



WHISTLEBLOWING PROCESSES & PROCEDURES – AN AUSTRALIAN & NEW ZEALAND SNAPSHOT

**Preliminary Results: *Whistling While They Work 2*
Survey of Organisational Processes & Procedures 2016**

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Whistling While They Work 2: Improving managerial responses to whistleblowing in the public and private sectors*

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- 7 Victorian Independent Broad-based Anticorruption Commission
- 8 Victorian Ombudsman
- 9 Queensland Ombudsman
- 10 South Australian Ombudsman
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- 12 NT Commissioner for Public Interest Disclosures
- 13 Australian Securities & Investments Commission
- 14 New Zealand State Services Commission
- 15 New Zealand Ombudsman
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- 17 Telecommunications Industry Ombudsman
- 18 South Australia Independent Commissioner Against Corruption
- 19 Tasmanian Ombudsman
- 20 Tasmanian Integrity Commission
- 21 Transparency International Australia
- 22 Governance Institute of Australia
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Summary

Organisational processes and procedures for the reporting of wrongdoing are widely recognised as vital to good governance – both for organisations themselves and to fulfil wider purposes of integrity, regulatory compliance and social responsibility.

This report presents a snapshot of the whistleblowing processes and procedures of **702 public sector, business and not-for-profit organisations** from Australia and New Zealand, collected between April and August 2016 via the online *Survey of Organisational Processes and Procedures* – the first stage of the research project *Whistling While They Work 2: Improving managerial responses to whistleblowing in public and private sector organisations*.

Whistling While They Work 2 is led by Griffith University, with a research team including the Australian National University, University of Sydney and Victoria University of Wellington, and supported by the Australian Research Council and by 23 partner and supporter organisations including the Australian Securities and Investments Commission, CPA Australia and leading public integrity agencies in all Australian and New Zealand jurisdictions, as detailed in the front cover of the report.

The snapshot is the largest cross-section of organisations to participate in a single survey to date, worldwide, and the first survey to systematically compare self-reported evidence from organisations on whistleblowing processes across the public, business and not-for-profit sectors alike. The results assist evaluation of whistleblowing processes by organisations; and highlight key areas for policy and law reform.

While the results help document and compare the important efforts that many organisations are placing on processes for encouraging employees to report wrongdoing, they also point to common areas of weakness or challenge.

Evidence of the **strong efforts** of many organisations include:

- 89% of respondent organisations indicated they had *formal, written whistleblowing procedures or policies*;
- 90% of organisations indicated they have processes for ensuring *appropriate investigations or management actions in response to wrongdoing concerns*;
- 76% of organisations, including 79% of private sector businesses, responded that they accepted *anonymous* wrongdoing concerns – i.e. acted ‘without requiring staff members to identify themselves’.

Upwards of 87% of private sector organisations, and 90% of public sector organisations, said their reporting procedures extend across a **broad spectrum** of reporting, including fraud, corruption, abuse or mistreatment of customers, and health, safety and environmental dangers.

These results have implications for law reform – indicating that most businesses encourage reporting across a wide range of concerns, not simply industry- or organisation-specific concerns, and would be best supported by a comprehensive approach to whistleblower protection as currently occurs in the public sector.

Key results indicating the extent to which the survey also captured organisations with less comprehensive processes, or the extent of gaps in current processes, include:

- 26% of businesses and 36% of not-for-profit organisations (23% of all respondent organisations) had *no particular system for recording and tracking wrongdoing concerns*, either at all or unless/until they arise;
- 33% of businesses and not-for-profit organisations (23% of all organisations) *did not currently have any strategy, program or process* for supporting and protecting staff who raise concerns;
- 49% of businesses and 51% of not-for-profit organisations (38% of all organisations) indicated they *did not assess the risks of detrimental impacts* that staff might experience from raising wrongdoing concerns, either at all or until problems began to arise.

While only 4% of organisations (including 9% of not for profits) indicated that they provided no **types of support** for staff who raise wrongdoing concerns, specific support relating to reporting is most often limited or reactive:

- Less than a third of organisations (31%) provide formal acknowledgement of service such as *thanks or congratulations* where appropriate (only 27% of business and 28% of not-for-profits);
- Less than half of organisations (46%) provide access to a *management-designated support person inside the organisation*, in advance or irrespective of any problems arising (only 39% of private business and 32% of not-for-profits);
- Only two thirds of organisations (67%) provide *management intervention in workplace problems, if required*; with this falling to only 60% of not-for-profits and 51% of private business.

If staff experience reprisals, conflicts, stress or other detrimental impacts for reporting:

- Fifteen percent of organisations, including 19% of private business and 24% of not-for-profits, have *no particular processes* for seeking a resolution to any problems that could arise; and
- Only 16% of organisations reported having *mechanisms for ensuring adequate compensation or restitution* for the whistleblower – including 17% of business, 17% of public sector organisations, and 13% of not-for-profits (Q23a).

This means that more than 80% of organisations have no such mechanisms, including not only 89% of small organisations, but 77% of large organisations.

Many results indicate that even when trying hard to encourage their staff to report any wrongdoing concerns, too many organisations lack the specific guidance and incentives they need to realise their own goals of actual protection.

While some apparent weaknesses may be addressed by clearer identification of successful practice and improvements in guidance, other gaps, such as the lack of processes for seeking adequate resolutions in cases of detrimental impact, may require a combination of stronger management commitment and regulatory reform.

Results point to a need for further reform and stronger oversight in the public sector, and especially confirm that for the private and not-for-profit sectors, a well-informed legislative overhaul is overdue.

The next stage of the research includes a more in-depth phase, **Integrity@WERQ**, in which many of the respondent organisations are participating in a further, comprehensive evaluation of their processes including a major survey of their managers and employees (the *Workplace Experiences & Relationships Questionnaire*, or WERQ).

1. Introduction

Organisational processes and procedures for the reporting of wrongdoing by insiders, such as staff, contractors and volunteers, are now widely recognised as vital to good governance – both for organisations themselves and to fulfil wider purposes of integrity, regulatory compliance and social responsibility.

This reports presents a snapshot of the whistleblowing processes and procedures of **702 public sector, business and not-for-profit organisations** from Australia and New Zealand, collected between April and August 2016 via an online **Survey of Organisational Processes and Procedures** (see Appendix for questionnaire), as the first stage of the research project *Whistling While They Work 2: Improving managerial responses to whistleblowing in public and private sector organisations*.

About the project

Whistling While They Work 2 is led by Griffith University, with a research team with members from the Australian National University, University of Sydney and Victoria University of Wellington, along with partner investigators. The project is supported by the Australian Research Council through Linkage Project 150100386, and by 23 partner and supporter organisations including the Australian Securities and Investments Commission, CPA Australia and leading public integrity agencies in all Australian and New Zealand jurisdictions, as detailed in the front cover of the report.

WWTW2 builds on its predecessor ARC Linkage Project, *Whistling While They Work: Enhancing the theory and practice of internal witness management in public sector organisations*, by extending systematic research into organisational responses to whistleblowing across all sectors. The project aims to identify the factors that influence good and bad responses to whistleblowing across a wide range of institutions, provide a clearer basis for evaluation and improvement in organisational procedures, and inform public policy and the reform or introduction of whistleblower protection laws.

The initial **Survey of Organisational Processes and Procedures** reported below was the first stage of the project. As well as providing broad understanding of the state of whistleblowing processes across all sectors, the survey allowed participating organisations to nominate their interest in the next phase of the research: **Integrity@WERQ**.

In this next phase, comprehensive evidence of the performance of these processes is being gathered in a large number of the respondent organisations, via the further 25 minute **Workplace Experiences & Relationships Questionnaire (WERQ)**. This involves surveying all/most managers and employees along with further assessment of the processes and procedures in this report. For most participating organisations, **Integrity@WERQ** also provides an opportunity for specific benchmarking and evaluation of current whistleblowing processes and their performance, in each organisation.

The research is occurring in the **wider context** of significant policy development in Australia and New Zealand, where comparatively advanced whistleblowing regimes have been legislated for most public sectors, but questions remain about implementation and effectiveness in practice, given the challenges involved.

Further, only highly limited whistleblowing legislation applies in, or guidance is available for, the vast bulk of the private and not-for-profit sectors of Australia and New Zealand.

As a result, for example, the Australian Government's draft first national action plan under the Open Government Partnership proposes a national consultation on 'reform options to strengthen and harmonise whistleblower protections in the corporate sector with those in the public sector', in recognition that '**overly narrow**' protections for private and not-for-profit sector employees currently make it '**unnecessarily difficult** for those with [public interest] information to qualify for protections' (Commonwealth of Australia 2016, p.11). The significance of *Whistling While They Work 2* for this process has also been noted.

Standards Australia has also announced its plan to review the relevant Australian Standard for Whistleblower Protection Programs for all organisations/entities (currently AS8004: Standards Australia International 2003).

The results below are thus intended to assist the roll-out of the main *Integrity@WERQ* research, and more comprehensive evaluation of whistleblowing processes by organisations; and to highlight key areas for attention in policy and law reform.

About the survey

The questionnaire (Appendix) for the survey was developed in early 2016, in consultation with the partner and supporter organisations listed in the cover of the report. These include regulatory and integrity agencies and professional bodies covering all aspects of corporate and organisational governance in the participating jurisdictions.

Structure and content of the survey were informed by a large number of previous official and expert reviews. A major starting point was the elements of public sector good practice identified by *Whistling While They Work 1* (Roberts *et al* 2011), since taken up in procedural guidance and evaluation by a wide range of jurisdictions, including the Commonwealth Ombudsman, New South Wales Ombudsman, Queensland Ombudsman, Western Australia Public Service Commissioner and as far afield as Alberta (2013).

However other Australian and international resources were used to extend the survey to probe for different processes (and not simply formal procedures) across the private and not-for-profit sectors, in an effective comparative way. Some of these key resources are listed in Section 6 (Bibliography). The scale and level of detail of processes identified as important by previous reviews differs widely: for example, from the 93 items suggested by Hassink, de Vries and Bollen (2007), to the 44 items identified by Roberts *et al* (2011), to the eight key items nominated by Lewis (2002). Despite being only a first-stage survey designed for quick completion, the questionnaire was developed in light of key common themes across all these approaches.

A particular finding of previous research was that the 'administrative' areas of whistleblowing processes – e.g. advice on what can be reported, to whom and how it will be investigated – were considerably stronger than processes for delivering on commitments to employee support and protection (Roberts 2008 p.259; Brown & Olsen 2008). More than previous approaches, the survey was also designed to test in more detail for support and protection processes.

Respondent organisations were recruited through direct approach by the partner organisations to the project, in April-May 2016, to every public sector agency at all levels in both countries; and to the vast majority of businesses and not-for-profit organisations, including all of Australia's 31,000 public unlisted and large proprietary companies. Public sector agencies were also sent a reminder, contributing to their strong representation in the results. Recruitment was supported by significant media attention. The survey was open from 26 April 2016 until 31 August 2016.

2. Overview of respondent organisations

Table 1: Respondent organisations by sector & size

| | Public Public sector or government entity | Private Company or business (for profit) | Not-for-profit | Total |
|---|--|---|--------------------------------------|-------------------------------------|
| Small (11-100 employees) | 83 | 51 | 57 | 191 |
| | 19.0% | 34.0% | 49.6% | 27.2% |
| | 43.4% | 26.7% | 29.8% | 100% |
| Medium (101-1000 employees) | 229 | 51 | 44 | 324 |
| | 52.4% | 34.0% | 38.3% | 46.2% |
| | 70.6% | 15.7% | 13.5% | 100% |
| Large (More than 1000 employees) | 125 | 48 | 14 | 187 |
| | 28.6% | 32.0% | 12.2% | 26.6% |
| | 66.8% | 25.6% | 7.4% | 100% |
| Total | 437 100.0% 62.3% | 150 100.0% 21.4% | 115 100.0% 16.4% | 702 100.0% 100% |

Table 2: Position of organisational representative responding to survey

| | Public | Private | Not For Profit | Total |
|--|--------------------|--------------------|--------------------|--------------------|
| Chief Executive Officer | 50 | 13 | 24 | 87 |
| | 11% | 9% | 21% | 12% |
| Chief Operating Officer / Executive officer / Office manager / Finance | 22 | 12 | 18 | 52 |
| | 5% | 8% | 16% | 7% |
| Corporate affairs/services | 59 | 3 | 9 | 71 |
| | 14% | 2% | 8% | 10% |
| Internal audit / Ethical standards / Disclosure coordinator | 96 | 12 | 1 | 109 |
| | 22% | 8% | 1% | 16% |
| Human resources | 82 | 19 | 19 | 120 |
| | 19% | 13% | 17% | 17% |
| Governance / Risk / Assurance | 77 | 20 | 7 | 104 |
| | 18% | 13% | 6% | 15% |
| Compliance/regulatory affairs | 18 | 31 | 9 | 58 |
| | 4% | 21% | 8% | 8% |
| Corporate counsel / Legal / Company secretary | 29 | 38 | 23 | 90 |
| | 7% | 25% | 20% | 13% |
| Other (Board, Business owner, Admin officer) | 4 | 2 | 5 | 11 |
| | 1% | 1% | 4% | 2% |
| Total | 437 100% | 150 100% | 115 100% | 702 100% |

Responses were received from a total of 721 organisations. This report details responses from **702 organisations**, excluding organisations indicating they had no operations in either Australia or New Zealand, and organisations with less than 10 employees.

Table 1 details the sectors and sizes of the organisations.

Table 2 details the positions or work areas of the persons who completed the survey on behalf of their organisation. As detailed in the questionnaire (Appendix), organisations and individual respondents were instructed that the survey should only be completed by a senior manager with authority to do so on behalf of the organisation, as well as knowledge of the organisation's processes and procedures.

Tables 3 and 4 detail the diversity of the organisations, for all public and non-government organisations respectively. Public sector organisations are detailed by jurisdiction / level of government. Non-government organisations are detailed by industry sector.

As frequently occurs with field surveys, this final sample of organisations is self-selecting rather than randomly selected. This limitation needs to be taken into account before interpreting any result as necessarily representative, particularly for the private and not for profit sectors.

Further, while the opportunity to participate in the survey was extensive, the combination of self-selection and self-reported responses means results may well be skewed – either:

- Positively, e.g. because organisations are confident in their processes, or
- Negatively, e.g. because organisations have elected to participate because they know they lack processes or have less confidence in them, or
- Both.

These factors need to be borne in mind when interpreting the results. To the extent that they represent limitations on the data, these limits will be addressed as further analysis proceeds, and the larger project is completed, especially through the collection of additional organizational data, and data on the experiences of individual managers and employees in many of the respondent organisations.

As discussed below, however, these results confirm the survey was completed by a very wide cross section of organisations in Australia and New Zealand – not only an unprecedented number of organisations, but an unprecedented range in terms of sizes (small to large), industries, public sector functions and not-for-profit activities.

Table 3: Public sector / government entities by jurisdiction

| Level | Jurisdiction | | | | | | | | | | Total |
|----------|-----------------|-------------|----------|-----------------|-------------------|----------|------------------------|--------------------|------|-------------|-------|
| | Australia | | | | | | | | | New Zealand | |
| | New South Wales | Queens-land | Victoria | South Australia | Western Australia | Tasmania | Aust Capital Territory | Northern Territory | Subt | | |
| National | 26 | | | | | | | | 26 | 47 | 73 |
| State | 50 | 33 | 33 | 13 | 41 | 12 | 7 | 9 | 198 | | 198 |
| Local | 36 | 21 | 25 | 34 | 20 | 8 | NA | 3 | 147 | 19 | 166 |
| Subt | 86 | 54 | 58 | 47 | 61 | 20 | 7 | 12 | 345 | | |
| Total | | | | | | | | | 371 | 66 | 437 |

Table 4: Private and not-for-profit organisations by industry*

| | Health care and social assistance | Financial and insurance services | Manufacturing, wholesale, retail trade | Agriculture, forestry, fishing, mining, construct | Arts, recreation, accomm, food, hospitality | Professional, technical, admin, real estate, info, media services | Education, training | Electric, gas, water, waste services | Transport, postal, warehousing. | Total |
|----------------------------------|-----------------------------------|----------------------------------|--|---|---|---|---------------------|--------------------------------------|---------------------------------|-------------|
| Company or business (for profit) | 7 5% | 54 36% | 35 23% | 19 13% | 6 4% | 13 9% | 2 1% | 9 6% | 5 3% | 150 100% |
| Not-for-profit | 66 57% | 7 6% | 0 0% | 3 3% | 16 14% | 8 7% | 15 13% | 0 0% | 0 0% | 115 100% |
| Total | 73 28% | 61 23% | 35 13% | 22 8% | 22 8% | 21 8% | 17 6% | 9 3% | 5 2% | 265 100% |

*NB: Including 2 New Zealand private and not-for-profit organisations (1 company/business, 1 not-for-profit); remainder are Australian.

3. Key findings

Value of the snapshot

The full results of the survey, set out by reference to each question (Q9-Q18) in section 4, support a range of important preliminary findings.

As discussed above, while there are limits to interpretations of representativeness, the survey is the first to systematically compare the reported features of whistleblowing processes across all three sectors (public, private and not-for-profit) and the largest cross-section of organisations known to date to have participated in a single survey of this kind.

The survey has especially fulfilled its aim of providing a clearer basis for the design of the next, main phase of the research (Integrity@WERQ), given its objective of assessing organisational responsiveness to whistleblowing in a more comprehensive manner, across a full spectrum of organisation types and sectors. This includes greater assurance that subsequent research instruments – especially the Workplace Experiences & Relationships Questionnaire (WERQ) – are well-tailored to this wide diversity of organisational types, sizes and contexts.

Irrespective of any aggregate positive or negative skew, the major aim was also achieved of capturing a wide range of organisational processes – including less comprehensive along with more comprehensive processes. For example:

- While most organisations reported having **formal, written procedures or policies** setting out their reporting processes (Q24), 10.7% of organisations **did not**, especially not-for-profit (28.7%) and other smaller organisations (26.2%);
- 22.5% of organisations (especially not-for-profit, 35.6%, and private business, 26.0%) reported that they had **no particular system for recording and tracking wrongdoing concerns**, either at all or unless/until they arise (Q15 c/d); and
- 22.8% of organisations (especially not-for-profit, 33.9%, and private business, 32.7%) currently had **no specific support strategy, program or process** for delivering support and protection to staff who raise wrongdoing concerns (Q21 c).

These and other results confirm the survey successfully captured not only a wide cross-section of organisations, but organisations with a wide range of experiences with respect to the presence or absence of different whistleblowing processes.

While the results help document and compare the important efforts that many organisations are placing on processes for encouraging employees to report wrongdoing, they also point to common areas of weakness or challenge, to form the focus of the next stage of research as well as law reform.

Strong efforts

The vast bulk of organisations who responded to the survey reported a wide range of processes for encouraging and responding to wrongdoing concerns from staff. As already indicated, 89.3% of all organisations indicated they had **formal, written whistleblowing procedures or policies** setting out these processes.

There was nevertheless significant variation, with 95.2% of public sector organisations indicating written policies or procedures, and 86.0% of private businesses, but only 71.3%

of not-for-profit organisations (Q24). Not-for-profit organisations were twice as likely as businesses *not* to have written procedures; with businesses themselves three times as likely as public sector organisations, not to have procedures.

Among processes for responding to wrongdoing concerns, 90% of organisations reported they had processes for **ensuring appropriate investigations or management actions** were undertaken (Q16 c). This result again varied between public sector organisations (93.4%), and business and not-for-profit organisations (84.7% and 84.3% respectively).

Almost a tenth (9.6%) of not-for-profits, 6.0% of businesses and 1.6% of public sector organisations admitted to having **no processes whatsoever** for responding to wrongdoing concerns (Q16 g) – underscoring the diversity of the responses.

When it came to the **types of wrongdoing** about which organisations encouraged or required their staff to report their concerns (Q10), there was higher than expected similarity between the public and private sectors with regard to both:

- the **nature** of the wrongdoing types, and
- the **range** of wrongdoing types with which processes were concerned.

Between 86.7% and 97.3% of private business identified six of the major categories of wrongdoing offered by the survey, as ones that ‘staff can or should report’. These categories included fraud or theft; corruption; abuse or mistreatment of clients, customers or the public; and dangers to public health, safety and or the environment (Q10).

This result corresponds strongly with public sector organisations, between 89.9% and 99.1% of which identified the same categories. Not-for-profit organisations identified these categories as relevant in between 72.2% and 88.6% of cases.

The greatest difference was the extent to which organisations identified ‘waste or mismanagement of resources’ as something staff could or should report (83.5% of public organisations, but only 62.7% of private organisations and 55.7% of not-for-profits: Q10 d). ‘Defective, negligent or improper decisions’ were a somewhat more uniform if lesser focus of all processes (79.2% public, 72.0% private, 60% not-for-profit: Q10 e).

These results have implications for **law reform** – in particular, whether new whistleblowing requirements are legislated comprehensively, for staff reporting across a wide spectrum of wrongdoing concerns, or separately in different areas of regulation. The results indicate most businesses encourage reporting across a wide range of concerns, not simply industry- or organisation-specific concerns, and would be best supported by a comprehensive approach, as currently occurs in the public sector.

The bulk of organisations (82.9%) indicated they had different processes in place for responding to wider wrongdoing concerns such as fraud, theft, corruption, negligence or dangers to public health or safety, from their normal processes for responding to **workplace grievances** (Q9).

However, 14.2% of all organisations either only had workplace grievance processes or used those processes to respond to all wrongdoing concerns – rising to 24.6% of private business and 33.9% of not-for-profits (Q9, a&b). Further, 17% of all organisations indicated that although they had different processes, their workplace grievance processes were more comprehensive than their wider wrongdoing processes (Q28a).

This suggests that, in fact, 31.2% of all organisations, including 37.3% of private business and 56.5% of not-for-profits, are either relying only on their normal grievance processes to manage whistleblowing, or in their own view may be relying on comparatively weak processes.

As is already clear, wrongdoing processes were generally least comprehensive among **not-for-profit organisations**, and most comprehensive among **public organisations**, with private business falling in between.

However, it is important to note that in almost all Australian jurisdictions, all public agencies are now subject to specific legislative requirements for public interest disclosure procedures – unlike other sectors. To that extent, there remain questions why results for public agencies are not higher, with many results still indicating significant relative shortcomings in implementation of these requirements.

It is also important to note that **small size** (100 or fewer employees) is frequently the main predictor of less comprehensive processes.

While 43.4% of the 191 small organisations in the study are from the public sector, 29.8% of them are from the not-for-profit sector, as against 26.7% coming from the private sector (Table 1). Most importantly, half (49.6%) of all not-for-profit organisations in the study are small, compared with a fifth of public organisations and a third of private business.

Consequently, it is clear that many of the comparatively poorer results in the non-for-profit sector relate to the capacity challenges associated with small size. At the same time, size is clearly not always the only factor.

Training and awareness

While the vast majority of organisations had reporting processes in place, the results confirm that the extent and degree to which these are embedded in organisational practice is a different and often open question.

Almost all (98.1%) of organisations use one or more **conventional, formal mechanisms for making staff aware** of their reporting processes, such as information at induction, their code of conduct, or access to published procedures (Q25 a-d).

Position descriptions or employment contracts (Q25 e) are also used according to 37.2% of organisations, especially not-for-profit organisations (42.6%) – perhaps reflecting the prominence of mandatory reporting procedures (e.g. child protection) in these contexts.

By comparison, far fewer organisations reinforce these processes through **direct communication** between management and staff (Q25 j, h, i, k). The least frequently used mechanisms were advice from each manager to their own staff (28.1% of organisations) and individual personal communication by the CEO with their staff (20.8%), with private business the weakest in each case (20.0% and 18.7% respectively).

Less than two-thirds of organisations make staff aware of their reporting processes through **general training** (61.7%), and only half through any **specific training** (48.6%) (Q25 f/g).

The limited use of **specialised training** especially varies by sector and size. Seventeen per cent of organisations responded that they give *all staff* specialised training (Q26 a), highest among private businesses (22.7%) and medium-sized organisations (21.9%).

The most likely to receive training are select specialist staff, who receive it in 52.0% of all organisations, but mostly in the public sector (62.0%) rather than the private (36.7%) or not-for-profit sectors (33.9%: Q26 d).

In all, 24.4% of organisations responded that **no staff** currently receive any specialised training, especially in the not-for-profit (35.7%) and private (32.7%) sectors, compared with the public sector (18.5%: Q26 e). This result further highlights the challenge of

actually implementing good processes, given the known difficulties and complexities of dealing effectively with whistleblowing concerns. It is unclear how these organisations can be confident in their ability to fulfil the commitments in their policies.

Two-thirds of all organisations (65.5%) reported providing all staff with **advice on their rights and responsibilities** if they raise wrongdoing concerns, as a matter of routine. However, this means that in a large proportion of organisations (29.1%), staff are either never provided with this advice, or only provided with it once they raise their concerns – including 27.5% of public sector organisations, 30% of private business, and 33.9% of not-for-profits (Q 17 b&c).

There was also a significant relationship between training and more general advice provision. In all categories – i.e. all classes and sizes – organisations that provided no specialist training to any staff were also less likely to provide any or proactive advice to individual staff on their rights and responsibilities if they reported. In other words, lack of training was not being compensated for by more general advice provision, or vice versa. These results underscore the extent to which implementation of good reporting processes remains a significant challenge across all types, with some organisations making comprehensive efforts but others lacking key processes across the board.

Reporting and response channels

All organisations identified at least one way in which wrongdoing concerns could be raised in their organisation, such as in person or by general email; and 97.4% indicated at least two such ways (Q12).

Dedicated telephone hotlines, or email/online dropboxes were less prevalent than expected. Only 43.0% of organisations reported having either or both of these dedicated channels, particularly private business (52.3%) and large organisations (73.2%). In all, 37.9% of all organisations provided a dedicated email or online dropbox (43.3% of private business), and 27.1% provided a dedicated hotline (46.7% of private business) (Q12).

These results emphasise the importance of normal, informal communication channels for reporting, especially in medium and small organisations – but may also indicate greater scope for the use of dedicated channels across a wide range.

There were differences in **the persons or points** to whom staff may report wrongdoing concerns (Fig 1). Almost all (99.0%) of organisations identified senior management or the CEO and/or immediate supervisors as persons with whom staff could raise concerns (Q14 a/b), confirming the importance of normal organisational responsibilities and channels.

For external options, however, there were major differences between sectors – with a clear relationship with the different legislative or regulatory arrangements present for different sectors, along with possible differences in context and culture:

- If necessary, **external ombudsmen, integrity or regulatory agencies** were identified as another available reporting channel by 94.7% of public organisations, but only 55.7% of not-for-profits and 44.7% of private business (Q14 i);
- The **media/journalists** were identified as available 'if necessary' by 23.8% of public organisations, but only 5.2% of not-for-profits and 4.0% of private business (Q14 k).

As expected, **boards or audit committees** were more likely to be identified as whistleblowing recipients by not-for-profits (62.6%) or private organisations (59.3%), than by public sector organisations (49.0%).

Figure 1. **With whom are staff and others in your organisation allowed to raise wrongdoing concerns? (Q14)**

Percentage of organisations selecting as available.

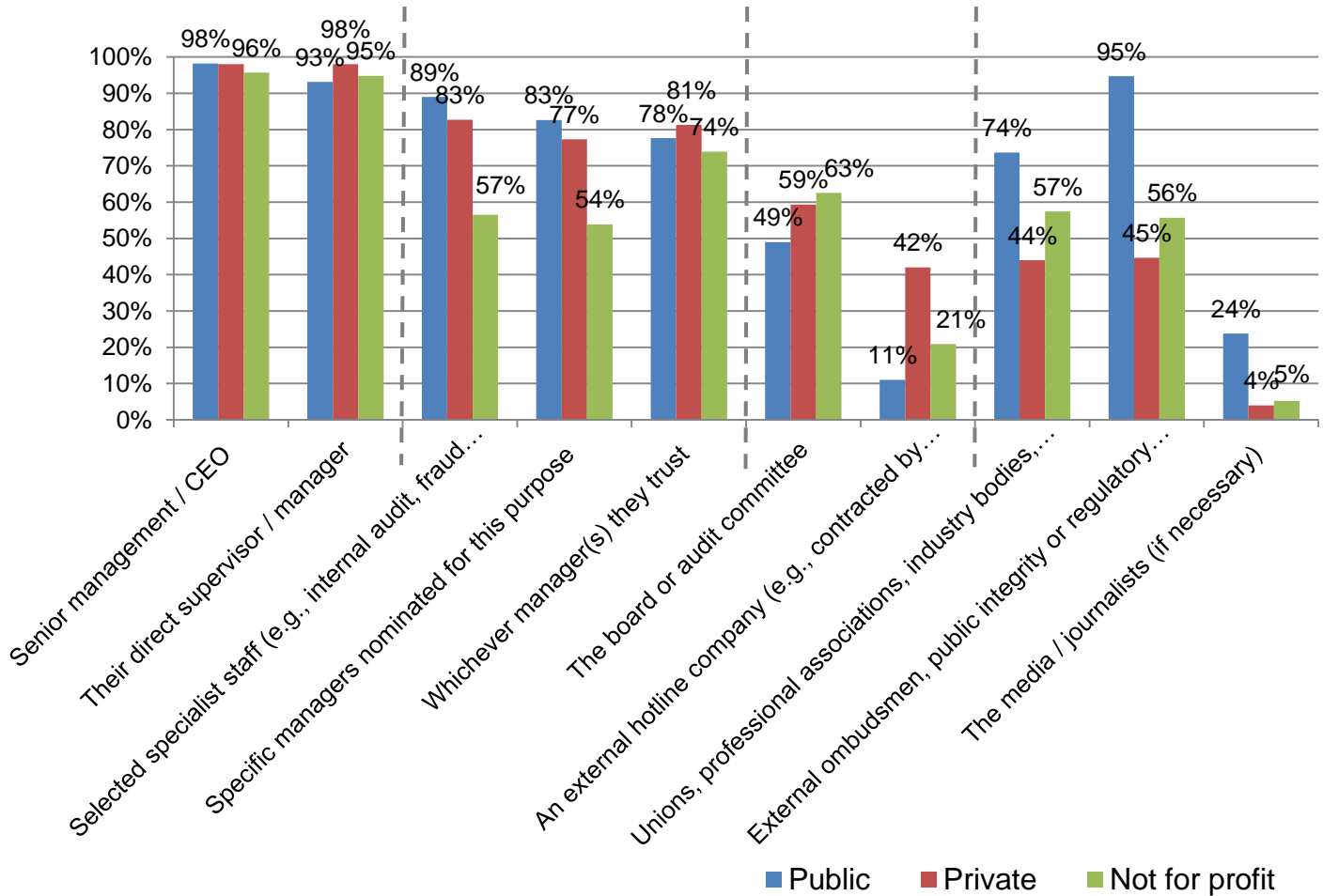
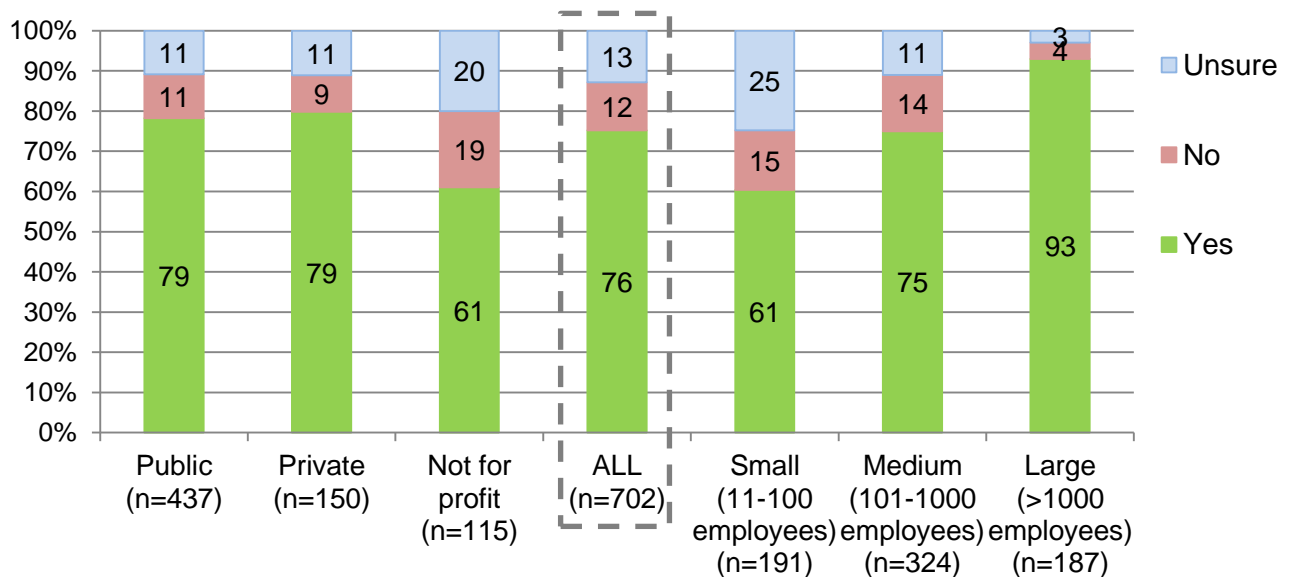


Figure 2. **Does your organisation accept anonymous concerns – ... without requiring staff members to identify themselves? (Q13)**



Public sector (89.0%) and private organisations (82.7%) were more likely to identify **specialist governance staff** (internal audit, human resources etc) as an available reporting channel than not-for-profits (56.5%) (Q14 e). Similarly, public sector (82.6%) and private organisations (77.3%) were more likely to identify that **specific managers** had been nominated as reporting points, than not-for-profits (53.9%); and not-for-profits were the least likely to identify that staff could raise wrongdoing concerns with **whichever managers they trust** (73.9%) (Q14 d).

Overall, these results highlight the challenges for not-for-profit and business organisations resulting from fewer recognised options for wrongdoing reporting, than in the public sector, which are outside the existing management chain.

Significantly, 75.8% of organisations, including 79.3% of private business, accept **anonymous** wrongdoing concerns – i.e. ‘receive and act on concerns without requiring staff members to identify themselves’ (Q13, Fig 2). This was especially true of large organisations (92.5%) where anonymity is more feasible, as against small organisations (60.7%). Not-for-profits were least likely to accept anonymous concerns (60.9%).

This has implications for law reform. Currently most if not all legislative protections for public sector whistleblowing apply to anonymous concerns (e.g. if the reporter is later identified), but private sector protections such as Part 9.4AAA of the *Corporations Act 2001* (Cth) require the reporter to first identify themselves. These results suggest such restrictions are widely out of step with corporate practices and preferences.

As already noted, 22.5% of organisations (especially not-for-profit organisations, 35.6%, and small organisations, 37.1%) reported that they had no particular system in place for **recording and tracking** the wrongdoing concerns raised (either at all, or unless or until they were raised) (Q15 c/d). Among the remainder, there were significant differences by sector and size as to when they rely on specialist staff (e.g. internal audit, ethical standards, human resources) for this function, or on management in general.

While 65.4% of public sector organisations (and 75.9% of large organisations) rely on **specialist staff** to record and track their wrongdoing concerns, this was the case in 51.3% of private business (only 16.7% of which had a system where every manager was meant to record such issues) and in only 28.7% of not-for-profits (where, in 31.3% of cases, reliance was on **every manager** to record such issues) (Q15 a/b).

Support and protection

As noted in Section 1, prior public sector research indicates that while organisations may have processes which encourage and facilitate staff reporting of wrongdoing, and deal with alleged wrongdoing, often the weakest elements have been mechanisms for protection and support of the staff who report.

These results indicate that this broad challenge remains in the public sector, and is also present to a high level in the private and non-for-profit sectors – even among respondent organisations placing a high priority on reporting processes. Significantly lower proportions of organisations had specific processes or programs for supporting staff who report, than had processes for investigating or dealing with the concerns raised.

In particular, 22.8% of all organisations, and especially 32.7% of businesses and 33.9% of not-for-profits, currently had **no specific strategy, program or process for delivering support and protection** to staff who raise concerns (Q21 c, Fig 3). Another 26.8% of organisations (including 29.3% of private business and 29.4% of large organisations) relied on setting up such a strategy as needed, rather than having any standing support program (Q21 b) (a total of 62.0% of private business, and 49.6% of all organisations).

Figure 3. Does your organisation have a strategy, or program, for delivering support and protection to staff who raise concerns about wrongdoing? (Q21)

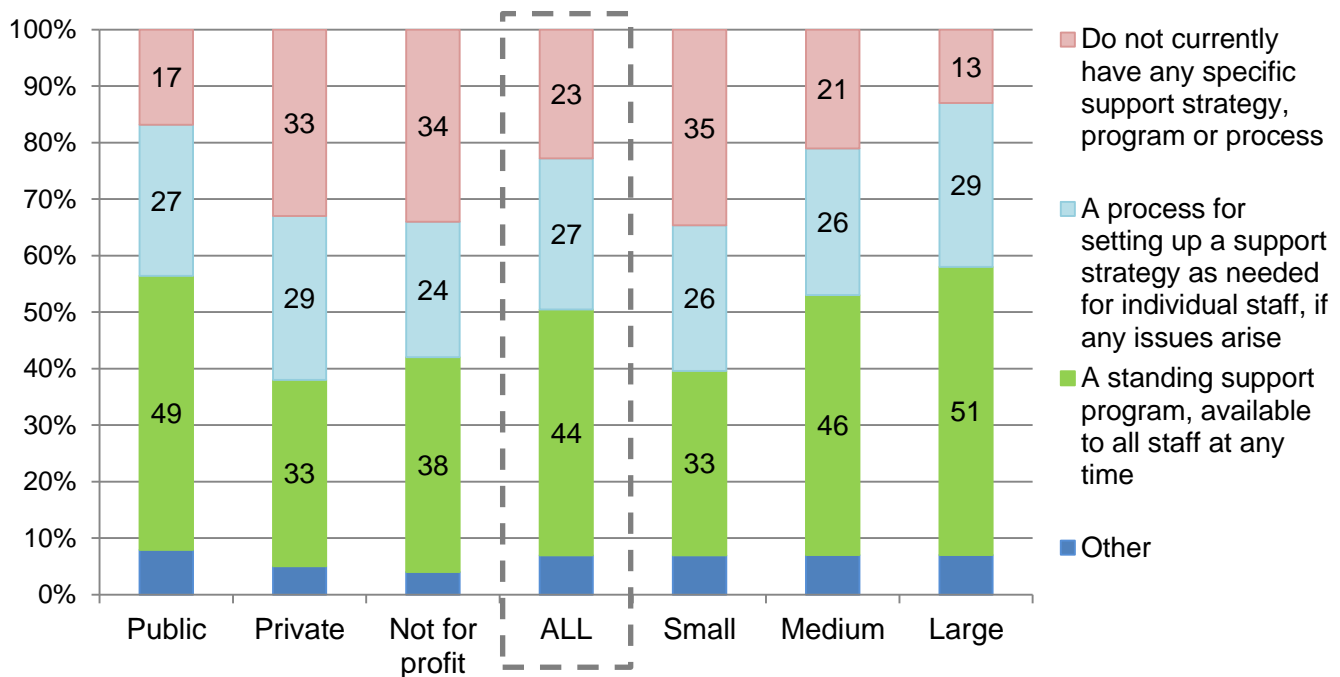
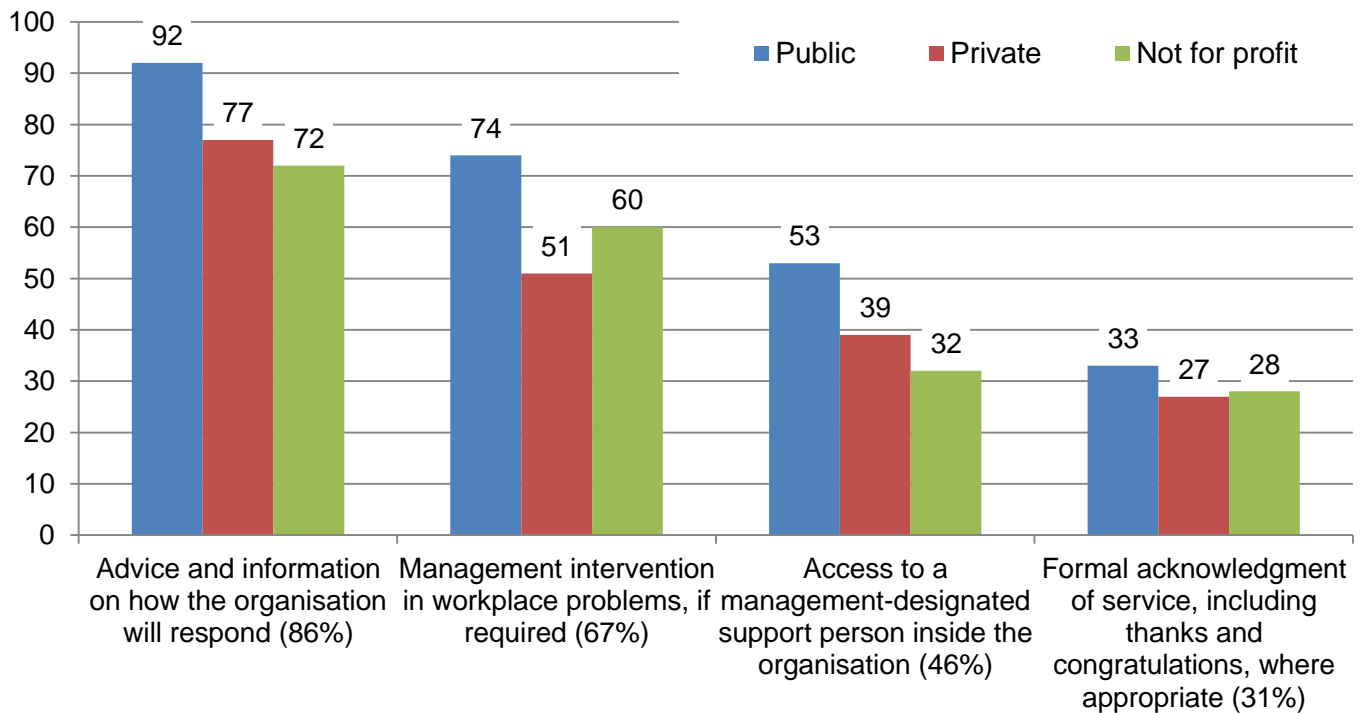


Figure 4. What types of support are available for staff who raise wrongdoing concerns in your organisations? (Q22)

As many as apply. (Select options shown only.)



While only 3.8% of organisations (including 8.7% of not for profits) indicated that they provided **no types of support** for staff who raise wrongdoing concerns, most support is either informational or generalised (e.g. standard support available to any staff with problems) (Fig 4). Specific support relating to reporting is most often limited or reactive:

- Less than a third of organisations (31.2%) provide formal acknowledgement of service such as **thanks or congratulations** where appropriate – including only 27.3% of business and 27.8% of not-for-profits (Q22j).
- Less than half of organisations (46.2%) provide **access to a management-designated support person** inside the organisation, in advance or irrespective of any problems arising – including only 39.3% of private business and 32.2% of not-for-profits (Q22 d).
- Only two thirds of organisations (66.8%) provide management intervention in workplace problems, if required; with this falling to **only 60% of not-for-profits** and **50.7% of private business** (Q22 h).

Where staff experience reprisals, conflicts, stress or other detrimental impacts for reporting, a substantial proportion of organisations report having no or limited processes for seeking a resolution. The most common responses were management intervention to stop the problem (rising to 77.2% of all organisations) and disciplinary action against the persons responsible for the problems (74.4% of organisations) (Q23 c,d; Fig 5).

However, if such reprisals or other detrimental impacts occur:

- Fifteen percent of organisations, including 19.3% of business and 24.3% of not-for-profits, admitted to having **no particular processes** for seeking a resolution to any problems that could arise – especially small organisations (24.6%) (Q23 g); and
- Only 16.4% of organisations reported having **mechanisms for ensuring adequate compensation or restitution** for the whistleblower – including 17.3% of business, 16.9% of public sector organisations, and 13% of not-for-profits (Q23a).

This means that more than 80% of organisations have no such mechanisms. This is largely irrespective not only of sector, but of size – it is true for 89% of small organisations, but also for more than three-quarters (77%) of large organisations.

While these results confirm significant challenges and gaps, the data indicate where some of these may relate more to issues of capacity, process and knowledge than lack of will.

For example:

- While 84.6% of organisations reported having processes for **assessing concerns to ensure they are dealt with by the most appropriate people** in the organisation (Q16 a), a much lower proportion (70.9%) reported having processes for then also **coordinating the responses to concerns**, where different aspects are being dealt with by different people (Q16 b), even though both challenges are known to be key sources of problems giving rise to detrimental impacts (stress, unmanaged conflict or reprisals) for staff who raise wrongdoing concerns;
- In all categories of sector and size (r ranging from .210 to .276, $p < .001$), whether access to management-designated support was provided (Q22d above) was positively and significantly correlated with whether or not the organisation had an organised or standing support program, rather than an ad hoc or no program.

Figure 5. Where staff experience issues (e.g., reprisals, workplace conflicts, stress or other detrimental impacts) after raising wrongdoing concerns, what processes does your organisation have for seeking a resolution? (Q23)

As many as apply. (Select options shown only.)

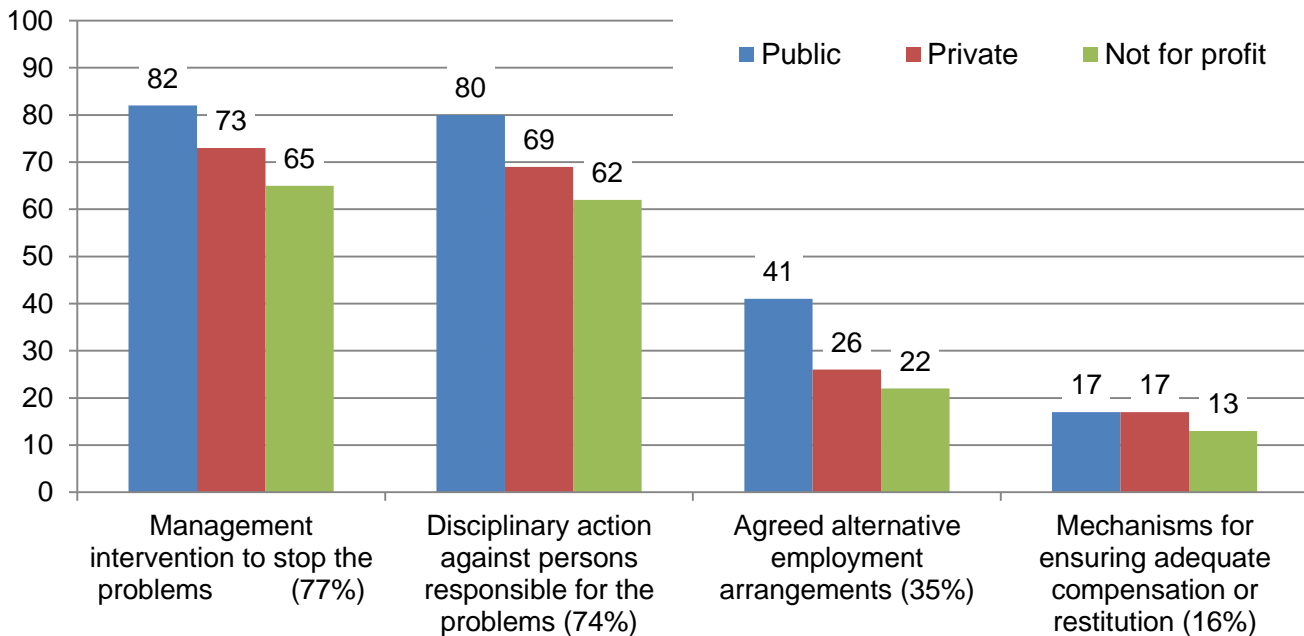


Table 5: Relationship between documented risk assessment processes (Q18a) and management-designated support / intervention (Q22d/h) (n=537 organisations)

| Organisations | | Relation between documented risk assessment and | | |
|----------------|--------|---|---|--------|
| Sector/size | Number | Access to management-designated support person | Management intervention in workplace problems if required | Both |
| Public | 364 | .198** | .125* | .213** |
| Private | 96 | .138 | .090 | .148 |
| Not for profit | 77 | .191 | .028 | .144 |
| Small | 129 | .071 | .102 | .120 |
| Medium | 247 | .269** | .157* | .272** |
| Large | 161 | .164* | .020 | .139 |
| All | 537 | .179** | .095* | .179** |

Relationship significant at a level of * $p < .05$ / ** $p < .001$.

Further, over a third of organisations (37.7%), including half of businesses and not-for-profits (48.7% and 51.3% respectively), indicated they **did not assess the risks of detrimental impacts** that staff might experience from raising wrongdoing concerns, either at all or until after any actual conflicts or problems began to arise (Q18 b&c).

While 56.4% of organisations indicated that they *did* begin assessing the risks at an earlier stage, in only 36.2% of all organisations were these also usually documented (40.5% of public, 30% of private business and 19.1% of not-for-profits: Q18a a/b). These results leave room for doubt over whether risks are adequately assessed in over 60% of organisations (59.5% of public, 70% of private business and 80.9% of not-for-profits).

There was no relationship between the nature of an organisation's support program (standing, reactive or absent) and whether or not an organisation routinely conducted (and documented) assessment of the risks of problems when staff reported.

However, as shown in Table 5, there were significant correlations between whether an organisation conducted and documented such risk assessments, and whether it also then offered access to management-designated support (Q22 d) and/or management intervention in the event of problems (Q22 h) – particularly in medium-sized and public sector organisations, being those in which such assessment is more likely to occur.

These results thus point to immediate areas where apparent weaknesses in processes may be addressed by clearer identification of successful practice and improvements in knowledge and guidance. At the same time, other gaps, such as the lack of processes for seeking adequate resolutions in cases of detrimental impact, may require a combination of stronger management commitment and regulatory reform.

4. Conclusions and next stage

The response to the WWTW2 Survey of Organisational Processes and Procedures confirms the strong efforts that many public, private and not-for-profit organisations are making towards whistleblower protection, and affirms the central role that whistleblowing plays in integrity and good governance systems across the sectors.

Many results nevertheless indicate that even when trying hard to encourage their staff to report, too many organisations lack the specific guidance and incentives they need to realise their own goals of actual protection.

Some apparent weaknesses may be addressed by clearer identification of successful practice and improvements in knowledge and guidance. The continuing research, through the main Integrity@WERQ phase of the WWTW2 project, is aimed at identifying more clearly whether this is the case, and which organisational processes and management systems contribute to the best outcomes for both employees and organisations.

In particular, the results confirm the value of a stronger conceptual and policy framework for assessing the adequacy of support processes for staff who raise public interest wrongdoing concerns, including the extent of organisational efforts and capacities in:

1. Reprisal / detriment risk assessment
2. Support provision
3. Proactive management intervention
4. Reactive management intervention, and
5. Remediation.

Other gaps – such as the lack of processes for seeking adequate resolutions in cases of detrimental impact – may require a combination of stronger management commitment and regulatory reform.

Although most Australian governments have recently modernised their whistleblowing regimes, such results point to a need for further reform and stronger oversight even in the public sector. They also confirm that for the private and not-for-profit sectors, a well-informed legislative overhaul is especially overdue.

Along with further analysis of these data, results from the Integrity@WERQ phase of the research are expected from mid-2017. Organisations wishing to participate in this or future phases of Integrity@WERQ are encouraged to contact the project team.

5. Full results by sector and organisation size

Q9. Some organisations have one process for responding to all types of staff concerns. Others have separate processes for responding to workplace grievances on the one hand, and for responding to wider wrongdoing concerns such as suspected fraud, theft, corruption, negligence or dangers to public health or safety, on the other hand. Which best describes your organisation's approach?

| | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|-------|---|--------------|--------------|----------------|-------------------|----------------------|------------------|--------------|
| c. | We have different processes for responding to workplace grievances, and for responding to wider wrongdoing concerns | 405 92.6% | 105 70.0% | 72 62.6% | 123 64.3% | 291 89.8% | 168 89.8% | 582 82.9% |
| b. | We use our workplace grievance process to respond to all wrongdoing concerns | 15 3.4% | 25 16.6% | 26 22.6% | 40 20.9% | 17 5.2% | 9 4.8% | 66 9.4% |
| a. | We only have a process for responding to workplace grievances | 9 2.1% | 12 8.0% | 13 11.3% | 20 10.4% | 11 3.3% | 3 1.6% | 34 4.8% |
| d. | Other | 8 1.8% | 8 5.3% | 4 3.4% | 8 4.2% | 5 1.5% | 7 3.7% | 20 2.8% |
| Total | | 437 100% | 150 100% | 115 100% | 191 100% | 324 100% | 187 100% | 702 100% |

Q28a. (if c to Q9). Please compare your organisation's process for responding to workplace grievances, with the processes that you have outlined earlier for responding to wider wrongdoing concerns. Which of the following statements best describes your organisation's approach?

| | | | | | | | | |
|-------|---|---------------|---------------|--------------|---------------|---------------|---------------|--------------|
| c. | The processes are different but equally comprehensive | 307 75.8% | 73 69.5% | 40 55.6% | 89 72.4% | 198 68.0% | 133 79.2% | 420 72.2% |
| a. | Our organisation's workplace grievance processes are more comprehensive than our processes for responding to wider wrongdoing concerns | 74 18.3% | 19 18.1% | 26 36.1% | 25 20.3% | 69 23.7% | 25 14.9% | 119 20.4% |
| b. | Our organisation's workplace grievance processes are less comprehensive than our processes for responding to wider wrongdoing concerns | 24 5.9% | 13 12.4% | 6 8.3% | 9 7.3% | 24 8.2% | 10 6.0% | 43 7.4% |
| Total | | 405 100.0% | 104 100.0% | 72 100.0% | 122 100.0% | 291 100.0% | 168 100.0% | 581 100% |

Q10. Does your organisation encourage or require staff to report concerns about the following types of wrongdoing?

Percentage responding: 'Yes, identified as something staff can or should report' (more than one response allowed)

| | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|-------|--|--------------|--------------|----------------|-------------------|----------------------|------------------|--------------|
| a. | Fraud or theft | 433 | 146 | 102 | 178 | 318 | 185 | 681 |
| | | 99.0% | 97.3% | 88.6% | 93.1% | 98.1% | 98.9% | 97.0% |
| c. | Conflicts of interest | 433 | 138 | 101 | 175 | 314 | 183 | 672 |
| | | 99.1% | 92.0% | 87.8% | 91.6% | 96.9% | 97.9% | 95.7% |
| f. | Misuse of information, including unauthorised access or release | 423 | 138 | 94 | 168 | 306 | 181 | 655 |
| | | 96.8% | 92.0% | 81.7% | 88.0% | 94.4% | 96.8% | 93.3% |
| b. | Corruption (including bribery or favouritism) | 428 | 138 | 83 | 156 | 310 | 183 | 649 |
| | | 97.9% | 92.0% | 72.2% | 81.7% | 95.7% | 97.9% | 92.5% |
| g. | Abuse or mistreatment of clients, customers, or the public | 393 | 130 | 99 | 162 | 289 | 171 | 622 |
| | | 89.9% | 86.7% | 86.1% | 84.8% | 89.2% | 91.4% | 88.6% |
| h. | Dangers to public health, safety or the environment, including unsafe products or services | 400 | 130 | 89 | 158 | 290 | 171 | 619 |
| | | 91.5% | 86.7% | 77.4% | 82.7% | 89.5% | 91.4% | 88.2% |
| i. | Perverting justice or accountability (including covering up other wrongdoing) | 402 | 122 | 77 | 149 | 279 | 173 | 601 |
| | | 92.0% | 81.3% | 67.0% | 78.0% | 86.1% | 92.5% | 85.6% |
| d. | Waste or mismanagement of resources | 365 | 94 | 64 | 125 | 243 | 155 | 523 |
| | | 83.5% | 62.7% | 55.7% | 65.4% | 75.0% | 82.9% | 74.5% |
| e. | Defective, negligent or improper decisions (including unrectified mistakes) | 346 | 108 | 69 | 128 | 247 | 148 | 523 |
| | | 79.2% | 72.0% | 60.0% | 67.0% | 76.2% | 79.1% | 74.5% |
| Total | | 437 | 150 | 115 | 191 | 324 | 187 | 702 |

Q11. Who is able to raise concerns about these types of wrongdoing, under your organisation's processes?

Percentage responding 'Yes' (more than one response allowed)

| | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|-------|--|--------------|--------------|----------------|-------------------|----------------------|------------------|--------------|
| a. | Permanent and / or full-time employees | 436 | 149 | 109 | 185 | 324 | 185 | 694 |
| | | 99.8% | 99.3% | 94.8% | 96.9% | 100% | 98.9% | 99.4% |
| b. | Part-time employees | 435 | 147 | 108 | 183 | 322 | 185 | 690 |
| | | 99.5% | 98.0% | 93.9% | 95.8% | 99.4% | 98.9% | 99.0% |
| c. | Casual employees | 421 | 140 | 105 | 172 | 315 | 178 | 666 |
| | | 96.3% | 93.3% | 91.3% | 90.1% | 97.2% | 95.2% | 95.7% |
| e. | Consultants, contractors, and / or sub-contractors | 396 | 121 | 85 | 151 | 276 | 175 | 602 |
| | | 90.6% | 80.7% | 73.9% | 79.1% | 85.2% | 93.6% | 86.9% |
| g. | Clients or other members of the public | 392 | 112 | 91 | 153 | 273 | 169 | 595 |
| | | 89.7% | 74.7% | 79.1% | 80.1% | 84.3% | 90.4% | 85.8% |
| f. | Employees of contractors and / or sub-contractors | 365 | 102 | 71 | 129 | 244 | 165 | 538 |
| | | 83.5% | 68.0% | 61.7% | 67.5% | 75.3% | 88.2% | 78.0% |
| d. | Volunteers | 323 | 56 | 87 | 104 | 220 | 142 | 466 |
| | | 73.9% | 37.3% | 75.7% | 54.5% | 67.9% | 75.9% | 67.9% |
| Total | | 437 | 150 | 115 | 191 | 324 | 187 | 702 |

Q12. How can these concerns about wrongdoing be raised in your organisation? Percentage responding 'Yes' (more than one response allowed)

| | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|-------|---|---------------------|---------------------|---------------------|---------------------|----------------------|---------------------|---------------------|
| b. | In writing or by general email | 429 98.2% | 142 94.7% | 109 94.8% | 182 95.3% | 317 97.8% | 181 96.8% | 680 96.9% |
| a. | In person | 424 97.0% | 146 97.3% | 108 93.9% | 185 96.9% | 310 95.7% | 183 97.9% | 678 96.5% |
| c. | Via the general phone system | 372 85.1% | 108 72.0% | 84 73.0% | 140 73.3% | 266 82.1% | 158 84.5% | 564 80.3% |
| e. | Via a dedicated email or online dropbox | 167 38.2% | 65 43.3% | 34 29.6% | 40 20.9% | 105 32.4% | 121 64.7% | 266 37.9% |
| d. | Via a dedicated telephone hotline | 100 22.9% | 70 46.7% | 20 17.4% | 25 13.1% | 58 17.9% | 107 57.2% | 190 27.1% |
| | <i>Either of the above (e/d)</i> | 181 41.4% | 80 52.3% | 41 35.6% | 46 24.0% | 119 36.7% | 137 73.2% | 302 43.0% |
| f. | Other | 74 16.9% | 30 20.0% | 26 22.6% | 34 17.8% | 54 16.7% | 42 22.5% | 130 18.5% |
| Total | | 437 | 150 | 115 | 191 | 324 | 187 | 702 |

Q13. Does your organisation accept anonymous concerns – in other words, receive and act on concerns without requiring staff members to identify themselves?

| | | | | | | | | |
|-------|------------------------------------|---------------------|---------------------|--------------------|---------------------|---------------------|---------------------|---------------------|
| a. | Yes | 343 78.5% | 119 79.3% | 70 60.9% | 116 60.7% | 243 75.0% | 173 92.5% | 532 75.8% |
| b. | No | 46 10.5% | 14 9.3% | 22 19.1% | 28 14.7% | 46 14.2% | 8 4.3% | 82 11.7% |
| c. | Unsure / Information not available | 48 11.0% | 17 11.3% | 23 20.0% | 47 24.6% | 35 10.8% | 6 3.2% | 88 12.5% |
| Total | | 437 100% | 150 100% | 115 100% | 191 100% | 324 100% | 187 100% | 702 100% |

Q14. With whom are staff and others in your organisation allowed to raise wrongdoing concerns? Percentage responding 'Yes'.

| | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|-------|---|---------------------|---------------------|---------------------|---------------------|----------------------|---------------------|---------------------|
| b. | Senior management / CEO | 429 98.2% | 147 98.0% | 110 95.7% | 187 97.9% | 319 98.5% | 180 96.3% | 686 97.7% |
| a. | Their direct supervisor / manager | 407 93.1% | 147 98.0% | 109 94.8% | 179 93.7% | 302 93.2% | 182 97.3% | 663 94.4% |
| e. | Selected specialist staff (e.g., internal audit, fraud control, ethical standards, human resources ...) | 389 89.0% | 124 82.7% | 65 56.5% | 118 61.8% | 286 88.3% | 174 93.0% | 578 82.3% |
| d. | Whichever manager(s) they trust | 339 77.6% | 122 81.3% | 85 73.9% | 145 75.9% | 242 74.7% | 159 85.0% | 546 77.8% |
| i. | External ombudsmen, public integrity or regulatory agencies (if necessary) | 414 94.7% | 67 44.7% | 64 55.7% | 123 64.4% | 265 81.8% | 157 84.0% | 545 77.6% |
| c. | Specific managers nominated for this purpose | 361 82.6% | 116 77.3% | 62 53.9% | 109 57.1% | 263 81.2% | 167 89.3% | 539 76.8% |
| j. | Unions, professional associations, industry bodies, or other external organisations (if necessary) | 322 73.7% | 66 44.0% | 66 57.4% | 100 52.4% | 219 67.6% | 135 72.2% | 454 64.7% |
| f. | The board or audit committee | 214 49.0% | 89 59.3% | 72 62.6% | 103 53.9% | 167 51.5% | 105 56.1% | 375 53.4% |
| g. | An external hotline company (e.g., contracted by the organisation) | 48 11.0% | 63 42.0% | 24 20.9% | 17 8.9% | 49 15.1% | 69 36.9% | 135 19.3% |
| k. | The media / journalists (if necessary) | 104 23.8% | 6 4.0% | 6 5.2% | 9 4.7% | 52 16.0% | 55 29.4% | 116 16.5% |
| h. | An independent advice line (e.g., run by a public interest group) | 45 10.3% | 23 15.3% | 9 7.8% | 13 6.8% | 33 10.2% | 31 16.6% | 77 11.0% |
| Total | | 437 | 150 | 115 | 191 | 324 | 187 | 702 |

[illegible]

Q16. Does your organisation have processes for the following?

Percentage selecting this process (apart from g, more than one response allowed)

| | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|-------|---|---------------------|---------------------|--------------------|---------------------|----------------------|---------------------|---------------------|
| c. | Ensuring appropriate investigations or management actions are undertaken in response to concerns | 408 93.4% | 127 84.7% | 97 84.3% | 157 82.2% | 300 92.6% | 175 93.6% | 632 90.0% |
| d. | Documenting actions and outcomes, including any changes or improvements made as a result of staff concerns | 390 89.2% | 125 83.3% | 88 76.5% | 155 81.2% | 280 86.4% | 168 89.8% | 603 85.9% |
| a. | Assessing concerns to ensure they are dealt with by the most appropriate people in the organisation | 389 89.0% | 120 80.0% | 85 73.9% | 140 73.3% | 279 86.1% | 175 93.6% | 594 84.6% |
| f. | Seeking external professional assistance for investigating or managing wrongdoing concerns | 371 84.9% | 106 70.7% | 73 63.5% | 123 64.4% | 265 81.8% | 162 86.6% | 550 78.3% |
| e. | Referring concerns or reports to independent integrity or regulatory agencies where necessary, or liaising with them on how concerns should be handed | 386 88.3% | 82 54.7% | 63 54.8% | 113 59.2% | 257 79.3% | 161 86.1% | 531 75.6% |
| b. | Coordinating the responses to concerns, where different aspects are being dealt with by different people | 329 75.3% | 98 65.3% | 71 61.7% | 109 57.1% | 234 72.2% | 155 82.9% | 498 70.9% |
| h. | Other | 18 4.1% | 4 2.7% | 7 6.1% | 6 3.1% | 11 3.4% | 12 6.4% | 29 4.1% |
| g. | No, our organisation has none of these processes for dealing with wrongdoing concerns | 7 1.6% | 9 6.0% | 11 9.6% | 15 7.9% | 9 2.8% | 3 1.6% | 27 3.8% |
| Total | | 437 | 150 | 115 | 191 | 324 | 187 | 702 |

[illegible]

Q18. When staff raise wrongdoing concerns, does your organisation assess the risks of any detrimental impacts they may experience? (e.g., stress, workplace conflict, reprisals or other repercussions)

| | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|-------|---|--------------|-------------|----------------|-------------------|----------------------|------------------|--------------|
| a. | Starts assessing the risks against any staff member as soon as they raise a concern | 276 63.2% | 69 46.0% | 51 44.3% | 91 47.6% | 170 52.5% | 135 72.2% | 396 56.4% |
| b. | Assess the risks if and when any actual conflicts or problems begin to arise | 90 20.6% | 28 18.7% | 26 22.6% | 39 20.4% | 78 24.1% | 24 14.4% | 144 20.5% |
| c. | Does not currently have a process for assessing risks | 43 9.8% | 45 30.0% | 33 28.7% | 52 27.2% | 51 15.7% | 18 9.6% | 121 17.2% |
| d. | Other | 28 6.4% | 8 5.3% | 5 4.3% | 9 4.7% | 25 7.7% | 7 3.7% | 41 5.8% |
| Total | | 437 100% | 150 100% | 115 100% | 191 100% | 324 100% | 187 100% | 701 100% |

Q18a. (If a or b to Q18). Is this risk assessment documented?

| | | | | | | | | |
|-------|------------------------------------|--------------|-------------|-------------|-------------|-------------|-------------|--------------|
| a. | Always | 101 27.6% | 28 28.9% | 29 37.7% | 53 40.8% | 57 23.0% | 48 29.6% | 158 29.3% |
| b. | Usually | 110 30.1% | 34 35.1% | 20 26.0% | 42 32.3% | 71 28.6% | 51 31.5% | 164 30.4% |
| c. | Sometimes | 73 19.9% | 12 12.4% | 15 19.5% | 8 6.2% | 62 25.0% | 30 18.5% | 100 18.5% |
| d. | Rarely or never | 30 8.2% | 5 5.2% | 6 7.8% | 5 3.8% | 26 10.5% | 10 6.2% | 41 7.6% |
| e. | Unsure / information not available | 40 10.9% | 14 14.4% | 7 9.1% | 17 13.1% | 27 10.9% | 17 10.5% | 60 11.1% |
| f. | Other | 3.3% | 4.1% | 0.0% | 3.8% | 2.0% | 3.7% | 3.0% |
| Total | | 366 100% | 96 100% | 77 100% | 129 100% | 248 100% | 162 100% | 540 100% |

Q19. Who is responsible for addressing any problems, stress, conflicts, or reprisals that might arise for a staff member who has raised wrongdoing concerns? Percentage selecting each response (apart from g, more than one response allowed)

| | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|-------|--|--------------|--------------|----------------|-------------------|----------------------|------------------|--------------|
| f. | Other corporate governance staff (e.g., human resources, grievance officers, company secretary...) | 345 | 96 | 62 | 97 | 251 | 155 | 503 |
| | | 78.9% | 64.0% | 53.9% | 50.8% | 77.5% | 82.9% | 71.7% |
| a. | CEO | 275 | 68 | 76 | 144 | 187 | 88 | 419 |
| | | 62.9% | 45.3% | 66.1% | 75.4% | 57.7% | 47.1% | 59.7% |
| c. | The direct manager(s) of the staff member who raised the concern | 277 | 63 | 63 | 105 | 182 | 116 | 403 |
| | | 63.4% | 42.0% | 54.8% | 55.0% | 56.2% | 62.0% | 57.4% |
| b. | All managers | 210 | 53 | 69 | 112 | 137 | 82 | 331 |
| | | 48.1% | 35.3% | 60.0% | 58.6% | 42.3% | 43.9% | 47.2% |
| d. | Internal investigation staff (e.g., internal audit, fraud control, ethical standards) | 202 | 59 | 26 | 45 | 119 | 123 | 287 |
| | | 46.2% | 39.3% | 22.6% | 23.6% | 36.7% | 65.8% | 40.9% |
| e. | Whistleblower support unit (if applicable) | 64 | 27 | 11 | 9 | 49 | 44 | 102 |
| | | 14.6% | 18.0% | 9.6% | 4.7% | 15.1% | 23.5% | 14.5% |
| h. | Other | 38 | 24 | 12 | 18 | 23 | 33 | 74 |
| | | 8.7% | 16.0% | 10.4% | 9.4% | 7.1% | 17.6% | 10.5% |
| g. | No one currently has direct responsibility for this | 11 | 8 | 8 | 8 | 14 | 5 | 27 |
| | | 2.5% | 5.3% | 7.0% | 4.2% | 4.3% | 2.7% | 3.8% |
| Total | | 437 | 150 | 115 | 191 | 324 | 187 | 702 |

Q20. How does your organisation manage issues of confidentiality when staff raise wrongdoing concerns? Our organisation has processes for:
Percentage selecting each response (apart from e, more than one response allowed)

| | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|-------|--|---------------------|---------------------|--------------------|---------------------|----------------------|---------------------|---------------------|
| a. | Keeping the identity of staff who raise concerns as confidentiality as possible | 420 96.1% | 133 88.7% | 96 83.5% | 163 85.3% | 302 93.2% | 184 98.4% | 649 92.5% |
| c. | Maintaining the confidentiality of any persons against whom concerns have been raised | 361 82.6% | 108 72.0% | 72 62.6% | 126 66.0% | 252 77.8% | 163 87.2% | 541 77.1% |
| d. | Helping managers and staff deal with situations where confidentiality is impossible or unlikely to be maintained | 305 69.8% | 80 53.3% | 58 50.4% | 101 52.9% | 199 61.4% | 143 76.5% | 443 63.1% |
| b. | Consulting with staff about any action that could identify them, including to external agencies | 289 66.1% | 62 41.3% | 55 47.8% | 83 43.5% | 188 58.0% | 135 72.2% | 406 57.8% |
| e. | No, our organisation does not have any of the above processes for managing issues of confidentiality | 8 1.8% | 10 6.7% | 15 13.0% | 18 9.4% | 14 4.3% | 1 0.5% | 33 4.7% |
| f. | Other | 19 4.3% | 7 4.7% | 6 5.2% | 12 6.3% | 12 3.7% | 8 4.3% | 32 4.6% |
| Total | | 437 | 150 | 115 | 191 | 324 | 187 | 702 |

Q21. Does your organisation have a strategy, or program, for delivering support and protection to staff who raise concerns about wrongdoing?

| | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|----|---|---------------------|--------------------|--------------------|--------------------|----------------------|--------------------|---------------------|
| a. | Has a standing support program, available to all staff at any time | 213 48.7% | 50 33.3% | 44 38.3% | 62 32.5% | 150 46.3% | 95 50.8% | 307 43.7% |
| b. | Has a process for setting up a support strategy as needed for individual staff, if any issues arise | 117 26.8% | 44 29.3% | 27 23.5% | 49 25.7% | 84 25.9% | 55 29.4% | 188 26.8% |
| c. | Does not currently have any specific support strategy, program or process | 72 16.5% | 49 32.7% | 39 33.9% | 67 35.1% | 69 21.3% | 24 12.8% | 160 22.8% |
| d. | Other (please specify) | 35 8.0% | 7 4.7% | 5 4.3% | 13 6.8% | 21 6.5% | 13 7.0% | 47 6.7% |
| | Total | 437 100% | 150 100% | 115 100% | 191 100% | 324 100% | 187 100% | 702 100% |

Q22. What types of support are available for staff who raise wrongdoing concerns in your organisations? Percentage selecting as available.

| | | Public | Private | Not For Profit | Small | Medium | Large | Total |
|----|---|---------------------|---------------------|--------------------|---------------------|---------------------|---------------------|---------------------|
| a. | Advice and information on how the organisation will respond | 402 92.0% | 116 77.3% | 83 72.2% | 151 79.1% | 278 85.8% | 172 92.0% | 601 85.6% |
| f. | Access to external employee support services (e.g., Employee Assistance Programs) | 397 90.8% | 101 67.3% | 78 67.8% | 117 61.3% | 285 88.0% | 174 93.0% | 576 82.1% |
| c. | Advice about outcomes, including any actions taken, benefits or changes made | 353 80.8% | 100 66.7% | 70 60.9% | 128 67.0% | 246 75.9% | 149 79.7% | 523 74.5% |
| h. | Management intervention in workplace problems, if required | 324 74.1% | 76 50.7% | 69 60.0% | 100 52.4% | 216 66.7% | 153 81.8% | 469 66.8% |
| b. | Progress reports on the response | 291 66.6% | 89 59.3% | 64 55.7% | 104 54.5% | 205 63.3% | 133 71.1% | 444 63.2% |
| d. | Access to a management-designated support person inside the organisation | 228 52.5% | 59 39.3% | 37 32.2% | 68 35.6% | 152 46.9% | 104 55.6% | 324 46.2% |
| e. | Access to professional stress management, counselling or legal services | 199 45.5% | 55 36.7% | 40 34.8% | 62 32.5% | 146 45.1% | 86 46.0% | 294 41.9% |
| i. | Physical protection or relocation, if required | 204 46.7% | 42 28.0% | 23 20.0% | 38 19.9% | 126 38.9% | 105 56.1% | 269 38.3% |
| j. | Formal acknowledgment of service, including thanks and congratulations, where appropriate | 146 33.4% | 41 27.3% | 32 27.8% | 57 29.8% | 90 27.8% | 72 38.5% | 219 31.2% |
| g. | Support from external public integrity or regulatory agencies | 159 36.4% | 17 11.3% | 17 14.8% | 44 23.0% | 95 29.3% | 54 28.9% | 193 27.5% |
| k. | Rewards or other incentives | 26 5.9% | 14 9.3% | 7 6.1% | 9 4.7% | 23 7.1% | 15 8.0% | 47 6.7% |
| m. | Other | 24 5.5% | 8 5.3% | 5 4.3% | 10 5.2% | 15 4.6% | 12 6.4% | 37 5.3% |
| l. | No particular types of support | 9 2.1% | 8 5.3% | 10 8.7% | 15 7.9% | 11 3.4% | 1 0.5% | 27 3.8% |
| | Total | 437 | 150 | 115 | 191 | 324 | 187 | 702 |

Q23. Where staff experience issues (e.g., reprisals, workplace conflicts, stress or other detrimental impacts) after raising wrongdoing concerns, what processes does your organisation have for seeking a resolution?

Percentage selecting this process as one the organisation has (apart from g, more than one response allowed)

| | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|-------|---|--------------|--------------|----------------|-------------------|----------------------|------------------|--------------|
| c. | Management intervention to stop the problems | 358 | 109 | 75 | 125 | 253 | 163 | 542 |
| | | 81.9% | 72.7% | 65.2% | 65.4% | 78.1% | 87.2% | 77.2% |
| d. | Disciplinary action against persons responsible for the problems | 348 | 103 | 71 | 114 | 244 | 164 | 522 |
| | | 79.6% | 68.7% | 61.7% | 59.7% | 75.3% | 87.7% | 74.4% |
| f. | Follow-up processes for ensuring the staff member's longer term welfare | 235 | 58 | 48 | 75 | 167 | 98 | 340 |
| | | 53.8% | 38.7% | 41.7% | 39.3% | 51.5% | 52.4% | 48.4% |
| b. | Agreed alternative employment arrangements | 180 | 39 | 25 | 33 | 117 | 94 | 244 |
| | | 41.2% | 26.0% | 21.7% | 17.3% | 36.1% | 50.3% | 34.8% |
| e. | A process for managers or the organisation to apologise | 107 | 21 | 27 | 31 | 75 | 49 | 155 |
| | | 24.5% | 14.0% | 23.5% | 16.2% | 23.1% | 26.2% | 22.1% |
| a. | Mechanisms for ensuring adequate compensation or restitution | 74 | 26 | 15 | 21 | 51 | 43 | 115 |
| | | 16.9% | 17.3% | 13.0% | 11.0% | 15.7% | 23.0% | 16.4% |
| g. | No particular processes for seeking a resolution | 48 | 29 | 28 | 47 | 47 | 11 | 105 |
| | | 11.0% | 19.3% | 24.3% | 24.6% | 14.5% | 5.9% | 15.0% |
| h. | Other | 44 | 14 | 11 | 22 | 32 | 15 | 69 |
| | | 10.1% | 9.3% | 9.6% | 11.5% | 9.9% | 8.0% | 9.8% |
| Total | | 437 | 150 | 115 | 191 | 324 | 187 | 702 |

Q24. So far, the questions above have asked about your organisation's processes and practices in general, including informal ones. Does your organisation also have formal, written procedures or policies which set out these processes (e.g., internal reporting procedures, formal whistleblowing policy?)

| | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|-------|-----|--------------|--------------|----------------|-------------------|----------------------|------------------|--------------|
| a. | Yes | 416 | 129 | 82 | 141 | 302 | 184 | 627 |
| | | 95.2% | 86.0% | 71.3% | 73.8% | 93.2% | 98.4% | 89.3% |
| b. | No | 21 | 21 | 33 | 50 | 22 | 3 | 75 |
| | | 4.8% | 14.0% | 28.7% | 26.2% | 6.8% | 1.6% | 10.7% |
| Total | | 437 | 150 | 115 | 191 | 324 | 187 | 702 |
| | | 100% | 100% | 100% | 100% | 100% | 100% | 100% |

Q25. How are staff made aware of your organisation's processes for responding to wrongdoing concerns?
Percentage selecting this method as used (apart from m, more than one response allowed)

| | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|----|---|--------------|--------------|----------------|-------------------|----------------------|------------------|--------------|
| d. | Information at induction / recruitment | 392 | 124 | 92 | 146 | 297 | 165 | 608 |
| | | 89.7% | 82.7% | 80.0% | 76.4% | 91.7% | 88.2% | 86.6% |
| c. | Access to procedures on our website / intranet site | 410 | 118 | 75 | 127 | 293 | 183 | 603 |
| | | 93.8% | 78.7% | 65.2% | 66.5% | 90.4% | 97.9% | 85.9% |
| a. | A code of conduct | 388 | 126 | 89 | 142 | 289 | 172 | 603 |
| | | 88.8% | 84.0% | 77.4% | 74.3% | 89.2% | 92.0% | 85.9% |
| b. | A published list of organisational policies or procedures | 371 | 115 | 81 | 131 | 270 | 166 | 567 |
| | | 84.9% | 76.7% | 70.4% | 68.6% | 83.3% | 88.8% | 80.8% |
| f. | General staff or manager training | 281 | 84 | 68 | 100 | 208 | 125 | 433 |
| | | 64.3% | 56.0% | 59.1% | 52.4% | 64.2% | 66.8% | 61.7% |

| (Q25 continued) | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|-----------------|---|--------|---------|----------------|-------------------|----------------------|------------------|-------|
| g. | Specific training about wrongdoing concerns for staff or managers | 240 | 70 | 31 | 54 | 163 | 124 | 341 |
| | | 54.9% | 46.7% | 27.0% | 28.3% | 50.3% | 66.3% | 48.6% |
| i. | Internal newsletters, bulletins, posters, and / or all-staff emails | 223 | 60 | 34 | 43 | 160 | 114 | 317 |
| | | 51.0% | 40.0% | 29.6% | 22.5% | 49.4% | 61.0% | 45.2% |
| j. | General statements by the CEO or directors to all staff | 212 | 62 | 34 | 63 | 140 | 105 | 308 |
| | | 48.5% | 41.3% | 29.6% | 33.0% | 43.2% | 56.1% | 43.9% |
| h. | Regular team and management meetings | 177 | 36 | 58 | 80 | 122 | 69 | 271 |
| | | 40.5% | 24.0% | 50.4% | 41.9% | 37.7% | 36.9% | 38.6% |
| e. | Information in position descriptions or employment contracts | 153 | 59 | 49 | 66 | 122 | 73 | 261 |
| | | 35.0% | 39.3% | 42.6% | 34.6% | 37.7% | 39.0% | 37.2% |
| l. | Statements and advice from each manager to their own staff | 136 | 30 | 31 | 39 | 98 | 60 | 197 |
| | | 31.1% | 20.0% | 27.0% | 20.4% | 30.2% | 32.1% | 28.1% |
| k. | Individual personal communication by the CEO with all staff | 93 | 28 | 25 | 37 | 70 | 39 | 146 |
| | | 21.3% | 18.7% | 21.7% | 19.4% | 21.6% | 20.9% | 20.8% |
| n. | Other | 26 | 10 | 5 | 6 | 20 | 15 | 41 |
| | | 5.9% | 6.7% | 4.3% | 3.1% | 6.2% | 8.0% | 5.8% |
| m. | None of the above | 0 | 1 | 4 | 4 | 0 | 1 | 5 |
| | | 0.0% | 0.7% | 3.5% | 2.1% | 0.0% | 0.5% | 0.7% |
| Total | | 437 | 150 | 115 | 191 | 324 | 187 | 702 |

Q26. Which staff in your organisation receive specialised training in relation to receiving and managing wrongdoing concerns, including training about staff support?

Percentage selecting each response (apart from e, more than one response allowed).

| | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|-------|---|--------------|--------------|----------------|-------------------|----------------------|------------------|--------------|
| d. | Selected specialist staff (e.g., internal audit, fraud control, ethical standards, human resources, grievance officers, public interest disclosure coordinator) | 271 | 55 | 39 | 56 | 176 | 133 | 365 |
| | | 62.0% | 36.7% | 33.9% | 29.3% | 54.3% | 71.1% | 52.0% |
| c. | Selected managers | 133 | 25 | 22 | 35 | 76 | 69 | 180 |
| | | 30.4% | 16.7% | 19.1% | 18.3% | 23.5% | 36.9% | 25.6% |
| e. | No staff currently receive specialised training in relation to this | 81 | 49 | 41 | 80 | 68 | 23 | 171 |
| | | 18.5% | 32.7% | 35.7% | 41.9% | 21.0% | 12.3% | 24.4% |
| b. | Everyone in a supervisor or management role | 97 | 22 | 26 | 31 | 61 | 53 | 145 |
| | | 22.2% | 14.7% | 22.6% | 16.2% | 18.8% | 28.3% | 20.7% |
| a. | All staff | 70 | 34 | 15 | 21 | 71 | 27 | 119 |
| | | 16.0% | 22.7% | 13.0% | 11.0% | 21.9% | 14.4% | 17.0% |
| f. | Other | 27 | 5 | 6 | 7 | 15 | 16 | 38 |
| | | 6.2% | 3.3% | 5.2% | 3.7% | 4.6% | 8.6% | 5.4% |
| Total | | 437 | 150 | 115 | 191 | 324 | 187 | 702 |

Q27. Have your organisation's processes and procedures for responding to wrongdoing concerns been evaluated or reviewed?

Percentage selecting each response (responses a and b both allowed)

| | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|-------|--|--------------|--------------|----------------|-------------------|----------------------|------------------|--------------|
| b. | Yes, reviewed (e.g., updated to reflect new standards or requirements) | 337 77.1% | 104 69.3% | 66 57.4% | 122 63.9% | 245 75.6% | 140 74.9% | 507 72.2% |
| a. | Yes, evaluated (e.g., benchmarked, assessed for effectiveness) | 94 21.5% | 45 30.0% | 21 18.3% | 27 14.1% | 65 20.1% | 68 36.4% | 160 22.8% |
| c. | No, neither evaluated nor reviewed | 43 9.8% | 21 14.0% | 27 23.5% | 43 22.5% | 37 11.4% | 11 5.9% | 91 13.0% |
| d. | Unsure / unknown | 20 4.6% | 6 4.0% | 12 10.4% | 14 7.3% | 13 4.0% | 11 5.9% | 38 5.4% |
| Total | | 437 | 150 | 115 | 191 | 324 | 187 | 702 |

Q27a. (if a to Q27). What type of evaluation did you contact? The evaluation of our organisation's processes and procedures:

Percentage selecting each response (apart from f, more than one response allowed)

| | | | | | | | | |
|-------|---|-------------|-------------|-------------|-------------|-------------|-------------|--------------|
| d. | Was reported to the CEO, audit committee, board or external stakeholders | 66 70.2% | 38 84.4% | 15 71.4% | 22 81.5% | 47 72.3% | 50 73.5% | 119 74.4% |
| b. | Included engagement with staff | 57 60.6% | 24 53.3% | 15 71.4% | 17 63.0% | 38 58.5% | 41 60.3% | 96 60.0% |
| c. | Included engagement with relevant external stakeholders (e.g., unions, professional organisations, public interest groups, ...) | 51 54.3% | 12 26.7% | 12 57.1% | 11 40.7% | 31 47.7% | 33 48.5% | 75 46.9% |
| a. | Was conducted by independent experts or consultants | 39 41.5% | 19 42.2% | 10 47.6% | 11 40.7% | 30 46.2% | 27 39.7% | 68 42.5% |
| e. | Other | 19 20.2% | 7 15.6% | 1 4.8% | 4 14.8% | 7 10.8% | 16 23.5% | 27 16.9% |
| f. | None of the above | 0 0.0% | 2 4.4% | 2 9.5% | 1 3.7% | 3 4.6% | 0 0.0% | 4 2.5% |
| Total | | 94 | 45 | 21 | 27 | 65 | 68 | 160 |

Q28. We are also interested in your processes for responding to personal and workplace grievances. Does your organisation encourage or require staff to report concerns about the following types of grievance?

Percentage responding: 'Yes, identified as something staff can or should report' (more than one response allowed)

| | | Public | Private | Not For Profit | Small (11-100) | Medium (101-1000) | Large (>1000) | Total |
|-------|--|--------------|--------------|----------------|-------------------|----------------------|------------------|--------------|
| b. | Workplace health or safety breaches | 434 | 148 | 111 | 187 | 321 | 185 | 693 |
| | | 99.3% | 98.7% | 96.5% | 97.9% | 99.1% | 98.9% | 98.7% |
| c. | Bullying | 434 | 148 | 109 | 183 | 323 | 185 | 691 |
| | | 99.3% | 98.7% | 94.8% | 95.8% | 99.7% | 98.9% | 98.4% |
| d. | Workplace discrimination or harassment | 434 | 149 | 108 | 183 | 323 | 185 | 691 |
| | | 99.3% | 99.3% | 93.9% | 95.8% | 99.7% | 98.9% | 98.4% |
| a. | Unfair personnel practices | 389 | 122 | 92 | 155 | 273 | 175 | 603 |
| | | 89.0% | 81.3% | 80.0% | 81.2% | 84.3% | 93.6% | 85.9% |
| Total | | 437 | 150 | 115 | 191 | 324 | 187 | 702 |

For Q28a, see Q9 results.

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Appendix: Questionnaire



Whistling While They Work 2: Improving managerial responses to whistleblowing in public and private sector organisations

Australian Research Council Linkage Project

Survey of Organisational Processes & Procedures

© Griffith University – April 2016

Introduction

This survey asks you to outline your organisation's key processes and procedures for facilitating and managing internal concerns, allegations or reports about wrongdoing.

The survey is part of a major research project, Whistling While They Work 2, investigating how organisational responses to whistleblowing can be improved across the public and private sectors. This project is led by Griffith University, University of Sydney, Australian National University and Victoria University of Wellington, funded by the Australian Research Council, and supported by partner organisations across Australia and New Zealand.

For more information on the project and this survey, as approved by the Griffith University Human Research Ethics Committee, you can go to www.whistlingwhiletheywork.edu.au or download this information sheet.

The survey is for any organisation with more than 10 employees, based or with significant operations in Australia or New Zealand.

It will take most organisations approximately 20-30 minutes to complete.

Only one response should be completed for each organisation, on behalf of the organisation. The survey should therefore be completed by a senior manager with sufficient authority, and knowledge of your organisation's processes and procedures.

The survey also enables you to register your organisation's interest in participating in the next major phase of the research project: *Integrity@WERQ*.

Please Note:

- Your organisation's response will be kept strictly confidential to the research team
- Your organisation will not be identifiable in any results, reports or publications (unless with your consent)
- All data will be stored securely in accordance with ethical guidelines
- Participation is voluntary
- Commencing the survey constitutes agreement to participate.

Thank you for participating in this important research.

Contents

The survey has five sections:

A — Organisation and respondent details

B — Processes relating to wrongdoing concerns

C — Staff protection, support and management

D — Formal procedures, awareness and training

E — Interest in further participation

| | |
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| A | SECTION A: ORGANISATION AND RESPONDENT DETAILS |
| 1 | Please complete the following: |
| 1a | Organisation name |
| 1b | Postal address |
| 1c | Organisation website |
| 1d | Name of person completing this survey on behalf of organisation |
| 2 | Position of respondent completing the survey on behalf of the organisation. <ul style="list-style-type: none"> a. Chief executive officer b. Head, corporate affairs c. Head, human resources d. Head, compliance / regulatory affairs e. Head, internal audit / ethical standards f. Corporate counsel g. Company secretary h. Business owner i. Other (please specify) [free text] |
| 3 | Please complete the following: |
| 3a | Email address |
| 3b | Telephone number(s) including area code |
| 4 | Which of the following best describes your organisation? <ul style="list-style-type: none"> a. Public sector or government entity b. Company or business (for profit) c. Not-for-profit company / business, charity or community organisation d. Other (please specify) [free text] |
| 5(i) | [If a to q4:] What is your organisation's jurisdiction? |

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| | <ul style="list-style-type: none"> a. Australia b. New Zealand c. Jurisdiction other than Australia or New Zealand (please specify) [free text] |
| 5a(i) | <p>[If a to q5:] Which level of government?</p> <ul style="list-style-type: none"> a. Australian (Commonwealth) government b. State or Territory government c. Local government d. Other (please specify) [free text] |
| 5b | <p>[If b or c to q5:] Indicate your organisation's state or territory:</p> <ul style="list-style-type: none"> a. Australian Capital Territory b. New South Wales c. Northern Territory d. Queensland e. South Australia f. Tasmania g. Western Australia h. Victoria i. Other (please specify) [free text] |
| 5c | <p>[If a to q5:] Which of the following best describes your entity?</p> <ul style="list-style-type: none"> a. Government department b. Statutory authority c. Government-owned corporation (GOC) or government business enterprise d. University or independent publicly owned education provider e. Parliamentary officer or independent integrity agency f. Court or independent tribunal g. Elected local government h. Other (please specify) [free text] |
| 5a(ii)) | <p>[If b to q5 (NZ):] Which of the following best describes your entity?</p> <ul style="list-style-type: none"> a. Central government agency b. Public service department or ministry c. State service agency d. District Health Board e. Local government entity f. Government-owned corporation (GOC) or government business enterprise g. University or independent publicly owned education provider h. Parliamentary officer or independent integrity agency i. Court or independent tribunal j. Other (please specify) [free text] |
| 5(ii) | <p>[If b or c to q4:] Where is your organisation's registered / head office located?</p> |

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| | <ul style="list-style-type: none"> a. Australia b. New Zealand c. Other (please specify) [free text] |
| 6 | <p>[If b or c to q4, or c or d to q5c, or f or g to q5a(ii):] In which jurisdictions does your organisation operate? Select as many as apply:</p> <ul style="list-style-type: none"> a. Australian Capital Territory b. New South Wales c. Northern Territory d. Queensland e. South Australia f. Tasmania g. Victoria h. Western Australia i. New Zealand j. Jurisdictions other than Australia or New Zealand (please specify) [free text] |
| 7 | <p>How many employees does your organisation have, located in Australia or New Zealand (full-time equivalents or FTE)?</p> <ul style="list-style-type: none"> a. 10 or fewer b. 11 to 100 c. 101 to 500 d. 501 to 1,000 e. 1,001 to 5,000 f. 5,001 to 20,000 g. More than 20,000 h. Other (please specify) [free text] |
| 7a | <p>[If j to q6] How many employees does your organisation have, located <i>outside</i> Australia or New Zealand (full-time equivalents or FTE)?</p> <ul style="list-style-type: none"> a. 10 or fewer b. 11 to 100 c. 101 to 500 d. 501 to 1,000 e. 1,001 to 5,000 f. 5,001 to 20,000 g. More than 20,000 h. Other (please specify) [free text] |
| 8 | <p>Which is the main industry or policy sector that your organisation is involved in?</p> <ul style="list-style-type: none"> a. Agriculture, forestry, fishing b. Mining c. Manufacturing d. Electricity, gas, water and waste services e. Construction f. Wholesale trade g. Retail trade h. Accommodation, food services i. Transport, postal and warehousing j. Information, media and telecommunications k. Financial and insurance services (including banking) l. Rental, hiring and real estate services m. Professional, scientific and technical services (including legal) n. Administrative and support services |

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| | <ul style="list-style-type: none"> o. Public administration and safety (including police, emergency services, security) p. Education and training q. Health care and social assistance r. Arts and recreation services s. Other (please specify) [free text] |
| B | SECTION B: PROCESSES RELATING TO WRONGDOING CONCERNS |
| | <p>Many organisations have processes for responding to concerns from staff, including employees and other organisation members, about possible wrongdoing in or by the organisation.</p> <p>For the purposes of this survey, wrongdoing concerns are staff concerns, allegations or reports about matters such as suspected fraud or theft, corruption, conflicts of interest, waste, improper or negligent decision-making, abuse or mistreatment of clients, customers or the public, or dangers to public health, safety or the environment.</p> <p>While staff may also raise personal or workplace grievances (e.g. bullying, workplace health or safety breaches, unfair personnel practices), most questions in this survey are about wider wrongdoing concerns, affecting more than just the personal interests of individual staff, like those listed above.</p> <p>Wrongdoing concerns may be about conduct by individuals, groups of staff, managers or the organisation as a whole.</p> |
| 9 | <p>Some organisations have one process for responding to all types of staff concerns. Others have separate processes for responding to workplace grievances on the one hand, and for responding to wider wrongdoing concerns such as suspected fraud, theft, corruption, negligence or dangers to public health or safety, on the other hand.</p> <p>Which best describes your organisation's approach? [Choice: 1 only]</p> <ul style="list-style-type: none"> a. We only have a process for responding to workplace grievances b. We use our workplace grievance process to respond to all wrongdoing concerns c. We have different processes for responding to workplace grievances, and for responding to wider wrongdoing concerns d. Other (please specify) [free text] |
| 10 | <p>Does your organisation encourage or require staff to report concerns about the following types of wrongdoing? Select as many as apply, or indicate if they are not applicable to your organisation.</p> <p>[Choices: Yes, identified as something staff can or should report / No, not identified / Not applicable]</p> <ul style="list-style-type: none"> a. Fraud or theft b. Corruption (including bribery or favouritism) c. Conflicts of interest d. Waste or mismanagement of resources e. Defective, negligent or improper decisions (including unrectified mistakes) f. Misuse of information, including unauthorised access or release g. Abuse or mistreatment of clients, customers or the public h. Dangers to public health, safety or the environment, including unsafe products or services |

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| | <p>i. Perverting justice or accountability (including covering up other wrongdoing)</p> <p>j. Other types of wrongdoing (but not including workplace grievances - we will ask you about these later)</p> |
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| 14 | <p>With whom are staff and others in your organisation allowed to raise wrongdoing concerns? Select as many as apply. [Choices: Yes / No / Unsure or information not available / Not applicable]</p> <ul style="list-style-type: none"> a. Their direct supervisor / manager b. Senior management / CEO c. Specific managers nominated for this purpose d. Whichever manager(s) they trust e. Selected specialist staff (e.g. internal audit, fraud control, ethical standards, human resources, grievance officers, public interest disclosure coordinator) f. The board or audit committee g. An external hotline company (e.g. contracted by the organisation) h. An independent advice line (e.g. run by a public interest group) i. External ombudsmen, public integrity or regulatory agencies (if necessary) j. Unions, professional associations, industry bodies or other external organisations (if necessary) k. The media / journalists (if necessary) <p>Is there anyone else with whom staff in your organisation are allowed to raise wrongdoing concerns? [Choice: Yes (please specify)] [free text]</p> |
| 15 | <p>How does your organisation record and/or track wrongdoing concerns (whether identified by staff or other means such as audits or system controls)? Our organisation: [Choice: 1 only]</p> <ul style="list-style-type: none"> a. Has a system where every supervisor or manager records an issue when it is brought to them b. Has a system where only selected specialist staff record and track the issue (e.g. internal audit, fraud control, ethical standards, human resources, grievance officers, public interest disclosure coordinator) c. Has no particular system for recording and tracking issues, but does so as needed if issues arise d. Does not record or track wrongdoing issues e. Other (please specify) [free text] |
| 16 | <p>Does your organisation have processes for the following? Select as many as apply</p> <ul style="list-style-type: none"> a. Assessing concerns to ensure they are dealt with by the most appropriate people in the organisation b. Coordinating the responses to concerns, where different aspects are being dealt with by different people c. Ensuring appropriate investigations or management actions are undertaken in response to concerns d. Documenting actions and outcomes, including any changes or improvements made as a result of staff concerns e. Referring concerns or reports to independent integrity or regulatory agencies where necessary, or liaising with them on how concerns should be handled f. Seeking external professional assistance for investigating or managing wrongdoing concerns g. No, our organisation has none of these processes for dealing with wrongdoing concerns h. Other (please identify any other key processes for dealing with wrongdoing concerns in your organisation) [free text]. |

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| C | SECTION C: STAFF PROTECTION, SUPPORT AND MANAGEMENT |
| 17 | <p>Does your organisation provide staff with advice on their rights and responsibilities if they raise wrongdoing concerns, or if concerns are raised involving them? (For example, advice about confidentiality, due process, natural justice, and sanctions against false or misleading reports).</p> <p>Our organisation: [Choice: 1 only]</p> <ul style="list-style-type: none"> a. Provides this kind of advice as a matter of routine to all staff (e.g. in general procedures, training or induction) b. Provides this kind of advice to any staff who raise concerns, or against whom concerns are raised c. Does not currently provide this kind of advice d. Other (please specify) [free text] |
| 18 | <p>When staff raise wrongdoing concerns, does your organisation assess the risks of any detrimental impacts they may experience? (For example, stress, workplace conflict, reprisals or other repercussions).</p> <p>Our organisation: [Choice: 1 only]</p> <ul style="list-style-type: none"> a. Starts assessing the risks against any staff member as soon as they raise a concern b. Assesses the risks if and when any actual conflicts or problems begin to arise c. Does not currently have a process for assessing the risks d. Other (please specify) [free text] |
| 18a | <p>[If a or b to q18]:</p> <p>Is this risk assessment documented? [Choice: 1 only]</p> |
| | <ul style="list-style-type: none"> a. Always b. Usually c. Sometimes d. Rarely or never e. Unsure / information not available f. Other (please specify) [free text] |
| 19 | <p>Who is responsible for addressing any problems, stress, conflicts or reprisals that might arise for a staff member who has raised wrongdoing concerns? Select as many as apply [but if g chosen no others allowed]</p> <ul style="list-style-type: none"> a. CEO b. All managers c. The direct manager(s) of the staff member who raised the concern d. Internal investigation staff (e.g. internal audit, fraud control, ethical standards) e. Whistleblower support unit (if applicable) f. Other corporate governance staff (e.g., human resources, grievance officers, company secretary, corporate counsel, public interest disclosure coordinator) g. No one currently has direct responsibility for this h. Other (please specify) [free text] |
| 20 | <p>How does your organisation manage issues of confidentiality when staff raise wrongdoing concerns? Select as many as apply. [But if e chosen no others</p> |

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| | <p>allowed]</p> <p>Our organisation has processes for:</p> <ul style="list-style-type: none"> a. Keeping the identity of staff who raise concerns as confidential as possible b. Consulting with staff about any action that could identify them, including to external agencies c. Maintaining the confidentiality of any persons against whom concerns have been raised d. Helping managers and staff deal with situations where confidentiality is impossible or unlikely to be maintained e. No, our organisation does not have any the above processes for managing issues of confidentiality f. Other (please specify) [free text] |
| 21 | <p>Does your organisation have a strategy, or program, for delivering support and protection to staff who raise concerns about wrongdoing?</p> <p>Our organisation: [Choice: 1 only]</p> <ul style="list-style-type: none"> a. Has a standing support program, available to all staff at any time b. Has a process for setting up a support strategy as needed for individual staff, if any issues arise c. Does not currently have any specific strategy, program or process d. Other (please specify) [free text] |
| 22 | <p>What types of support are available for staff who raise wrongdoing concerns in your organisation? Select as many as apply. [But if I no others allowed].</p> <ul style="list-style-type: none"> a. Advice and information on how the organisation will respond b. Progress reports on the response c. Advice about outcomes, including any actions taken, benefits or changes made d. Access to a management-designated support person inside the organisation e. Access to professional stress management, counselling or legal services f. Access to external employee support services (e.g. Employee Assistance Programs) g. Support from external public integrity or regulatory agencies h. Management intervention in workplace problems, if required i. Physical protection or relocation, if required j. Formal acknowledgement of service, including thanks and congratulations, where appropriate k. Rewards or other incentives l. No particular types of support m. Other (please specify) [free text] |

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| 23 | <p>Where staff experience issues (e.g. reprisals, workplace conflicts, stress or other detrimental impacts) after raising wrongdoing concerns, what processes does your organisation have for seeking a resolution? Select as many as apply. [But if g no others allowed]</p> <ul style="list-style-type: none"> a. Mechanisms for ensuring adequate compensation or restitution b. Agreed alternative employment arrangements c. Management intervention to stop the problems d. Disciplinary action against persons responsible for the problems e. A process for managers or the organisation to apologise f. Follow-up processes for ensuring the staff member's longer term welfare g. No particular processes for seeking a resolution h. Other processes for seeking a resolution (please specify) [free text] |
| D | <p>SECTION D: FORMAL PROCEDURES, AWARENESS AND TRAINING</p> |
| 24 | <p>So far, the questions above have asked about your organisation's processes and practices in general, including informal ones. Does your organisation also have formal, written procedures or policies which set out these processes (e.g., internal reporting procedures, formal whistleblowing policy)?</p> <ul style="list-style-type: none"> a. Yes <i>Please provide a reference (e.g. titles and dates of the main policies or procedures, and / or a website or intranet location / url)</i> [free text] b. No |
| 25 | <p>How are staff made aware of your organisation's processes for responding to wrongdoing concerns? Select as many as apply. [But if m chosen no others allowed]</p> <ul style="list-style-type: none"> a. A code of conduct b. A published list of organisational policies or procedures c. Access to procedures on our website / intranet site d. Information at induction / recruitment e. Information in position descriptions or employment contracts f. General staff or manager training g. Specific training about wrongdoing concerns for staff or managers h. Regular team and management meetings i. Internal newsletters, bulletins, posters and/or all-staff emails j. General statements by the CEO or directors to all staff k. Individual personal communication by the CEO with all staff l. Statements and advice from each manager to their own staff m. None of the above n. Other (please specify) [free text] |
| 26 | <p>Which staff in your organisation receive specialised training in relation to receiving and managing wrongdoing concerns, including training about staff support? Select as many as apply. [But if e then no others allowed]</p> <ul style="list-style-type: none"> a. All staff b. Everyone in a supervisory or management role c. Selected managers d. Selected specialist staff (e.g. internal audit, fraud control, ethical standards, human resources, grievance officers, public interest disclosure coordinator) e. No staff currently receive specialised training in relation to this f. Other (please specify) [free text] |

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| 27 | <p>Have your organisation's processes and procedures for responding to wrongdoing concerns been evaluated or reviewed, in the last five years? [Choice: 1 only]</p> <ul style="list-style-type: none"> a. Yes, evaluated (e.g. benchmarked, assessed for effectiveness) b. Yes, reviewed (e.g. updated to reflect new standards or requirements) c. No, neither evaluated nor reviewed d. Unsure / unknown |
| 27a | <p>[If a to q27:] What type of evaluation did you conduct? Select as many as apply.</p> <p>The evaluation of our organisation's processes and procedures:]</p> <ul style="list-style-type: none"> a. Was conducted by independent experts or consultants b. Included engagement with staff c. Included engagement with relevant external stakeholders (e.g. unions, professional organisations, public interest groups, integrity and regulatory agencies) d. Was reported to the CEO, audit committee, board or external stakeholders e. None of the above f. Other (please specify) [free text] |
| 28 | <p>We are also interested in your processes for responding to personal and workplace grievances. Does your organisation encourage or require staff to report concerns about the following types of grievance? Select as many as apply, or indicate if they are not applicable to your organisation. [Choices: Yes, identified as something staff can or should report / No, not identified / Not applicable]</p> <ul style="list-style-type: none"> a. Unfair personnel practices b. Workplace health or safety breaches c. Bullying d. Workplace discrimination or harassment <p>Are there other types of personal or workplace grievance that staff are encouraged or required to report? Choice: Yes (please specify) [free text]</p> |
| 28a | <p>[If c to q9:] Please compare your organisation's processes for responding to workplace grievances, with the processes that you have outlined earlier for responding to wider wrongdoing concerns. Which of the following statements best describes your organisation's approach? [Choice: 1 only]</p> <ul style="list-style-type: none"> a. Our organisation's workplace grievance processes are more comprehensive than our processes for responding to wider wrongdoing concerns b. Our organisation's workplace grievance processes are less comprehensive than our processes for responding to wider wrongdoing concerns c. The processes are different but equally comprehensive |

| E | SECTION E: INTEREST IN FURTHER PARTICIPATION |
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| | <p>Your organisation is invited to participate in the next major component of this research, called <i>Integrity@WERQ</i>.</p> <p>Integrity@WERQ involves a confidential survey of your employees and managers, called the Workplace Experiences and Relationships Questionnaire (WERQ); as well as collection of further data about your organisation's processes and procedures for responding to wrongdoing concerns.</p> <p>This phase examines the nature and performance of processes for facilitating and managing the reporting of wrongdoing in more depth, by collecting data on issues including:</p> <ul style="list-style-type: none"> • Staff confidence in reporting processes • Whether there are staff who perceive wrongdoing but are not speaking up • How well current reporting and support processes are working • What factors can help equip managers to ensure the best outcomes for the organisation and staff. <p>Results will include:</p> <ul style="list-style-type: none"> • Information for your organisation to benchmark itself against others in your jurisdiction or sector, using indicators of the quality and performance of your organisation's processes • A new picture of the challenges and options across organisations for managing reporting, with lessons for best practice in all sectors • New data on which organisational responses work and which don't, for use by governments who are currently considering law reform in this area • Capability for organisations to monitor their progress over time and evaluate the effects of new or changed policies into the future. |
| 29 | <p>Is your organisation interested in participating in <i>Integrity@WERQ</i>?</p> <p>a. Yes, we would like to participate. b. We are possibly interested and would like more information. c. No.</p> <p>[If a or b, further questions on participation follow. If c to q29, go to q34]</p> |
| 34 | <p>Finally, do you have any further comments or information you would like to give about your organisation's processes and procedures for facilitating and managing internal reporting of wrongdoing?</p> <p>[free text]</p> |
| 35 | <p>This ends the survey. Thankyou again for contributing to this important research.</p> <p>To retain a copy of your organisation's response to this survey, an email containing your responses can be sent to the email address indicated at the beginning of the survey.</p> <p>Would you like an email of your responses?</p> <p>[Choices: Yes / No]</p> |

