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Loyalty – a grey virtue?

Peter Olsthoorn and Marjon Blom-Terhell

1. Introduction

In the early morning of 16 March 1968 a US Army company left for the village of My Lai (better known among the Americans as Pinkville). The village was supposedly full of Viet Cong fighters and sympathisers, but on arrival that turned out not to be the case. Despite the absence of any armed resistance, the American soldiers, led by Lieutenant William Calley, began to execute the defenceless population in groups. In the end, about four hundred civilians were killed. Strikingly, no less than two-thirds of the company's troops participated in the killing (McDermott and Hart, 2017, p.27). Helicopter pilot Hugh Thompson Jr. flew over the village that day and saw, in addition to the dozens of dead, how the surviving villagers were herded together and killed. Thompson landed his helicopter between some of his American colleagues and a group of fleeing Vietnamese, because it was clear that the latter group was about to be killed by the first. Before he disembarked, Thompson ordered his crew members to fire on their own troops if they did not stop shooting the villagers. Thompson eventually succeeded in rescuing this group. The fact that it was a relative outsider like Thompson who intervened should come as no surprise: in many cases of moral disengagement (see Chapter 3), someone

external, who is therefore not part of the group, is the first to see that something is wrong.

Thompson reported on the massacre that same day. The US military initially tried to cover up this story for quite some time, and was more or less successful, until other US service personnel also informed journalists and politicians about the events. Thompson is now seen as a hero, and has been decorated for his role. That story is quite well-known now. Less known, however, is the fact that he had to wait thirty years for it. His intervention and reporting on colleagues was viewed initially with nothing but disapproval. Thompson was threatened for years afterwards and his career was sidelined. He was given the most dangerous assignments and was shot four times in Vietnam. In the opinion of Mendel Rivers, Chairman of the House Armed Services Committee, the only person deserving of punishment for My Lai was Thompson (see, *inter alia*, Angers 2014). In the meantime, the real culprits remained virtually unpunished, partly due to pressure from public opinion. Thompson was rehabilitated only much later, and went on to give lectures to US Armed Forces audiences about the importance of moral courage. Only one of the perpetrators, Lieutenant Calley, was sentenced to prison. Again under pressure from public opinion, his prison sentence was soon commuted to house arrest by President Nixon.

Ten months after the My Lai massacre (but about ten months before that massacre finally made the news), on Friday 17 January 1969, Dutch psychologist and former conscript Joop Hueting gave a television interview. In this interview, the former conscript recounted how Dutch soldiers committed serious war crimes in the Netherlands East Indies in the years following the Second World War, such as shooting innocent civilians and mistreating detainees. Hueting: 'An example – we got POWs and they were shot several times, the catchword being: "Go and have a piss," whereupon they turned around and were shot in the back.' Another incident occurred when Hueting and his colleagues

arrived at a *kampong*, in the middle of which was a little house. Two of our boys, a corporal and a private went inside, and the corporal emptied his submachine gun there. I went inside and in the half-light I saw fifteen, twenty people, women, children and men. When I was accustomed to the dark, I saw blood spurting from arterial wounds, screaming, mortal agony and the dying screams from the people in that house. And the guys outside were yelling at us: 'Can you be careful please, you're gonna shoot us in the butt right through that wall.'^{*}

Hueting, who admits that his own actions in the former Dutch colony were not beyond reproach, emphasised that such cases were not incidents, but more common occurrences. Hueting's revelations about the misconduct of Dutch soldiers during the so-called 'police actions' came after more than twenty years of silence about the dubious goings-on at the time. Letters previously written to newspapers by Hueting were never published. What makes him special is that he did not give up and kept on telling the story that nobody wanted to hear.

Particularly striking were the often downright negative reactions to the interview. A few days afterwards, a major newspaper denounced the television appearance in a chief editorial comment. According to the morning paper, 'Mr Hueting's utterly senseless, disproportionate highlighting of incidental atrocities is reprehensible'. What had an even greater impact on Hueting was the fact that many veterans were furious, and even threatened him. Hueting was even forced to go into hiding with his family in a rural area, the Veluwe, and his children went to school under police escort.^{**} Hueting died in late 2018, but appeared posthumously in a

* These quotes from Hueting can be found here: <https://anderetijden.nl/programma/1/Andere-Tijden/aflevering/551/De-excessennota>.

** Hueting's television appearances led to the so-called '*Excessennota*' (Excesses Memorandum), the Dutch government's first investigation into the decolonisation war in the Netherlands East Indies.

documentary series in which Hueting and other East Indies veterans talk about their experiences during those 'police actions'. Some of Hueting's former colleagues were now more open about the things that went wrong. Remarkably however, almost all veterans who talked in the series about Hueting's interview were still angry with him.*

What happened to Hueting brings us to an important point: in much of the literature dealing with matters such as integrity and moral courage, sticking to your beliefs is rewarded. The person who keeps to his or her principles will, albeit after suffering some discomfort, be held in esteem by the authorities, keep his or her job or even be promoted.** In the real world, however, things often turn out badly for people who stand up for their principles against the interests of the organisation and their colleagues. At best they are ignored, but sometimes they have to fear for their lives and go into hiding. Significantly, many whistleblowers strongly advise others not to take similar steps. A report on (the lack of) social safety at the Dutch Defence organisation also concludes that not reporting abuses is the sensible choice for Defence personnel. This is not a recommendation but rather a factual conclusion: 'More than 75% of people who reported to the committee indicated that whistleblowing - whether about socially undesirable behaviour or matters of professional integrity - resulted in (more) disadvantageous treatment' (Giebels, Van Oostrum and Van den Bos 2018, p. 17). Such disadvantageous treatment may consist, for example, of public humiliation whereby the loyalty and reliability of the whistleblower is questioned (Giebels, Van Oostrum and Van den Bos 2018, p.18). The report therefore found that there appears to be a good chance 'that whistleblowing or filing a complaint actually means the end of your career' within the Defence

* NPO, *Onze jongens op Java*, episode 3, available for viewing at https://www.npostart.nl/onze-jongens-op-java/05-12-2019/BV_101395136.

** Rushworth Kidder's *Moral Courage* (2005) is full of such examples, where all ends well for everyone involved.

organisation (Giebels, Van Oostrum and Van den Bos 2018, p. 63). Until that situation changes, attempts to increase the willingness to report seem doomed to failure (and perhaps irresponsible, too). The fundamental question arising here is why someone who legitimately and for good reason calls attention to an abuse mainly suffers disadvantage as a result. Although that question cannot be answered unequivocally, loyalty often seems to play a major role in this respect. The whistleblower is not only blamed for the 'damage' done to the interest of the group or organisation, but also and particularly for being disloyal. Disloyalty appears to provoke universal disapproval: a disloyal Nazi might thus provoke more antipathy than a loyal one (Ewin 1992). But if disloyalty is so reprehensible, does that imply that loyalty is always good?

The remainder of this chapter addresses that virtue of loyalty – if the term 'virtue' is even appropriate here – and the role loyalty plays in the moral issues that soldiers encounter in their work. In the next section we will describe what loyalty is, distinguishing two different forms of loyalty: loyalty to one's own group and loyalty to a principle or profession. The subsequent section illustrates the argument by addressing a specific loyalty problem: dual loyalty. The last section before the discussion focuses on the question of how loyal it really is to expect loyalty from your colleagues.

2. What is loyalty?

The example of Hueting shows that loyalty features prominently in the military profession – as in fact it does in all professions in which group formation and socialisation play a major role. But what is loyalty? The fact that this question is not easy to answer is mainly because the term loyalty can mean different – and sometimes conflicting – things. The form of loyalty we saw above among Netherlands Indies veterans is loyalty to one's own group. In this particular case that group consisted of fellow soldiers, but the group may also consist of

one's own family, tribe or people. Loyalty to such a group means that the interests of that group take precedence over the interests of others, even if they actually should not (Ewin 1992, p. 406). The latter occurs, for example, if someone protects fellow group members when they commit a serious error. The form of loyalty motivating Hueting was loyalty to a principle – which has a much wider scope. This broader form of loyalty plays a much more limited role in most armed forces than that of loyalty to colleagues and the organisation.

The fact that different people interpret the term in different ways means that they have different ideas about what loyalty requires from someone – Hueting undoubtedly felt that he was also being loyal in his own way. Many morally difficult situations arise because loyalty to the group makes demands that are often at odds with the requirements of loyalty to a principle. Incidentally, most ethicists value loyalty to principles more highly: in their view, group loyalty presupposes the suspension of a person's own independent judgment (Ewin 1992, p. 412). For this reason, loyalty is sometimes referred to as a 'grey' (Miller 2000, p. 8) or instrumental (Coleman 2009, p. 110) virtue: whether it really is a commendable quality depends on what one is loyal to and what the consequences are. So if loyalty is not by definition a virtue, then we should also question whether an absence of loyalty is a vice. It makes quite a difference whether someone is loyal to his or her group or organisation, or to a profession or principle. It could be argued that Hueting and other whistleblowers are loyal to their profession or to their principles, but not to their group and organisation, or at least not at any cost.

Furthermore, there is another reason why applying the term 'virtue' to loyalty is questionable: it might be better to refer to loyalty as a value. Although both concepts are sometimes used interchangeably, they are in fact different. A value is an ideal, a principle or an inner conviction (see Chapter 1). It is 'something' that you strive for, but that lies outside yourself. A virtue is a valuable character trait that you acquire through practice and have entirely internalised. By way of an example:

equality is a value, courage is a virtue. Confusingly though, the concepts of virtue and value at times approximate each other very closely, because some traits that we consider as moral virtues also function as values. Justice is a good example: it is both a virtue and a value. We appreciate it as a personal trait, but also see its importance in society. Loyalty may also be an example: we appreciate it as a trait, but may also feel that it should play a role in our society or the organisation we work for. We will return to this later. Incidentally, most armed forces refer to virtues as well as values when discussing matters like bravery, discipline and loyalty, as if the terms were interchangeable. The term virtue fits best with what they seem to envisage: qualities that can be acquired through training and education. Then the question is, of course, what those qualities should be.

Featuring prominently on the virtues list of most armed forces are virtues that promote military effectiveness, such as bravery, obedience and loyalty. To an extent, these virtues are functional and mainly focused on the organisation's and the mission's interests. That is the reason why soldiers like seeing those virtues in fellow soldiers. They are not necessarily virtues requiring soldiers to have consideration for people outside the organisation, such as the local population in a deployment area. This has always been the case; however, it is remarkable that in recent years some armed forces have tended to place a greater, rather than a lesser, emphasis on martial identity. An example in the English-speaking world is the term 'warrior' which is supplanting the term 'soldier'. Ironically, this may be a reaction to the increasingly frequent deployment of military personnel to new, more humanitarian tasks that leave less room for being a 'warrior' (see also Robinson 2007).

The Netherlands armed forces do not in fact have such a concrete list of virtues, but what they do have is a code of conduct. This code of conduct was renewed in 2018 and now refers to the values of 'connectedness', 'safety', 'trust' and 'responsibility'. A noteworthy feature of this code of conduct is that it mainly aims to regulate the interaction between

military personnel themselves. So ultimately, this code of conduct is oriented more towards protecting military personnel against bullying, sexual harassment and discrimination by colleagues than towards protecting, for example, the local population in a deployment area. This inward focus of many of the virtues lists and of the Dutch code of conduct is in line with armed forces' tendency to set the greatest store by group loyalty.

A similar phenomenon can be witnessed when soldiers take an oath or affirmation upon their enlistment or commission, in which they swear or affirm allegiance to the constitution, their country and/or the head of state. The 'client' of the military professional is not, or at least not initially, the civilian in the deployment area. For Dutch military personnel this oath or affirmation reads: 'I swear (affirm) that I will bear allegiance to the King/Queen, that I will obey the laws and that I will submit to military discipline. So help me God (I affirm this)' (Article 126a of the General Military Civil Servant Regulations).

In addition to the military oath or affirmation and the code of conduct, the various units within the Netherlands armed forces have their own core values. These core values partly correspond to the 'virtues lists' of other countries. The Commando Corps of the Royal Netherlands Army, for example, mentions bravery, leadership, faithfulness, honour and pride. In that context, faithfulness is understood to mean: faithfulness to your mission, faithfulness to your comrades, faithfulness to the Corps and faithfulness to yourself.* This corresponds to loyalty as described above. The Marine Corps of the Royal Netherlands Navy mentions connectedness, strength and dedication, where connectedness is defined as 'the most powerful weapon to overcome danger, fear and stress during operations. This special connection is based on loyalty and respect for each other and each other's opinions.'*

* See <https://www.korpscommandotroepen.nl/korps/kernwaarden-van-het-korps-commandotroepen/>

* See <http://de-mariniers.korpsmariniers.com/de-marinier/korpswaarden/>

Here, too, loyalty features strongly. In brief, when soldiers talk about loyalty within the armed forces, they are talking mainly about faithfulness. They are faithful to the political leadership, to the organisation, to their mission and, most of all, to each other. This is reflected in the so-called 'can-do' mentality of soldiers. 'To keep going where others give up' is a motto soldiers often use, and frequently live up to as well.

Sometimes that faithfulness to, and protection of, each other also comes into play when unacceptable events take place. In Somalia in 1993 a number of Canadian airborne troops, who are known for their strong group loyalty and had previously been in the news because of their hazing rituals (Winslow 1999), beat to death a Somali teenager, Shidane Arone, who had slipped into the camp. A reconstruction in court revealed that at least sixteen colleagues must have witnessed or heard this, but not a single one had intervened. In a move not dissimilar to My Lai, the Canadian Department of National Defence covered up the incident. When the incident was eventually revealed, Canada disbanded the unit (Winslow 1999). A more recent example is that of Joe Darby, the US Military Police sergeant who in 2004 handed over two CDs with the now famous photos of abuses in Abu Ghraib prison to the authorities. By doing so, he was denouncing an obvious abuse, but at the same time his actions resulted in lengthy prison sentences for some of his colleagues. Integrity, another frequently cited military virtue, conflicts with loyalty to colleagues in this case: integrity and loyalty are two different things which set requirements that are sometimes incompatible. For Darby, acting with integrity, in the sense of doing what your personal values and moral standards tell you to do (and, in that sense, integrity resembles loyalty to principles), carried more weight than loyalty to his military colleagues. It should be noted in this respect that integrity features as often on the list of virtues of various countries' armed forces as do bravery and loyalty. Although the US Army also mentions integrity as one of its seven values, Darby did not fare well as a result of his action. Despite Darby having been assured of anonymity in exchange for his cooperation,

his name was disclosed at a press conference by Secretary of Defense Donald Rumsfeld. Many colleagues were so resentful about Darby's alleged disloyalty that the US military authorities had to move Darby and his wife to a secret location. In that respect, not much has changed since the times of Hueting. Rumsfeld went on to write to Darby asking him to stop saying that he, Rumsfeld, had revealed Darby's name. Darby did not comply with this request (Rather 2012). Lastly, a 2006 report on the mental state of US soldiers in the same Iraq war showed that only 55 percent of soldiers were prepared to report a colleague who had injured or killed an innocent non-combatant. At 40 percent, this percentage is (even) lower for marines (Mental Health Advisory Team IV 2006). It seems that the closer-knit unit, the more difficult it is for unit members to signal obvious abuses.

3. Dual loyalty

Thompson, Hueting and Darby put principles before colleagues and organisation. Although the situation in which they found themselves seems exceptional, there are professions in which conflicts between group loyalty and principles are sometimes inevitable. Examples may help to clarify this, while at the same time shedding light on the unique nature of the military profession. As we have seen, military personnel take an oath (or affirmation), the Defence organisation has a code of conduct and various services and units have their own core values. Oaths, codes of conduct and core values communicate clearly what an organisation or unit considers important. And that appears to be mainly the interest of the organisation and colleagues. In that sense, the military profession is rather different from the medical profession: the medical oath (and medical ethics in general) is outwardly oriented and focuses on the patient. The interests of colleagues and the hospital are subordinate to this. *Military* medical personnel are in a special position in that they take two oaths:

the medical oath and the military oath. Sometimes this will place military medical personnel in a difficult position in which two forms of loyalty conflict. We regularly see instances where medical and military ethics are difficult to reconcile. For example, there is the case in Guantanamo Bay where medical personnel failed to intervene during an unlawful interrogation which they attended to advise the commanders. As a result of hours-long interrogations, prisoners were at risk of sustaining permanent injury due to lack of sleep, among other things. They failed to make reports of this and even cooperated in the abuse of detainees (Clark 2006). Medical personnel in Guantanamo Bay were loyal to their colleagues and to their country (provision of information), but not to medical ethics. Again we see that different loyalties may clash. We also see this dual loyalty among Dutch military medical personnel. They are regularly confronted with dilemmas in deployment areas, albeit of a different kind from the example of Guantanamo Bay.

Since 2002, Dutch military personnel have assisted in improving security in Afghanistan, particularly in Uruzgan province and later in Kunduz. An example of a dilemma in this context: a vehicle on patrol hits an improvised explosive device, and a general military nurse in a vehicle behind it sees this happen. Several people are injured and the military nurse faces a difficult choice: who should she help first, a badly wounded insurgent, a local bystander, or a slightly injured colleague? A Dutch general military nurse deployed to Afghanistan stated that although the rules prescribe that a more severely wounded Taliban warrior should be cared for before a less severely injured colleague, this nurse would still choose to help the colleague first in such as case.

I myself experienced having two wounded, one of whom was Taliban and the other an ISAF soldier. Officially, you have to go for the most seriously injured, but I didn't do that, I just went for the ISAF soldier. That was something to keep quiet about afterwards, because otherwise I'd be held to account for it. But at that moment, I really didn't care

what the rules were; you become tough out there and it's a totally different way of life than you're used to here. When you see your mates getting shot and people getting killed around you, you start to feel differently about things (Meerbach 2009).

Military medical personnel also regularly face dilemmas about providing medicines intended for military personnel which would greatly help local civilians asking for help. We saw a poignant example of this dilemma in Chapter 2. Military ethics, which is inherently partial and puts the interests of colleagues before those of outsiders, often prevails over medical ethics, which is pre-eminently impartial. The fact that soldiers are often so loyal towards each other and towards the organisation is partly due to the fact that soldiers are so thoroughly socialised in their organisation. Soldiers are predominantly trained in-house, while professionals in other sectors (such as the medical sector) obtain most of their professional knowledge and skills outside their working environment. Conflicts of loyalty such as those described are also seen in other professionals in the armed forces, such as controllers, advisers and lawyers, but also in personnel of the Royal Netherlands Marechaussee in so far as they are charged with police tasks within the armed forces.

4. May loyalty always be expected?

The penultimate section showed that loyalty raises quite a few moral issues. We should therefore ask ourselves to what extent we may expect, or even demand, loyalty from colleagues. Should a soldier report a colleague who falls asleep during his watch, or should he keep quiet about it? To answer such questions, it is important to first address the difference between a moral dilemma and a test of your integrity. Not all difficult decisions pose a moral dilemma. As indicated in previous chapters, we speak of a moral dilemma when there is

a conflict between values; the difficulty lies in determining what the right thing to do is in such a situation. When there is a dilemma, there is no single correct decision or choice. It is often a choice between two evils, and you should consider yourself lucky if it is even clear what the least bad solution is. However, some difficult choices are more a test of your own integrity than a real dilemma. In such an integrity test it is indeed clear what the right thing to do is, but under the pressure of circumstances (e.g. peer or group pressure or self-interest) some people will make the wrong choice (Coleman 2009). Loyalty is such a circumstance. To give an example: from a medical ethics point of view, military medical personnel who have to choose between colleagues and professional principles are faced with an integrity test, not a moral dilemma. It is clear what the right thing to do is; there is, at most, external pressure to act otherwise.

Soldiers faced with a loyalty issue – should I report my colleague who has behaved incorrectly to my superior? – will often perceive this as a moral dilemma, in which loyalty and the importance of doing the right thing clash. But strictly speaking, as said before, this is a test of your integrity: taken at face value, the loyalty a person feels for his or her own group is nothing more or less than a circumstance that can persuade a person to do the wrong thing (Coleman 2009). This also means that someone who reports misconduct by a colleague is not disloyal; it is the misbehaving colleague who expects others to look the other way who is disloyal. Seen in this light, loyalty issues are nothing more than an illustration of the old adage that knowing the right thing to do is ultimately not the same as doing it. That, however, is perhaps an oversimplification: for it may underestimate the extent to which loyalty in a military organisation not only implies outside pressure, but also a value felt from within (see also Olsthoorn 2019). What if loyalty to colleagues is so important to a person that it represents a value to him or her? Many soldiers will certainly see loyalty this way. That explains at least why soldiers do perceive a dilemma. Again, an example may shed some light on the matter.

The famous West Point Honor Code states that 'A cadet will not lie, cheat, steal, or tolerate those who do'. This motto means not only that a cadet may not lie, cheat or steal, but also that he or she must report a colleague who does to a relevant authority, for example a superior. Particularly the latter element is sensitive. It suggests that denouncing colleagues, who may also be friends, is honourable, and not denouncing them dishonourable. This is at odds with the notion that, in practice, honour is traditionally associated with a great loyalty to one's own honour group. This tension manifested itself in West Point in 2013 when it appeared that some members of the rugby team would not be allowed to graduate on account of certain inappropriate emails they had sent; the rest of the team threatened to refuse to graduate as well if that were to happen. The team members put the unwritten code of honour of their own team before the Academy's official Honor Code (Anderson and McDonald 2019).

Similar mechanisms can be seen in the Netherlands. With regard to the Netherlands Defence Academy, the Central Defence Integrity Organisation wrote that 'the great value that is attached to loyalty, group formation and comradeship and the intensive formation that military personnel undergo together' can 'sow the seeds for a military practice in which there is an excessive inward focus' (2014, p. 10). The main reason given by cadets and midshipmen for an unwillingness to report incidents is 'the idea that it is not in keeping with comradeship, that it is disloyal' (2014, p. 18). Military training reinforces this, being sometimes aimed more at teaching group loyalty than at cultivating autonomous individuals (see also Jansen 2019). Military personnel usually identify mainly with the small group of colleagues with whom they spend most of their time. Interestingly, group loyalty here requires something different (i.e. not reporting) than loyalty to the organisation.

With regard to the Defence organisation as a whole, the aforementioned report on social safety within the Dutch Defence organization similarly held that loyalty to the group can reduce the willingness to report incidents (Giebels, Van

Oostrum and Van den Bos 2018, p. 65). According to the report, the organisational culture with its emphasis on loyalty is in any case an important cause of a lack of social safety: 'Loyalty is a great good and important for conducting operations, particularly during deployment. The downside of this essentially strong point of the organisation, however, is that there is a tendency to protect members of one's own group, even in the case of unacceptable behaviour, and to treat colleagues who fall outside the group unfavourably' (2018, p. 7). The fate of Hueting and Darby illustrate where this can lead to. Helicopter pilot Thompson had good reason to name 'negative peer pressure' as an explanation for My Lai (Thompson 2013). Notably, the report nevertheless mentions loyalty to the group as an element of the job profile required for working at the Defence organisation (2018, p. 65).

The committee that authored the report itself acknowledges that it is not the first to put its finger on the problem by pointing out the role of loyalty in abuses within the Defence organisation, but believes that that same loyalty is also the main reason why so little has changed after a series of reports on the subject: 'Many reports have already been written about cultural aspects in the Defence organisation. So how come that we are not able to change? Maybe it is precisely because of the loyalty of employees to their organisation and to their duty. This is both a strength and a weakness' (Giebels, Van Oostrum and Van den Bos 2018, p. 59).

5. Discussion

When soldiers talk about loyalty, they usually mean loyalty to what is closest to them; faithfulness to colleagues and faithfulness to the organisation. Loyalty to a principle has a broader scope, but plays has a smaller role within the armed forces. Although this emphasis on loyalty to colleagues in the armed forces is understandable for several reasons, it increases both the likelihood of incidents and the likelihood of those

incidents being covered up. This brings us to the question of whether armed forces should actually place so much emphasis on loyalty to the group and the organisation in education and training. Or more specifically: should they perhaps sometimes place a greater emphasis on loyalty to principles than on loyalty to the group? The report on social safety within the Dutch Defence organization, mentioned several times already, sees an important role for the education of military personnel in this field. Education is now still part of the problem, because it contributes to the strong group culture in which loyalty to colleagues plays such a major role (Giebels, Van Oostrum and Van den Bos 2018, p. 61). At the same time, education is also where the solution begins, because that is where soldiers at the start of their careers can learn that there are higher loyalties than those to the group, such as loyalty to one's own professional ethics.* As My Lai hero Hugh Thompson put it when talking about his colleagues on the ground who were killing innocent civilians: 'These were not soldiers. They were not military people' (2003, p. 18).

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* In a recent manual on military ethics, for example, we read that '(...) being a member of the military profession (...) means adhering to the ethical standards of that profession (...) rather than simply complying with the law. Thus, in any situation where law and ethics set different standards, a member of the military profession will follow the higher standard, inevitably the one required by ethics (...)' (Coleman 2013, p. 268).

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