Module outline and Case Studies

MODULE OUTLINE

MODULE: SPEAK-UP ARRANGEMENTS, CHALLENGES AND BEST-PRACTICES

Note from the authors: We hope you find this useful in your teaching. We welcome any and all comments on this document and the accompanying slides. More details are available on http://www.whistleblowingimpact.org

Module Description

This module builds upon theories in Organizational Behavior, and Business Ethics to give the student an understanding of the importance of speak-up arrangements in organizations, as well as what constitutes an effective speak-up procedure, what organizational challenges prevent employees speaking up, and what behaviours can be encouraged to support this.

Module Aim

This module aims to equip the learner with the knowledge and practical analytical skills to be an effective member of an organizational/management team by providing a comprehensive yet solidly research-grounded understanding of whistleblowing and speak up arrangements. The module focuses on critically engaging with the 'how' and 'why' questions surrounding the field and encourages students to bringing knowledge of theoretical frameworks to bear on an understanding of the contemporary world of global business.

Learning Outcomes

Through full participation in this module, students will be expected to be able to:

- Demonstrate a critical understanding and application of core perspectives that provide a framework for studying the field of whistleblowing;
- Discuss internal and external whistleblowing and where the boundary between the two blurs;
- Utilise theories of employee voice, trust, and organizational culture to explain the challenges of speaking up in organizations;

- Evaluate how firms can implement more effective speak-up arrangements.

Reading

The following texts are useful.

- Kenny, K., Vandekerckhove, W. and Fotaki, M. (2019) *The Whistleblowing Guide: Speak-Up Arrangements, Challenges, and Best Practises*. London, Wiley.
- Brown, A.J., Lewis, D., Moberly, R. and Vandekerckhove, W. (eds.) *International Handbook of Whistle-blowing Research*. Cheltenham: Edward Elgar
- Lewis, D. and Vandekerckhove, W. (eds.) *Developments in Whistleblowing Research*. London: International Whistleblowing Research Network

Lectures will be based on the above as well as additional journal articles. Additional article readings will be provided each week from high quality journals in Organizational Behaviour and Business Ethics, such as *Organization, Journal of Business Ethics and The Academy of Management Journal*. These readings are important in showing the practical application of theory to current business cases and can be drawn on for assignments.

Please note that lecture slides and textbooks are considered an insufficient source for assignment preparation. Students should read and ground their arguments on good quality, peer-reviewed research as published in journals such as:

Academic Journals

Organizational Behaviour/ Employee Voice	Business Ethics	Practitioner journals
Organization	*Journal of Business Ethics*	*Harvard Business*
Organization Studies	*Business Ethics Quarterly*	*Review*
Industrial Relations	*Journal of International*	*Academy of*
Human Resource Management	*Business Ethics*	*Management Executive /*
Human Relations		*Perspectives*
Culture and Organization		
Work, Employment & Society		
International Journal of		
Management Reviews		

Course Content

Week	Content	Readings
1	Introduction to Whistleblowing	• Miceli, M. P., J. P. Near and T. M. Dworkin: 2008, *Whistle-Blowing in Organizations* (Routledge, New York/London). • Miceli, M. P. and Near, J. P. (2002) 'What makes whistle-blowers effective? Three field studies', *Human Relations*, 55(4), pp. 455–479. • Alford, F. C.: 2001, Whistleblowers, *Broken Lives and Organizational Power* Cornell University Press, Ithaca • Kenny, K. (2019) Constructing the Whistleblower: Speaking Up in Financial Services. Harvard University Press: Cambridge, MA. • Miceli, M. P. and Near, J. P. (1992) *Blowing the Whistle: The Organizational and Legal Implications for Companies and Employees*. New York: Lexington Books.
2	Speak Up Arrangements- what we know so far	• Vandekerckhove, W. and Lewis, D. (2012) 'The content of whistleblowing procedures: a critical review of recent official guidelines', *Journal of Business Ethics*, 108(2), pp. 253-564 • Mesmer-Magnus, J. and Visesvaran, C. (2005) 'Whistleblowing in organizations: An examination of correlates of whistleblowing intentions, actions, and retaliation', *Journal of Business Ethics*, 62(3), pp. 277–297 • Vandekerckhove, W. (2006) *Whistle-blowing and Organisational Social Responsibility: A Global Assessment*. Hampshire: Ashgate
3	Internal and External Whistleblowing	• Miceli, M. P., Near, J. P. and Dworkin, T. M. (2008) *Whistleblowing in organizations*. New York: Routledge. • Detert, JR, & Burris, ER 2007, 'Leadership behaviour and employee voice: Is the door really open?', *Academy of Management Journal*, vol. 50, no. 4, pp. 869-884 • Jubb, PB (1999), 'Whistleblowing: A Restrictive Definition and Interpretation', *Journal Of Business Ethics*, 21, 1, pp. 77-94 • Vandekerckhove, W. (2010). 'European Whistleblowing Polices: Tiers or Tears?', in Lewis, D.B. (ed) *A Global Approach to Public Interest Disclosure*. Cheltenham: Edward Elgar, pp.15-35

4	Trust in Organizations	• Near, J. P. and Miceli, M. P. (1985) 'Organizational dissidence: The case of whistleblowing', *Journal of Business Ethics*, 4(1), pp. 1-16.
		• Fotaki, M. (2014), 'What market-based patient choice can't do for the NHS: The theory and evidence of how choice works in health care', Centre for Health and the Public Interest, available at: https://chpi.org.uk/wp-content/uploads/2014/03/What-market-based-patient-choice-cant-do-for-the-NHS-CHPI.pdf.
		• Möllering, G (2001), 'The nature of trust: From Georg Simmel to a theory of expectation, interpretation and suspension', *Sociology*, 35, 2, p. 403-420
		• Nooteboom, B. (1996) 'Trust, Opportunism and Governance: A Process and Control Model', *Organization Studies,* Vol 17, Issue 6, pp. 985 – 1010
		• Kenny, K. (2015) 'Constructing selves: Whistleblowing and the role of time' in *Developments in Whistleblowing Research*. Lewis, D. & Vandekerchove, W. (eds.). International Whistleblowing Research Network, Vol. 2015, p. 70-84
5	How Do People Speak Up?	• Kaptein, M (2011), 'Understanding unethical behavior by unraveling ethical culture', *Human Relations*, 64, 6, pp. 843-869
		• Kaptein, M (2011), 'From Inaction to External Whistleblowing: The Influence of the Ethical Culture of Organizations on Employee Responses to Observed Wrongdoing', *Journal Of Business Ethics*, 98, 3, p. 513-530
		• Skivenes, M, & Trygstad, S (2010), 'When whistle-blowing works: The norwegian case', *Human Relations*, 63, 7, p. 1071-1097
		• Vandekerckhove, W, & Phillips, A 2017, 'Whistleblowing as a Protracted Process: A Study of UK Whistleblower Journeys', *Journal Of Business Ethics*, p. 1-19
6	Best Practice in Speak-up Arrangements	• ACCA (2016) 'Designing and Implementing Effective Speak Up Arrangements'. Available at: https://www.wbs.ac.uk/wbs2012/assets/PDF/downloads/press/The%20Whistleblowing%20Guidelines.pdf
		• PCAW (2015) 'Whistleblowing: Best Practice Guide' Availale at: http://www.pcaw.org.uk/content/5-latest/2-news/9-pcaw-launches-new-best-practice-guide-based-on-insight-from-first-100-signatories/PCAW_Best%20Practice%20FINAL.pdf
7	Responsiveness	• Harlos, KP (2001), 'When organizational voice systems fail: more on the deaf-ear syndrome and frustration effects', *Journal Of Applied Behavioral Science*, 3, p. 324

		• Morrison, E, & Milliken, F 2000, 'Organizational silence: A barrier to change and development in a pluralistic world', *Academy Of Management Review*, 25, 4, pp. 706-725
8	Using Speak-up Data	PCAW (2015) 'Whistleblowing code of practice: Insight and experience'. Available at: http://www.pcaw.co.uk/content/5-latest/2-news/9-pcaw-launches-new-best-practice-guide-based-on-insight-from-first-100-signatories/First%20100%20Report%20-%20Insight%20and%20Experience.pdf%20FINAL.pdf
9	Implications of whistleblowing: Retaliation and Public Perceptions	Kenny, K. Fotaki, M. and Scriver, S. (2018) 'Mental Heath as a Weapon: Whistleblower Retaliation and Normative Violence'. Journal of Business Ethics. https://doi.org/10.1007/s10551-018-3868-4 Rothschild, J. and Miethe, T. D. (1999) Whistle-blower disclosures and management retaliation. Work and Occupations, 26(1):107-128. De Maria, W. (2008). Whistleblowers and organizational protesters: Crossing imaginary borders. Current Sociology, 56, 865–883.
10	Theories of whistleblowing	Kenny, K. (2018) Censored: Impossible speech and financial sector whistleblowers. Human Relations 71(8): 1025–1048. Contu, A. (2014) Rationality and Relationality in the Process of Whistleblowing: Recasting Whistleblowing Through Readings of Antigone. Journal of Management Inquiry, 23(4): 393-406. Weiskopf, R. & Tobias-Miersch, Y. (2016). Whistleblowing, parrhesia and the contestation of truth in the workplace. Organization Studies, 37(11): 1621-1640 Kenny, K. Fotaki, M. and Vandekerckhove, W. (2018) 'Whistleblower Subjectivities: Organization and Passionate Attachment.' Organization Studies, DOI: https://doi.org/10.1177/0170840618814558 Weiskopf, R. and Willmott, H. (2013) Ethics as Critical Practice: The "Pentagon Papers", Deciding Responsibly, Truth-Telling, and the Unsettling of Organizational Morality" Organization Studies, 34(4): 469-493.

The Amusement Park

Adapted from Public Concern at Work's Case Study: Involving a Regulator

(http://www.pcaw.org.uk/individual-advice/case-studies/involving-a-regulator)

Ian worked as a safety inspector at an amusement park. He was responsible for maintaining one of the park's most popular rides. Every morning he would carry out a safety inspection on the ride and, if it passed, he would sign the ride off as safe in the log. During one inspection, he noticed that pins on the axles which kept the carriages stable had become loose. Ian thought this presented a serious risk and notified his managers. After what Ian felt was not a thorough examination, the Operations Manager cleared the ride as safe. Ian was unhappy with this and the next day, as no corrective action had been taken, he again could not sign off the ride as safe. Again the Operations Manager overruled Ian and he was assigned to other rides. Ian contacted us the same day. He was anxious that the weekend was coming up and that the park would be extremely busy. He was also worried that if he pursued the issue any further he would be dismissed.

He contacted a third party advice line, and told them of his concerns. They advised that they could contact the Health and Safety Executive on his behalf and tell them of his concern, but that most likely the Health and Safety Executive would want to speak to Ian to get the information. Ian was uncomfortable talking to anyone else but asked the advice line to call them and see what they said. The advice line made contact, and the Health and Safety Executive did ask to speak to Ian, but made assurances that they would not disclose his identity to the employer if they carried out an investigation. Ian eventually talked to the Health and Safety Executive and told them of his concern, and they decided to make a 'surprise visit' to the amusement park, where they inspected several rides and ordered repairs. Ian was able to keep his job and also get the issue resolved.

Questions:

1. When did the whistleblowing take place in this scenario? When did Ian become a whistleblower?

2. What channels were used to speak-up?

3. What could have made this process go more smoothly for both Ian and the amusement park?

The Charity Shop

Adapted from Transparency International Ireland's Case study: Charity Shop Volunteers

(https://www.transparency.ie/sites/default/files/15.03.31_speak_up_final.pdf)

Background

Jim one was one of a group of volunteers who worked in a charity shop. The volunteers' job in the shop was to sort and display the donated clothes that came in as well as work the cash register during the day and interact with customers. All volunteers had a key to the shop so that they could open and close the shop, but only the shop manager, an employee of the charity, had a key to the safe. At the end of each day the volunteer on duty counted the money made, put it in a plastic bag and placed it in the safe. Once every couple of days the shop manager would take the money from the safe to the bank. A volunteer would double count the amount being deposited, and sign a form to verify that it was correct. The forms were kept in a folder in the back room and given to the main office at the end of each month.

The shop that Jim worked in was run by volunteers that had all been there a long time. They were mostly retired locals from the neighbourhood, although some students would work during their summer break for a couple months. However most of the volunteers had given up their time for free for years and took pride in making the shop as profitable as possible, winning praise for their results. The shop did well and Jim and the other volunteers enjoyed the work they did.

The Missing Money

During the month leading up to Christmas one year, the shop was doing particularly well. Jim remembered at least two days where he placed over £200 in the safe at the end of the day. He became concerned one week when he was asked to sign the deposit form by the shop manager. The previous day he had put £187 away, but the bank deposit form said that there was only £213 being sent to the bank. Jim thought that it was unlikely that the shop had only made £26 in a day, but he hadn't been working that day so he shrugged it off. About two weeks later, however, it happened again. This time the deposit form was filled out for £227 but Jim knew for a fact that he had bagged £243 for the safe the previous day. He signed the form anyway, and asked a couple of other volunteers if they had noticed anything unusual. They agreed that the deposits seemed low, so they all decided to say something to the shop manager. The manager denied that anything was amiss, but deposits continued to be low. Over the coming weeks new volunteers were recruited and trained, and then one day Jim went to open the store only to find that the locks had been changed. When the shop manager arrived, he handed Jim a card that thanked him for his time and service, but told him that they no longer

needed him at the shop. Jim was outraged and distraught; he had no idea that volunteers could be dismissed!

Questions:

1. What speak up arrangements did the charity have in place, either formal or informal? What was missing?
2. What are Jim's options if he wants to continue speaking up?
3. How could the charity as an organization ensure that Jim's concern is heard?

Week 3: Internal and External Whistleblowing

The Pharmacist

Adapted from Public Concern at Work's Case Sudy: Witness Dismissed

(http://www.pcaw.org.uk/individual-advice/case-studies/witness-dismissed)

JB was one of several pharmacists at a chemist in a small town. Her boss owned the shop and was himself a pharmacist. Part of his work was to claim rebates from the NHS for the drugs prescribed. Occasionally the NHS would ring to check one of prescriptions and when her boss was not there, JB would answer. More often than not she would realise that some error had crept into the paperwork, that favoured the pharmacy. She would put this right and then politely point it out to her boss. The errors kept on being made and whenever the NHS asked JB she would deal with it honestly and fairly. One day when the boss was away two NHS investigators called into the shop and asked to meet JB to go through some of the rebates claimed. She agreed to meet them and told her boss. After the interview, at the request of the investigators, JB made a formal statement. Again she told her boss what was happening. Some weeks later he was arrested and charged with fraud. The next day she received a letter from his solicitors dismissing her. They claimed that if she continued to work there, her boss could also be charged with interfering with a witness. While JB was able to file a claim under PIDA to get proper compensation, and was soon able to secure a new job, she couldn't help but wonder why she was being punished for someone else's mistake. She complained about this to her friend over lunch one day, and her friend replied, "JB, don't you know, whisteblowers are always the ones who suffer in the end!"

JB was taken aback, was she a whistleblower?

Questions:

1. Is JB a whistleblower? Explain why you think she is or is not.
2. Did JB speak-up internally or externally?
3. If JB had gone to her boss with a concern about fraud, and she was ignored, and then went to the NHS to speak-up, how would that change the scenario, both for JB and her boss?

The Expense Report

Case Study Written by Meghan Van Portfliet

Background:

Sally was a Senior Manager in a telecoms company. She had been in the company for many years and was in charge of overseeing 20 staff. She was considered knowledgeable and likeable by her staff, and she often took the team to lunch and other social outings. She had always operated an "open door policy" and she encouraged her team to come to her with any issues they had. She tried to make time each week to meet with her staff one-to-one and see what they needed her help with. While no-one ever dropped in to relate concerns, and the one-to-one meetings were mostly a formality, Sally felt that she had a good team with open communication.

The Meeting:

One day, during one of her one-to-one meetings, Sally learned of some troubling news. John, one of her sales analysts, had been asked by his manager, Shaun, to enter in some expenses that Shaun had "forgotten" to put through. As Shaun was John's manager, Shaun could just approve the expenses and there would be no fuss, but the "proper" procedure would be to have Shaun contact HR and ask for an extension so he could submit the late expenses. John told Sally that he was worried: that he didn't want to become a fall back plan for when Shaun didn't get to his responsibilities on time. Sally assured Shaun that she would talk to John, and she would do it in a way that didn't implicate John. John thanked her and left the office. Sally wondered how something so small could upset John so much, but made a mental note to talk to Shaun when she saw him. In the coming weeks, Sally saw Shaun a couple times, but it never seemed to be quite the right time to mention the incident.

A couple weeks passed, and John came back in for his one-to-one meeting. He seemed nervous, but Sally didn't want to pry. She asked if everything was ok, and John said yes, and the meeting ended early. Three days later Shaun informed Sally that John had given his notice, that he had apparently found a job in another company. Sally couldn't help but wonder if it had something to do with the conversation she had had with John about the expense report. She asked HR to see her department's expenses for the last month. She found a report filed by John and approved by Shaun for some expenses that were a couple of months old. Sally couldn't help but be disappointed that she had lost a good employee over something so small.

Questions:

1. What kind of trust was John exhibiting in going to Sally with the information on the expense report?
2. What was the role of time in this scenario?
3. What could Sally have done that would have possibly solved the issue in a way that was satisfactory to John, but not detrimental to Shaun?

Week 5: How Do People Speak Up

The Brewery

Case study written by Meghan Van Portfliet

Background:

A large brewery in the US is situated on the edge of a river, in a rural area at the foot of the mountains. Downstream is a small town, and some farmland, and several miles further downstream there is a major metropolitan city with over 1 million residents. The brewery started out as a family business in the 1800s but has grown into an international brand with several satellite breweries around the world. The original site is still in operation, however, and employs around 300 people, even though the brewing process is increasingly more automated. It is a friendly working environment, and several of the employees live in the small town just downstream. The company has stated values of sustainability and environmental friendliness and has always worked with the community of residents and farmers to make sure that the brewery is benefitting everyone. The CEO has his office in the brewery, and is frequently on site saying hello to the employees and asking about their work. He reminds them that he has an "open door policy" and to "come and see him if they ever need anything". Most employees agree that it is a great place to work and turnover is very low.

Sam's Dilemma:

Sam was one of the operations managers in the brewery, and he had been there for over 10 years. He liked his job, his manager and the values of the company; he was very proud to be an employee of the brewery. As part of his job Sam was required to review the disposal process for the "mash" or the mixture of grains and water that was fermented to make the beer. The company had recently changed the process so the grain could be sent to the local farmers as feed for the livestock. Sam noticed soon after the change however that something was not right. The process of cleaning the grain of the yeast used filtered river water that was then filtered again and sent back to the river to flow downstream. Sam was not confident in the filtration process that was being used; he was concerned that it was not cleaning the grain well enough and also polluting the river water. If this was allowed to continue, it could be detrimental to the livestock and potentially harmful to the residents downstream.

Sam didn't know of any formal process in the brewery to report such issues, but he knew he needed to tell someone; the problem was just too big to let slide. He decided he would raise the issue immediately in the hope that the company would do the right thing.

Questions:

1. What organizational virtues from Kaptein's CEV model are evident in the case?
2. Based on these virtues, how do you think Sam will speak up?

Week 6: Best Practice in Speak Up Arrangements

The Best Policy
Case Study Written by Meghan Van Portfliet

James is an HR manager at a well-established steel manufacturing company. Part of his job is to make sure that policies and procedures are updated regularly to ensure that they accurately reflect the "real world of work" and that they incorporate the changes in the business that are always taking place. Recently, a law was passed that gave whistleblowers strong protections. When James read about it in the newspaper, he started to wonder whether his company had a whistleblowing policy in place. He decided to check that day when he got to work. He discovered that they didn't, and the grievance procedure was over 7 years old! He went to his boss with the information and asked if he could put together a committee to update the grievance policy and write a new whistleblowing policy. James' boss was very supportive and said he would bring it up at the department meeting the following week so that a committee could be assembled.

The next week, James was pleased to find out that he was appointed head of a committee to make the changes he had requested. He had four other HR colleagues on the committee with him, all experienced HR professionals. They met for an introductory session to brainstorm how the policies should look. Shane, the manager with the most tenure, recommended that the grievance and whistleblowing procedure be combined. "They are both instances of complaints really, and we want to have 'one stop' where people can go with any complaint, or else they will get confused", he said. Melanie, a manager that had just been hired from a consulting firm, had a different idea. "I think that they should be separate, that complaints should come to us, but whistleblowing issues should go to the manager", she said. Charlie, a manager on James' team chimed in, "No, we want them to go to someone above their manager, someone that really has power to do something". Amy, a manager that had been there for just over 4 year added, "I think that if it's whistleblowing, they should be talking to someone really independent, someone outside the organization".

James and the committee debated, but each was convinced that their approach was the right approach. James had a gut feeling that they were all right in a way, how was he supposed to pick which approach to take?

Questions:

1. Whose approach is best and why?
2. Are there any options that have not been considered?
3. How can the committee be sure that they approach they take reflects best practice?

Week 7: Barriers to Responsiveness

The Hospital

Case study written by Meghan Van Portfliet

The Nurse:

Julio is a nurse in a busy hospital in a big city. Like most nurses, he works long shifts, and is on his feet and on the move for the duration of his shift. He sees many patients and works with many doctors during any period, and lately he has noticed that not everyone is using the hand sanitizer when they enter and exit a ward like they are supposed to. Not just nurses, but doctors as well. Julio doesn't feel like it is his place to monitor his co-workers, but he knows that there have been at least two patients that have had infections after being treated, which is the precise reason that the hand sanitizer is there and the policy requires them to use it. Because a lot of people are involved, and not just one person, Julio decides to make an anonymous report to the hotline that is set up for whistleblowing. He calls from a payphone on his way home one night, just to make sure that he isn't identified. He gives the person on the hotline his information and heads home. In the coming weeks, Julio keeps an eye out to see if people start to use the sanitizer more. He doesn't notice any change. He decides to write a letter to the management, which he mails to them with no return address. In the letter he expresses disappointment that nothing has been done and reiterates the issues that can be caused from having unhygienic workplaces. Again, he keeps an eye out but still there is no change. Julio starts to wonder why the management even has a hotline or a whistleblowing process if they aren't even going to do anything about it.

The Manager:

Meg is a manager in the hospital where Julio is a nurse. Her job is to make sure the ward runs smoothly and try to make cost and efficiency savings wherever she can. One day she was made aware that the whistleblowing hotline had a complaint about people not using hand sanitizer when they entered or exited one of the wards. She decided to check it out, and arranged to shadow one of the doctors that worked in that ward, which was not an unusual thing for Meg to do in the course of her job. She shadowed the doctor and paid attention to other people around, seeing if they used hand sanitizer. She saw for the most part that they did, although she noticed one doctor that did not. Meg made arrangements to have a colleague shadow that particular doctor and discovered that the doctor

never used the hand sanitizer. Meg drew up the papers documenting the issue, had a conversation with the doctor and laid out the consequences if the behavior didn't change. Not long after this, however, Meg got a letter in the post complaining of the exact same thing. The letter was also anonymous, so she didn't know if it was the same complainant or not, but she was concerned that it had been raised again. She decided to investigate more and found that people were in fact using the sanitizer. She thought maybe the issue was that there were lots of stations for people to use, and so maybe the problem was just one particular station wasn't being used as much, but she had no one to contact to get more information, and no way to communicate that one doctor had been disciplined due to privacy regulation. Meg wondered how she could show that she was taking the complaint seriously when she had no idea who to report back to!

Questions:

1. What barriers does Meg face in responding to Julio?
2. What are some things that Meg could do so that Julio would know his complaint was being addressed?
3. What could Julio do to make it easier for Meg to communicate, while still remaining anonymous?

Week 8: How to Use Speak Up Data

The Investor

Case Study written by Meghan Van Portfliet

Joel is an investor that is looking to diversify his portfolio. He decided that he wanted to invest in a medium-size company that was well-established, to lower the risk of his investment. He read about a digital media company that had had some internal trouble with accounting, but had a new mobile app product that was very promising. Before deciding whether to invest, he decided to meet with the board and the CEO to get a feel for how the business was run.

Joel went to the meeting and listened to the presentations about the history of the company, the products and the vision for the future. He found it all very interesting but he was concerned that there was no mention of the internal issues that the company had recently had. He asked the CEO about it but was given a vague answer. He was obviously making everyone uncomfortable.

"Listen, I am not trying to run you through the ringer, I just would like to know what happened," Joel pressed. The CEO sighed and explained that they had one employee in the finance department that was purposely padding accounts to increase the amount of his bonus. "He was one bad egg in a really good bunch, though. It was actually someone internally that reported the fraud, we take great pride in the fact that our employees can come to us with concerns like this", the CEO said. He explained that it

was a very good culture, that people were open and trusting, that they did employee satisfaction surveys every year to see what they could improve upon. Joel was glad to hear this, but was still a bit worried that maybe the correct procedures were not in place. "Do you have any statistics on how many reports of bad behavior you get each year?" he asked. The CEO shifted in his chair and said no, they didn't really track things like that, but maybe they should.

Joel thanked everyone for their time and left the meeting. He was really interested in the company, but was still a bit unsure about the culture there. Was this the first time the fraud was reported? And if so how did it get so bad before it was taken care of? He really wished he had more information, but since it was unavailable, he would have to make up his mind without it.

Questions:

1. What information could the CEO provide to Joel that would make him more confident in the company?
2. How could the company document its speak-ups in a way that would be useful in this situation?
3. What other uses could the company have for the speak-up information if they had it documented?