organizational structures [1.4; 4.3; 4.4];
4. think systematically, to integrate (1), (2) and (3) with regard to the diagnosis and (re)design of virtuous corporate governance structures, incentives and performance management systems geared towards the anchoring of ethical conduct in organizations dealing with strategic trade control [4.1; 4.2; 4.3; 4.4; 4.5; 4.6; 4.7].

### **Course description**

From an interdisciplinary systems theoretical background, the course regards the management of compliance and integrity in (military) organizations to be a moral as well as an organizational diagnosis- and design problem. Using theories on systems regulation and control (Ashby), viable systems (Beer) and sociotechnical organization design (De Sitter), students study and reflect on organizational governance and control.

The course is based on both a virtue ethics and an integral management and organizational perspective. Central to virtue ethics is the development of moral character amongst organizational members. Based on this notion, we question how organizations support their members to exercise and develop moral character. Students are asked to study this question from an integral organizational and management perspective. More particularly, they are asked to reflect on the ways in which organizational tasks, roles and functions are defined and interrelated in the operational-, control- and information structures of organizations and how such structures contribute to support desired ethical and moral behaviour. Students are then

invited to apply these insights to organizations that operate in the context of strategic trade controls.

During the preparation phase and the first half of the contact week (feedback phase), students work on a model for organizational diagnosis and (re)design that expresses their own ethical awareness and moral insights and character. Next, they will apply this model on a case of their own choosing. At the end of contact week, students will submit a paper that discusses the model they have constructed as well as the application of this model to the selected case.

### **Course structure and method**

The course is conducted at level 500 and amounts to 5 ECTS. 1 ECTS equals 28 hours of study load. Education is based on the preparation-feedback model.

### **Literature**

#### ***Book***

Achterbergh, J., & Vriens, D. J. (2009). *Organizations: social systems conducting experiments* (2<sup>nd</sup> ed.). Dordrecht ; New York: Springer.

#### ***Papers***

To be announced through Moodle.

### **Assessment**

Paper 100%



## **MODULE 5: DESIGNING INTERNAL COMPLIANCE PROGRAMS**

### **Administrative details**

Course director: Col. Dr Robert Bertrand RA RC RO.

Course lecturer(s): Col. Dr Robert Bertrand RA RC RO; Dr Tom de Schryver; Dr Andre Hoogstrate.

### **General objective**

The student has a broad understanding and knowledge concerning theoretical and practical elements relevant to develop an Internal Compliance System. The student can apply both knowledge and skills to set-up an effective and efficient Internal Compliance System for organizations in the field of trade compliance. He/She can motivate and substantiate choices made in the design of an Internal Compliance System.

**Course objectives** (the numbers between the squared brackets refer to the exit qualifications of the master program)

The student will be able to:

1. understand, reflect, analyse and communicate on core concepts regarding internal control and management control [1.5; 3.1];
2. understand the role and functioning of risk assessments and apply risk management tools in the field of trade compliance [1.5; 3.2];
3. discover and analyse IT risks and to design adequate controls to match these risks [1.5; 3.3];
4. design, implement and monitor an Internal Compliance Program [1.5, 3.4].

### **Course description**

This course will provide students both theory, models and knowledge on internal- and management control, and risk management to understand, reflect and analyse the workings of Internal Compliance Programs in the field of trade compliance. Moreover, during the course students are enabled and motivated to develop skills and know-how necessary to design, implement and keep up-to-date internal compliance program in the field of trade compliance.

### **Course structure and method**

The course will be given at level 500 and is 5 EC. The educational model used is the Preparation-feedback model. This course will be delivered by a combination of pre-readings, lectures, class discussion and case studies. Pre-readings and lectures are designed to provide essential information and introduce students to theoretical concepts and models. Class discussion and group work help to learn from one another's experiences and internalize theoretical understanding by applying it to the context of Internal Compliance Programs. Casework applies theoretical concepts to organizational practice in the trade compliance field.

## **Literature**

### ***Book***

Biegelman, M.T., Biegelman, D.R. (2008) *Building a World-Class Compliance Program: Best Practices and Strategies for Success*. John Wiley & Sons: New Jersey.

Steinberg, R.M. (2011) *Governance, Risk Management and Compliance. It Can't happen to Us – Avoiding Corporate Disaster While Driving Success*. John Wiley & Sons: New Jersey.

Vaassen, E.H.J., Meuwissen, R.H.G., Schelleman, C.C.M. (2009) *Accounting Information Systems and Internal Control*. (2<sup>nd</sup> edition) John Wiley & Sons: New Jersey.

### ***Papers***

To be announced through Moodle.

### **Assessment**

The assessment consists of two parts;

1. A group presentation (30%) reflecting on the importance of designing, implementing and monitoring an Internal Compliance Program for any organization dealing with trade compliance, and:

2. A limited individual case study (based on a case provided by course lecturers) on the design, implementation and monitoring of an Internal Compliance Program, including an analysis of internal- and management control problems that the Internal Compliance Program will be confronted with/dealing with; a risk management analysis regarding the specific organizational context as well as a reflection on how the Internal Compliance Program, given the above, will best be designed, implemented and monitored. Last, the student will have to think on what problems in trade compliance will not be solved by the introduction of this Internal Compliance Program and, therefore, what other organizational safeguards will have to be in place. With the case there will be given specific questions on topics described above (70%). The case study needs to be handed in at the end of the experiential learning week.

## **MODULE 6: RESEARCH METHODS**

### **Administrative details**

Course director: Dr Tom De Schryver.

Lecturer(s): All CIIMT staff.

### **General objective**

Based on a mix of scientific; practice based and methodological knowledge, each CIIMT graduate is at the end of this module able to write a sound research proposal on a relevant topic in the field of trade compliance / strategic trade control of military and dual-use goods and services.

**Course objectives** (the numbers between the squared brackets refer to the exit qualifications of the master program)

The student will be able to:

1. distinguish differences and relations between interventions, applied and theoretical research [2.2];
2. obtain insights into various research designs and corresponding research techniques for analysis [2.3];
3. obtain insights into selection criteria to decide which research design and corresponding research techniques fits the problem [2.4];
4. formulate research goals and -questions to analyse a problem in the field of trade compliance / strategic trade control of military and dual-use goods and services [1.5; 1.6; 2.1];
5. operationalize the problem in terms of relevant research design and corresponding research techniques [1.5; 1.6; 2.2];
6. motivate the selection of a particular research design and corresponding research techniques [1.5; 1.6; 2.3; 2.4]; and
7. develop a research proposal [2.5].

### **Course description**

This course focuses on research designs. A research design “provides a framework for the collection and analysis of data. The choice of research design reflects decisions about priorities given to the dimensions of the research process” (Bryman, 2018, p. 595). Chapter 3 from Bryman and Bell (2018) alludes you that there are many different research designs to choose from. Students have to realize that when they make a specific choice for a certain research design, that it has serious implications on the expected outcomes, outreach and the required research techniques necessary to come to a trustworthy end.

Therefore the most popular research designs: -case study, cross sectional design, and experiment - will be discussed in detail throughout the module. We will in particular focus on different sets of quality criteria, sampling and data collection procedures for these research designs. We also address the issue how quality and sampling and data collection procedures are related. This is not as straightforward as it seems. The quality criteria for good research are not

universally accepted and depend to a large extent on the research orientation of the researchers in a research project. In order to relate all these research aspects in a research design we focus on the interplay between theory and research design.

We expect students to take two roles in this course. In the first role, students must assess existing research on its methodological merits. At first sight, it seems paradoxical to let them make profound judgements about research written by more senior researchers. Yet Bryman and Bell (2018) - among others - clearly show that social and business research is messy. Therefore, students should become aware of the 'do's' and 'don'ts'; of what constitutes 'good and 'poor' research and; of the limits and limitations of research they read. Here the different sets of quality criteria for research come to the fore. A great deal of care must be devoted to the precise argumentation for all kinds of choices in the research design.

In the second role, students will need to write their own research proposal that builds on their review of an existing study. In particular, this course focuses on the research methods used to determine the sample and through which the data is collected.

### **Course structure and method**

The course is conducted at level 500 and amounts to 5 ECTS. 1 ECTS equals 28 hours of study load. Education is based on the preparation-feedback model.

During the five independent learning weeks, students will first have to critically review existing studies in the broad field of trade compliance / strategic trade control of military and dual-use goods and services. The review of the studies has to be based on the quality criteria for good academic practice.

During the contact week experienced researchers from the CIIMT staff will in a guest lecture - style present some research practice focusing on methodological choices concerning the choice of research questions, the choice of a research design, the sampling, the data collection and data collection procedures. Also, students will have each day an intensive workshop that allows to assess as many as possible strengths and weaknesses of the reviewed study. The starting point of each workshop will be the review reports from the students in the preparation week. At the end of each workshop, there will be a wrap-up in which the course director will highlight the main strengths and weaknesses of a certain research design. This should be that last step for students to write new and better research proposals for these studies.

### **Literature**

#### ***Book***

Bryman, A., & Bell, E. (2018). Business research methods. Oxford University Press, USA.

#### ***Papers***

To be announced through Moodle.

**Assessment**

Research proposal (individual) (100%)

## MODULE 7: MONITORING AND AUDITING INTERNAL COMPLIANCE PROGRAMS

### Administrative details

Course director: Col. Dr Robert Bertrand RA RC RO.

Lecturer(s): Col. Dr Robert Bertrand RA RC RO; Dr Tom De Schryver; Col. Hans van Lamoen RA.

### General objective

The student has knowledge of all theoretical and practical elements that are relevant to monitor and audit an Internal Compliance Program. Although in practice mostly the designation audit is used (as we do in the rest of this description) this course deals with both monitoring and auditing since it covers both ongoing surveillance, review and analysis (monitoring) and the more periodic performed audits. The audits can aim for assurance as well as to provide advice for improvements of an Internal Compliance Program.

In this module, students will gain insight into how an audit process works. Therefore, all steps in the audit process will be covered in this module. However, students should not assume that after completion of the module they will have fully mastered all aspects of an audit nor that they would be capable to independently plan, perform and report about an audit from beginning to end. After all, one gradually gains audit experience and audits often require specialized knowledge, multidisciplinary skills and team work. Instead we hope to achieve that the student is able, at the end of this beginners course on auditing, to reflect on his position in the audit process and to make deliberate choices in the different stages of the audit process. As such, students will be better able to determine their role in the complex audit process. In doing so, we believe that they can effectively contribute to their next audit. Essentially the course focuses on three major themes

- Why perform audits?
- What is an audit?
- How to perform audits?

### Course objective (the numbers between the squared brackets refer to the exit qualifications of the master pro-gram)

The student will be able to:

1. understand, reflect and communicate the core concepts of internal auditing (focusing on operational and compliance audits) [1.6; 4.1; 5.3; 5.4];
2. plan, perform, report on compliance audits focusing on trade compliance and provide advice on the results thereof [1.6; 3.5];
3. plan, perform, report on operational audits of an Internal Compliance Program and provide advice on the results thereof [1.6; 3.5];
4. design and implement a strategy to increase the maturity level of a compliance program [1.6; 3.5];
5. report to executive management of an organization on the compliance risk profile of the company, the level of (internal) control concerning compliance and specific issues in the field of trade compliance (e.g., claims, fines) [1.6; 5.1].

## **Course description**

This module builds upon the knowledge and skills that students have acquired in module 5. In this module, students have become acquainted with the purpose and the main building blocks to design an ICP. As many of the practical recommendations for ICPs indicate, audits are amongst the essential building blocks in the design of an ICP (see also literature of Module 5). Executive management, regulators, and other stakeholders expect that the ICP of an organization provides reasonable assurance of regulatory compliance<sup>2</sup>. It is therefore important for any organization to continuously monitor, audit and improve its ICP. Hence, audits play a pivotal role in the trust building process of designed ICPs. Audits can result in valuable lessons and advice to improve the quality of an ICP.

Hence, students need to be aware that there are different kinds of, and aspects to auditing ICPs. This course will provide students canonical knowledge so that the student is able to make and/or understand motivated choices in the different stages of the audit processes. Broadly defined, the stages of an audit involve the planning, the performing and, the reporting of an audit. To get the most out of audits, students need to be educated in the various possible choices at each phase. An audit entails understanding the types of risks and opportunities associated with auditing; planning and organizing the work effectively; performing the audit within the agreed time schedule; prioritizing and focusing on matters of significance; communicating effectively, orally and in writing; collecting information through effective interviewing, listening, observing and reviewing documented information; understanding the appropriateness and consequences of using sampling techniques for auditing; understanding and considering technical experts' opinions; verifying the relevance and accuracy of collected information; confirming the sufficiency and appropriateness of audit evidence to support audit findings and conclusions; documenting audit activities and audit findings, preparing reports; assessing those factors that may affect the reliability of the audit findings and conclusions; maintaining the confidentiality and security of information. Each choice has an impact on the overall quality of an audit.

## **Course structure and method**

The course will be given at level 500 and is 5 EC. The educational model used is the Preparation-feedback model. This module will be delivered by a combination of pre-readings, lectures, class discussion and case studies. Pre-readings and lectures are designed to provide essential information and introduce students to theoretical concepts and models. Class discussion and group work help to assimilate the knowledge and apply it to the context. Casework applies the concepts from the lectures and literature.

## **Literature**

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<sup>2</sup> In the context of trade compliance, regulators may be interested in the ICP in the case of granting global export licenses, assessing the height of penalties, or in the context of authorized economic operator programs. There may also be certain interests in ICPs by other stakeholders, like branch, service and professional organizations, for certification or self-policing purposes.

***Papers, reports and cases***

To be announced through Moodle.

**Assessment**

Open book exam 100%



## **MODULE 8: MANAGING RELATIONSHIPS IN NON-COMPLIANCE CONTEXTS**

### **Administrative details**

Course director: Dr Job Timmermans.

Lecturer(s): Dr Job Timmermans, Prof. Dr Robert Beeres, Col. Dr Robert M.M. Bertrand RA RC RO, Prof. Dr Jeroen Klomp, Dr Tom De Schryver, Col. (ret.) Dr Joop Voetelink.

### **General objective**

The student understands, can elaborate and reflect on individual and organizational factors that motivate and underpin compliant (ethical) and non-compliant (unethical) behaviour. With specific regard to organizations in the context of strategic trade control, attention will focus on the consequences of (non-)compliant behaviour. Amongst others, students will gain insight into the proceedings and meaning of investigations into suspected trade law violation(s). Students learn how to handle a non-compliance investigation from an internal and external perspective.

### **Course objectives** (the numbers between the squared brackets refer to the exit qualifications of the master program)

The student will be able to:

1. understand, explain and discuss individual-level factors that motivate (un)ethical / non-compliant behaviour [1.7; 4.3];
2. understand, explain and discuss group and organizational-level factors that motivate (un)ethical / non-compliant behaviour [1.7; 4.3];
3. design and implement a crisis management strategy, including appropriate internal control measures [1.7];
4. evaluate processes, policies, and procedures that need to be in place to cope effectively with a compliance related investigation [1.7; 4.1].
5. understand the approach, mind-set, procedures, and tools of regulators in case of an investigation [1.7].
6. design an effective and efficient way to recognize, prevent and/or detect specific types of unethical (counterproductive) behaviour [4.1; 4.2; 4.3; 4.4; 4.5; 4.6; 4.7].

### **Course description**

This course studies the origins of (non-)compliant behaviour in organizations in the field of international trade in military- and dual use goods and services, the consequences for external relations with stakeholders, (inter)organizational performance, (good)governance and employee wellbeing and the regulatory mechanisms, available to compliance officers and management at large, to manage both compliance and integrity in organizations. Although non-compliant behaviour cannot be considered a “wrong” per se, the theoretical basis underpinning this course focuses on counterproductive workplace behaviour, i.e., a broad set of illegal, immoral, and/or deviant employee behaviours including offenses as employee theft, fraud, or corruption. Against this background, students will study aspects of a compliance officers role in non-compliance situations. Subjects include crisis management; internal investigations;

identifying individual-level, group and organizational-level causes; designing and implementing the right control measures; communicating non-compliance with regulators, government officials and other stakeholders. Students conclude the course by producing a Problem Oriented Policing (POP) guide that describes, analyses, and develops a plan to detect and/or prevent a specific type of counterproductive workplace behaviour relevant in the context of compliance and integrity in international military trade.

### **Course structure and method**

The course is conducted at level 500 and amounts to 5 ECTS. 1 ECTS equals 28 hours of study load. Education is based on the preparation-feedback model.

### **Literature**

#### ***Books***

Braga, A. A. (2008). *Problem-oriented policing and crime prevention* (2nd ed.). New York: Willow Tree Press. (*Chapters 1 and 2*)

Elias, S.M. (2013) *Deviant and criminal behavior in the workplace*

#### ***Papers***

To be announced through Moodle.

### **Assessment**

Assessment of the course is based on the delivering of POP-guide report by groups of 2 students (80%) and presenting of one stage of the POP guide by the same group, and leading a discussion of one of the other groups' presentation (20%).

## **MODULE 9: INTEGRATION PROJECT RELATED TO ASPECTS OF ICP IN BUSINESS ENVIRONMENTS**

### **Administrative details**

Course director: Prof. Dr Robert Beeres and *drs.* Koen Smetsers

Lecturer(s): Prof. Dr Robert Beeres; Col Dr Robert Bertrand RA RC RO; Esmee de Bruin MSc LL.M.; prof. Dr Jeroen Klomp;; Dr Tom De Schryver; *drs.* Koen Smetsers; Dr Job Timmermans; Col. (ret.) Dr Joop Voetelink.

### **General objective**

The student is able to use state of the art scientific knowledge and new insights in order to analyse the need for and able to design an effective and efficient Internal Compliance Program (ICP) or Code of Conduct (CC) based upon a real-life case.

### **Course objectives** (the numbers between the squared brackets refer to the exit qualifications of the master program)

The student is able to:

1. use state of the art scientific knowledge and new insights to understand relevant managerial themes and questions regarding strategic trade control of international trade in military and dual use goods and services [1.1-1.7];
2. understands the key components of an Internal Compliance Program [3.1];
3. compose and analyse an organizational compliance risk profile and, accordingly, to define adequate internal controls and safeguarding measures [3.2];
4. define system requirements for an Internal Compliance Program or Code of Conduct depending on particular organizational contexts [3.3];
5. (re)design an Internal Compliance Program or Code of Conduct adequate for the specific requirements of an organization [3.4];
6. abstract, analyse, structure and relate complex data into relevant information to identify underlying core questions and themes to gain an overall picture [4.1-4.4];
7. communicate ideas, perspectives and findings, both orally and in writing within the professional field [5.1-5.4].

### **Course description**

During the course students, individually, engage in applied research on (one of) the Internal Compliance Program(s) or Code of Conduct at their workplace. The emphasis is on organization diagnosis and re-design to improve, innovate or even to develop this particular ICP or CC. Students will conduct their research from an interdisciplinary and practice-oriented perspective.

Key elements of an ICP/CC to be taken into consideration, include:

1. levels of commitment to compliance (i.e., commitment from senior management to comply with (inter)national strategic trade controls);
2. organizational structure and (division of) responsibility/accountability (e.g., designation of a senior organization member to ensure implementation and maintenance of the ICP);

3. applicability/feasibility/awareness of export screening procedures (i.e., an overview of detailing company compliance policies and procedures);
4. (Facilities and policies regarding) training & education (i.e., training, courses etc. provided to employees dealing with different aspects of processing exports; including e.g., granted study time);
5. Screenings of all aspects of dual-use goods or services for export (i.e., products, end users and end-use);
6. Record keeping (i.e., adhering to national strategic trade control legislation record keeping requirements);
7. Established policies, procedures and rules for conduct regarding internal audits and compliance monitoring;
8. Established policies, procedures and rules for conduct regarding handling and resolving compliance problems and violations.

During this module students will diagnose and (re)design (part of) their own organization's ICP/CC. To this end, students will 1) select 3-5 key elements to focus on; 2) select appropriate literature offered in previous modules underpinning their decisions; and 3) motivate choices made under 1) and 2).

During the preparation phase students will work independently on their diagnosis and (re)design according to the key elements of their choice. This will result in a paper to be submitted to the supervisor in week 5 (see assessment requirements). During the contact week (feedback phase) students will individually present their diagnosis and (re)design of the ICP/CC and defend their decisions and judgements in class in an in-depth discussion. Each student will be allowed 30 minutes for presentation followed by 30 minutes for discussion. Based on the feedback from this discussion students will adapt their diagnosis and (re)design.

### **Module structure and method**

The module is conducted at level 600 and amounts to 5 ECTS. 1 ECTS equals 28 hours of study load. Education is based on the preparation-feedback model.

### **Literature**

All literature from preceding modules

### **Assessment**

Paper: diagnosis and (re)design of ICP (70%)

Presentation (30%)

## MODULE 10: MASTER THESIS

### Administrative details

Course director: Prof. Dr Jeroen Klomp

Lecturer(s): Prof. Dr Robert Beeres; Col. Dr Robert Bertrand RA RC RO; Prof. Dr Jeroen Klomp; Dr Job Timmermans; Dr Tom De Schryver; Col. (ret.) Dr Joop Voetelink.

### General objective

The student is able to generate new academic insights and to carry out independent theoretical or applied scientific research within the interdisciplinary domain of Compliance and Integrity in (Inter)national Military Trade, including strategic trade control of military / dual-use goods and services.

### Course objectives (the numbers between the squared brackets refer to the exit qualifications of the master program)

The student will be able to:

1. formulate a research problem, a conceptual design as well as a conceptual model and to gather literature [1.1-1.7; 2.1];
2. make responsible and well-argued theoretical and methodological choices [2.2];
3. formulate a research design (i.e., select relevant empirical research strategies, data collection and –analysis methods) [2.3];
4. apply both qualitative and quantitative methods and techniques for data collection and –analysis [2.4];
5. write consistent and coherent research reports [2.5];
6. reflect critically on theoretical, methodological and empirical decisions [2.6]; and
7. consider, reflect and account for their own learning *bildung* and actions [6.1-6.4].

### Course description

The master's thesis is the final test of academic skills and the culmination of the CIIMT program. From the thesis, it becomes clear that students have mastered CIIMT's intended learning outcomes, internalized these and made them their own to apply. This appears from the student's:

1. knowledge, understanding and skills in relation to his/her specific field of study;
2. theoretical and methodological insights into the field;
3. capabilities to apply these insights independently;
4. capabilities to carry out research according to academic standards and of developing his own perspective on the materials studied.

Based on the above, the student

5. can be expected to continue to contribute to the generation of new academic insights and to carry out independent research.

Before starting the actual thesis research and writing, students develop their own individual research proposal (IRP). This IRP encompasses the conceptual design, conceptual model and a

research design and will be produced during the preparation phase. Next, during the first three days of the contact week, in feedback rounds, IRPs will be discussed and commented upon in groups of four students, supervised by an experienced researcher. On the fourth day of contact week, discussion focuses on the way ahead concerning actions to be undertaken by the students regarding the literature framework and the planning of data collection, and –analysis. On the last day of contact week, students are thus able to submit an IRP that is relevant, effective and feasible. Last, as to feedback on intermediate milestones, during the thesis process student and supervisor make separate appointments to discuss chapter 1 introduction, chapter 2 theory, chapter 3 methodology, chapter 4 results and chapter 5 discussion and conclusion.

### **Course structure and method**

The course is conducted at level 600 and amounts to 15 ECTS. 1 ECTS equals 28 hours of study load. Education is based on the preparation-feedback model.

### **Literature**

- The thesis portal in Moodle offers the CIIMT thesis guide 2019-2021. This guide explains regulations and policies regarding the thesis process as well as the assessment rubrics.
- All literature from preceding modules, in particular module 7 Research methods.
- Additional literature depends on choices made in the definite IRP and further arrangements (to be kept) between the supervisor(s) and the student.

### **Assessment**

Thesis (100%). See the assessment form in CIIMT thesis guide 2019-2021.

# Annex A: Preliminary schedule cohort 2021-2023

	2021							2022																																			
	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa	Su															
sept	35							36							37							38							39														
			We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa	Su	
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30											
					Intro							Independent learning M1							Independent learning M1							Independent learning M1							Independent learning M1										
oct	39							40							41							42							43														
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## Annex B: Program objectives

<b>Generic attainment level 1:</b>		<b>Dublin descriptor</b>
Each CIIMT graduate is able, to use state of the art scientific knowledge and new insights to understand relevant managerial themes and questions regarding strategic trade control of military and dual-use goods and services		Knowledge and insight
The graduate:		
1.1	From a defence economic perspective can elaborate and reflect on factors that influence international trade in military and dual-use goods and services and the conditions determining whether such international trade will be beneficial and to whom;	
1.2	Understands the relevance of law and legal knowledge for managers and is able to reflect on the interrelatedness between law and business in an international context. Thereby developing the legal awareness required to analyse export compliance aspects of international trade in defence markets;	
1.3	Understands key concepts in (inter)national law and regulations that govern trade in military / dual-use goods and services, and developments thereof, as well as the aims and functioning of institutions in the field of arms control, and can identify the most important export/import laws and regulations as well as their effects on organizations operating in the context of international trade of military and dual-use goods and services.	
1.4	Understands, can elaborate and reflect on relevant and recent theories and models for managing compliance and integrity in (military) organizations, with specific attention to organizations in the context of strategic trade control. Ethical and organizational insights gained from this course serve as input to module 5 and 6;	
1.5	Has a broad understanding and knowledge concerning theoretical and practical elements relevant to develop an Internal Compliance System. The graduate can apply both knowledge and skills to set-up an effective and efficient Internal Compliance System for organizations in the field of trade compliance. He/She can motivate and substantiate choices made in the design of an Internal Compliance System;	
1.6	Has knowledge of all theoretical and practical elements that are relevant to monitor and audit an Internal Compliance System. The student can apply the knowledge and has the skills to effectively and efficiently plan, perform, report on audits of an Internal Compliance System for any given organization (both operational and compliance audits). He/She can motivate and substantiate choices made in the	

	different stages of the audit process. The compliance audits can aim for assurance as well as to provide advice for improvements of an Internal Compliance System;	
1.7	Understands, can elaborate and reflect on individual, organizational and cultural factors that motivate and underpin compliant (ethical) and non-compliant (unethical) behaviour. With specific regard to organizations in the context of strategic trade control, attention will focus on the consequences of (non-) compliant behaviour. Amongst others, students will gain insight into the proceedings and meaning of investigations into suspected trade law violation(s). Students learn how to handle a non-compliance investigation from an internal and external perspective.	

<b>Generic attainment level 2:</b>		<b>Dublin descriptor</b>
Based on knowledge and insights, each CIMMT graduate is able to generate knowledge on strategic trade control of military useful goods and services –both independently and in cooperation with others		Applying knowledge and insights as an academic researcher
The graduate is able to:		
2.1	Independently formulate a problem, research model as well as a conceptual model and to gather literature;	
2.2	Make responsible and well-argued theoretical and methodological choices;	
2.3	Independently select relevant empirical research strategies, data collection and –analysis methods;	
2.4	Apply both qualitative and quantitative methods and techniques for data analysis;	
2.5	Write consistent and coherent research reports;	
2.6	Reflect critically on theoretical, methodological and empirical decisions	

<b>Generic attainment level 3:</b>		<b>Dublin descriptor</b>
Each CIIMT graduate is able to design an effective and efficient Internal Compliance program for the own organization		Applying knowledge and insights as an academic professional
The graduate:		
3.1	Understands the key components of an Internal Compliance Program;	
3.2	Is able to compose and analyse an organizational compliance risk profile and define adequate internal controls and safeguarding measures;	
3.3	Is able to define system requirements for a compliance program depending on the specific organizational context;	
3.4	Is able to design a compliance program adequate for the specific requirements of an organization;	

3.5	Is able to evaluate the reliability, effectiveness and efficiency of an existing compliance program, define needs for optimization and advice management thereon;	
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<b>Generic attainment level 4:</b>		<b>Dublin descriptor</b>
Each CIIMT graduate is able to abstract, analyse, structure and relate complex data into relevant information to identify underlying core questions and themes to gain an overall picture		Forming judgements
The graduate is able to:		
4.1	reflect critically on a course of action, measures or decisions based on theories and models;	
4.2	(is able and) aware of the need to account for the own courses of action;	
4.3	To distinguish aspects from various domains when studying a problem as well as to integrate these aspects;	
4.4	Critically assess existing research and reflect on the findings;	
4.5	Question research assumptions and findings;	
4.6	Assess organizational and societal implications;	
4.7	Form a judgment regarding ethical, normative and societal impact regarding international trade in military useful goods and services	

<b>Generic attainment level 5:</b>		<b>Dublin descriptor</b>
Each CIIMT graduate is able to communicate ideas, perspectives and findings, both orally and in writing in English and Dutch, both in an academic context as well as within the professional field.		Communication
The graduate is able to:		
5.1	Cooperate effectively and professionally within various groups, thereby acknowledging different interests, positions and roles;	
5.2	Express ideas and visions in reference to the target group;	
5.3	Deliver a well-structured presentation on independent or group work regarding research or a problem in the field, both in Dutch and in English;	
5.4	Use a variety of (mostly ICT-) tools in adequate communications	

<b>Generic attainment level 6:</b>		<b>Dublin descriptor</b>
Each CIIMT graduate is able to consider, reflect and account for their own learning, <i>Bildung</i> and actions.		Learning skills
The graduate is able to:		
6.1	Independently gain and apply knowledge;	
6.2	Reflect critically on theories and methods in use;	

6.3	Reflect and assess critically his/her own findings and courses of action;	
6.4	Become aware of a need for life-long learning	

## Annex C: Privacy regulations

The Faculty of Military Sciences (FMS) of the Netherlands Defence Academy respects the privacy of students and staff of the FMS and will treat personal information in accordance with the General Data Protection Regulation (GDPR), or the *Algemene Verordening Gegevensbescherming* (AVG).<sup>3</sup> This regulation describes how the FMS handles personal information of her students and what the student's rights are concerning his personal data.

The FMS handles and treats (special)personal information of its students in accordance with the GDPR and AVG.<sup>4</sup>

The Security Officer/ Coordinating Officer AVG of the Netherlands Defence Academy will supervise the handling of personal data by the FMS is in compliance with the GDPR/AVG.

### 1. Types of Personal Data

The following (special) personal data can be handled by the FMS:

- Name and address, email address, telephone number, data and place of birth, passport photograph, correspondence number OC&W, Social Security Number (BSN), a copy of an identification document, diploma of undergraduate and graduate education, VOG/VGB.<sup>5</sup>
- Study results and progress data;
- Special personal data (concerning health and wellbeing) required for providing an adequate learning environment of the student;
- Insurance information of students in case of travel abroad related to the study;
- Additional legally obligatory personal data based on specific legislature, i.e. *Wet op het Hoger Onderwijs en Wetenschappelijk Onderzoek* (WHW)

### 2. Purpose of Administration

The FMS uses personal data only for the following purposes:

- Enrolment into the master program and registration of study progress and study results;
- Administration of study results, study progress and information related thereto;
- The dissemination of requested education information;
- The implementation and improvement of educational services;
- Information on congresses, seminars with a relation to the field of study;
- Generation of educational statistical data;
- Evaluation and accreditation of the program;
- The support of faculty, Board of Examiners, Program Board, and FMS management.

The personal data provided by students will only be used for the above described purposes. Other use of personal data can only occur after consent from the student. Special personal information concerning health and wellbeing can only be shared with faculty and others after consent of the student involved.

### 3. Rights of Students

The students involved have the following rights in accordance with the GDRP/AVG:

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<sup>3</sup> Ratified per 25 May 2018

<sup>4</sup> The AVG differentiates between personal information (Name and address data) and special data, i.e. concerning data on a student's health

<sup>5</sup> VOG: *Verklaring Omtrent Gedrag*, a Statement of Conduct, provided by the local municipality. VGB: *Verklaring Geen Bezwaar*, a Statement of Conduct, provided by the National Intelligence Community.

- Right of inspection: students can forward a request to the Head of the Faculty Administration to get a statement of the personal data kept on record;
- Right of correction: if personal data is used incorrectly, the student can submit a request to correct with the Head of the Faculty Administration;
- Right 'to be forgotten', former student can request the Head of the Faculty Administration delete their data from the FMS administrative systems. Some technological and/or legal restrictions may apply (i.e. archive laws);
- Right on transfer of data, students can request the Head of the Faculty Administration to transfer their personal data to an organisation or institute provided by the student.

#### **4. Sharing Personal Information Externally**

For the administration of personal data the FMS can make use of external service providers, contracted by the FMS (i.e. educational support like Moodle and/or OSIRIS). These contractors provide their services based upon a contract, specifying the handling of personal data. Other than these providers will personal data not be shared unless obligated based on the law (i.e. WHW)

The FMS ascertains, together with its contractors, an adequate organisational and technological architecture to safeguard the personal data. This will guarantee the personal data is only available to those who need access based on their function and limited only to specific and necessary elements of the personal data. The FMS guarantees the personal data will only be used for purposes related to the reason on collection, based on legitimate grounds.

#### **5. Reporting Data Breach**

If someone suspects that unauthorised persons have access to personal data of the FMS, this is to be reported by the Security Officer / AVG Officer of the Netherlands Defence Academy. This will initiate the procedure to analyse, solve, and report a breach of data

## Annex D: Code of Conduct

### 1. Objective

This section is based on the declaration A984 '*Integriteitsbeleid Defensie*' of the Secretary General of the Ministry of Defence (MoD) and tailored for use in the master program Compliance and Integrity in International Military Trade. This Annex does not replace the declaration but should be read as an abstract of that document and it also contains more detailed information. This Code of Conduct (CoC) is applicable for all personnel of the MOD. This also includes students, staff, and faculty of the Faculty of Military Science.

In this Annex, the PB of the master CIIMT intends to:

- Foster professionalism and responsibility in the education realm;
- Promote manners supporting a safe learning environment.

Infringements to the CoC can be reported according the A984 and subsequently researched.

### 2. Code of Conduct Ministry of Defence.

The Ministry of Defence Code of Conduct contains the fundamental values that govern how we behave towards one another, towards others and how we deal with the resources and authorities entrusted to us. These values apply to everyone, in barracks, on deployment, and at the top of the organisation. By stating them in clear language, we make clear what we stand for, what we expect from each other, and what others can expect from us.

This does not limit the capacity of supervisors and employees to generate additional rules of conduct and it does not limit the maintenance of the '*tuchtrect*' for military personnel or the measures taken in relation to misbehaviour by military or breach of duty by civilian personnel.

- 2.1. Solidarity: I cooperate, help others, am open to feedback and give feedback to others.
- 2.2. Safety: I work safely. When I become aware of unsafe or unacceptable behaviour, I address it or report it.
- 2.3. Reliance: I ensure that my co-workers and society can rely on me.
- 2.4. Responsibility: I demonstrate proficiency and take responsibility for my work.

### 3. Basic Rules of Integrity

In addition to the CoC MOD some basic rules have been established to address the educational environment of the master program Compliance and Integrity in International Military Trade.

- 3.1. Wanted behaviour. The MOD is responsible for creating and maintain a safe and secure working environment for its employees and students alike. The way co-workers interact is laid down in the CoC. One of the items described is the respect and dignity staff and students exercise in their interaction.

A safe learning environment is inseparable from a safe teaching environment. The master CIIMT strives for interaction on intellectual content, in which student and lecturer both need to fulfil their role.

Within the MoD organisation (affectionate) relationships can occur. The persons involved are to ensure no boundaries are crossed without consent. The following guidelines are to be adhered to:

- Be open and honest about relationships;
- Relationships within a department should be reported to the supervisor;
- In case of a hierarchical relation between the persons involved, sexually tainted advances and sexual relationships are not allowed.

- 3.2. Handling of confidential information. Every member of the faculty (students and staff alike) should have their privacy protected and this warrants all involved to carefully handle personal information as laid down in the General Data Protection Regulation

(GDPR). This limits the use of personal data to the purpose of the initial collection. The GDPR also limits the access to the data and provides guidelines on how personal data is to be stored.

#### 4. Preserving Integrity

For students, faculty and supporting staff within the master CIIMT the following bodies have been established to address unwanted situations:

- Student members of the Program Committee or the Program Board can also be approached concerning concerns on integrity;
- The Program Coordinator is – as a mentor – the first point of contact for the students, he can either consult the confidants of the Netherlands Defence Academy himself or refer to the body of confidants;
- Students are free to contact and address members of the faculty;
- Faculty can consult the program coordinator, the Program Board or one of the confidants of the Defence Academy;
- The *Centrale Organisatie Integriteit Defensie* (COID), as the MoD centre of expertise, can be used as well.

#### 5. How to report

5.1. Within the MoD the starting point for reporting issues concerning integrity or unwanted behaviour is one's supervisor or the supervisor of the person being reported on. If the person reporting wishes to address the issue higher up the command line, he is free to do so.

5.2. Reporting to the COID. If, for any reason, the reporter does not want to contact any of the supervisors, the situation can be reported to the COID directly. An employee of the COID will discuss the steps to follow with the reporting colleague. Externals can address unwanted behaviour or a breach of integrity to the supervisor of the defendant or directly to the COID.

5.2.1. Reporting to the COID through the service desk MoD: 0800-2255733 or \*06 733 option 4. (From abroad +31704143300). To contact COID directly, call +31613710276 or use email: [COID@mindef.nl](mailto:COID@mindef.nl)

5.3. If an employee of the MoD feels the MoD failed not follow up on the reporting adequately, the situation can be reported with the *Huis voor Klokkeluiders* or in case of any wrongdoing the *Nationale Ombudsman*. Both organisations will first evaluate the steps taken by the MoD before starting an investigation themselves.