



LUND UNIVERSITY
School of Economics and Management

Adopting a whistleblowing system

A study on the use and design in Swedish municipalities

by

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May 2018

Master's Programme in Accounting and Finance

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Abstract

Title:	Adopting a whistleblowing system: A study on the use and design in Swedish municipalities
Seminar date:	30 June 2018
Course:	BUSN79 - Degree Project in Accounting and Finance
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Keywords:	Whistleblowing, municipalities, misconduct, public sector, internal control
Purpose:	The purpose of the study is to investigate how and why the municipalities in Sweden are using whistleblowing systems.
Theoretical framework:	The theoretical framework is based on the institutional context of Swedish municipalities, previous research on whistleblowing and the different factors that affect the adoption of a whistleblowing system.
Methodology:	A quantitative study was conducted through a questionnaire which was sent out to public managers in all Swedish municipalities.
Conclusion:	The adoption of whistleblowing systems in Swedish municipalities is still in the early phase with the majority still not using it. It is not considered a fashion in Swedish municipalities yet, however the adoption is increasing. The whistleblowing systems in the adopting municipalities are internal, mainly focused on the employees and covers a wide range of events. The adoption is a political decision and has happened within the last five years. Adopters tend to be large municipalities that value legitimacy high. A whistleblowing system seem to be adopted mostly for its' symbolic value and not to increase effectiveness. The relevance of the received reports is low, however, adopters are satisfied. Available resources is also a factor that might affect the adoption. Non-adopters believe that the guidelines and routines in place today are sufficient.

Acknowledgements

We would like to thank all our respondents for taking their time to participate and providing us with valuable contributions. Without them, this study would not have been possible. Moreover, we would like to thank our supervisor Johan Dergård for his valuable comments and feedback during the writing process.

Lund 2018-05-25

Madeleine Anarp and Johanna Egertz

Table of contents

1. Introduction	1
1.1 Outline of the thesis	3
2. Theoretical framework	4
2.1 Institutional context of municipalities	4
2.2 Previous research on whistleblowing	5
2.3 Reasons behind an adoption of a whistleblowing system	7
3. Methodology	13
3.1 Research approach and design	13
3.2 Data collection	13
3.3 Measurement of the factors	16
3.4 Data analysis	19
4. Results	20
4.1 General results	20
4.2 Design of whistleblowing system - adopters	20
4.3 Channels, guidelines and routines - non-adopters	25
4.4 Factors	26
5. Discussion	34
6. Conclusion	39
6.1 Contributions	39
6.2 Limitations	40
6.3 Future research	41
References	42
Appendix I	47
Appendix II	59

List of tables

Table 1 - Non-response	15
Table 2 - Groups of municipalities.....	16
Table 3 - Use of whistleblowing system	20
Table 4 - Idea.....	21
Table 5 - Individuals covered.....	21
Table 6 - Communication channels.....	22
Table 7 - Events covered.....	22
Table 8 - Reporting channels	23
Table 9 - Receiver of the reports	23
Table 10 - Received reports	24
Table 11 - Other channels used	25
Table 12 - Size of the municipalities.....	27
Table 13 - Comparison size.....	27
Table 14 - Comparison legitimacy	28
Table 15 - Cost vs. benefits related to size.....	29
Table 16 - Comparison cost and tax income	29
Table 17 - Previous events	30
Table 18 - Comparison previous events	31
Table 19 - Political power	31
Table 20 - External influence - adopters	32
Table 21 - External influence - non-adopters.....	32
Table 22 - Comparison legal consequences	32
Table 23 - Comparison uncontrollable whistleblowing	33

1. Introduction

From Edward Snowden to the me-too movement, the phenomenon of whistleblowing seems more relevant than ever. Corporate scandals throughout the years have increased the awareness in the society of the topic and whistleblowing systems are therefore a hot topic for management control. The increased awareness of whistleblowing can be seen as a symptom of the global trend of transparency and openness which has grown stronger during the last years. With technology continually advancing, information is easily accessible for everyone, making it easier for stakeholders to hold organizations accountable for their activities. There is an increased demand for ethical business practices and, according to Pittroff (2014), society seem to demand procedures that facilitate whistleblowing in organizations. Thus, a whistleblowing system can work as a valuable complement to other internal control functions to prevent misconduct (Herschl, 2016).

In municipalities, who are responsible for using the taxpayer's money efficiently, having well-functioning internal controls to detect misconduct is critical. Besides from organizational members and organizational goals, misconduct of economic character in municipalities also harms *“innocent third parties who depend on the welfare services from the municipality”* (Skivenes & Trygstad, 2016, p. 265). Thus, municipalities experience higher pressure from the society than other organizations do (Branco & Rodrigues, 2006). However, municipalities seem to have problems gaining trust from the society. As many as three out of four citizens in Sweden believe that politicians in the municipalities are corrupt (Transparency International Sverige, 2016). Events such as the scandal in Gothenburg where managers took bribes and were careless with the public funds may have influenced that perception. In the year 2011, as an aftermath of the scandal, Gothenburg became the first municipality in Sweden to implement a whistleblowing system (SOU 2014:31). Since then, several municipalities have followed their lead which indicates that whistleblowing systems can provide benefits for these types of organizations.

Research has shown that a whistleblowing system is important for promoting democracy, organizational learning and development and it may increase organizational efficiency. It can also improve the welfare of the citizens and employees in the municipality (Skivenes &

Trygstad, 2016). Moreover, it is valuable to municipalities as it can help prevent bad behaviors that provide obstacles and damage resources. Thus, a whistleblowing system can be a complement to other control systems used in municipalities as it may capture misconduct that would otherwise go unnoticed. For example, fraud is often detected by people within the organization (PwC, 2018), thus, it is important that people with insight in the organization have the opportunity to report. A whistleblowing system can also help municipalities to legitimize their activities (Pittroff, 2014), which is essential for public sector organizations who face much external pressure to do the right things. Thus, there are several potential benefits that might influence municipalities' choice to adopt a whistleblowing system.

Whistleblowing research have mainly focused on an international context and studies of the Swedish public sector is scarce (Hedin & Månsson, 2012). The context of Swedish municipalities is unique, with high transparency and special laws, such as the principle of public access to official records (offentlighetsprincipen) and the principle of confidentiality of sources (meddelarfrihet) (Justitiedepartementet, 2015). The special context might have implications for the design of whistleblowing systems, making it especially interesting to study. Further, to combat misconduct is important in the public sector and municipalities need the best tools to achieve this. Therefore, more research on different control functions, where whistleblowing systems is a part, can provide valuable insights for the Swedish municipalities. The current research gap may be a result of that whistleblowing systems are a relatively new phenomenon.

In order to reduce the current research gap, the aim of this study is to investigate how and why municipalities in Sweden are adopting whistleblowing systems. First of all, it must be determined to what extent whistleblowing systems are used since the phenomenon is relatively new. Next, it is of interest to see how whistleblowing systems are used when adopted. Finally, the unique context of municipalities makes the reasons behind the decision to adopt or not adopt interesting to study. Thus, to fulfill the aim, three research questions will be used to guide the study.

1. How widespread is the use of whistleblowing systems in Swedish municipalities?
2. How have the adopting municipalities designed their whistleblowing systems?
3. Why have the municipalities chosen to adopt or not adopt whistleblowing systems?

1.1 Outline of the thesis

The *introduction* chapter aims at providing the reader with an initial understanding of the state of the art of whistleblowing systems today, followed by a problem discussion why it is interesting to study the adoption of whistleblowing systems in the Swedish public sector. The chapter ends with the research aim and the three research questions.

The *theoretical framework* begins with a description of the unique context which municipalities operate in, which may have an influence on the use and design of whistleblowing systems. Further, previous research in the field of whistleblowing is presented. Lastly, eight factors which are used to explain why municipalities choose to adopt a whistleblowing system are presented.

The *methodology* chapter starts off with explaining the research design and approach to make the reader understand the methodological decisions made during the study. How the data was collected through a questionnaire is described in detail as well as a discussion concerning limitations with using questionnaires. The chapter ends with an explanation of how the factors were measured.

The *result* chapter relates the answers from the questionnaire to the theoretical concepts of whistleblowing systems. The data is mainly presented in tables to make it easy to interpret. The answers concerning design of whistleblowing systems is categorized into themes, followed by a section on other guidelines and routines used by non-adopters. Finally, the results relating to the factors are discussed and compared.

In the *discussion* chapter, the results are further related to the theoretical concepts and discussed in a broader context, for example what implications the results have for municipalities.

Finally, the *conclusion* chapter starts with a conclusion in which the most prominent findings are presented for each research question. It is followed by contributions from the study, limitations and suggestions for future research.

2. Theoretical framework

2.1 Institutional context of municipalities

The special context in which municipalities operate might mean that the use and design of whistleblowing systems differs from private sector organizations. The characteristics presented below are the same for all municipalities. They are likely to have a similar impact and are thus not expected to create differences between municipalities concerning the choice to adopt or not adopt a whistleblowing system.

General characteristics

Municipalities are large organizations with many employees and they tend to have well-educated staff. Further, they are run by elected politicians together with administrative staff (Ramberg, 2018). All major decisions must be made in the city council where the citizens are represented by the politicians (Sveriges Kommuner och Landsting, 2018). Municipalities in Sweden have historically had a lot of autonomy from the central government where, for instance, they have the right to levy tax on income. There are also strict rules on public procurement that will influence the decision-making process in the municipalities (Ramberg, 2018).

Legal implications

In the year of 2017, a new law was introduced in Sweden that aims at protecting whistleblowers from retaliation. The law protects employees that report serious misconduct internally, externally or to his/her labor organization (SFS 2016:749). Another central law to consider in relation to whistleblowing systems is the principle of public access to official records (offentlighetsprincipen). The law states that when a document is sent in to a local government, it must be registered and kept in the archives, including the name of the sender. When in the archive, anyone has the right to retrieve it and view it (Justitiedepartementet, 2015). Thus, it can have implications for how the whistleblowing systems will be designed in municipalities. The aspect of anonymity must be considered. When reporting to the media, the identity of the whistleblower cannot be revealed, as relayed in the principle of confidentiality of sources (meddelarfrihet). Moreover, the employees in the public sector have a statutory right to raise their voice when they are concerned about misconduct (Justitiedepartementet, 2015).

Transparency

Transparency is the rule within municipalities in Sweden (Bergström, Magnusson & Ramberg, 2008), which is fundamental for democracy (Johnsen, 1999). The municipalities must have a high level of openness and are required to respond to the various stakeholders concerns regarding possible misconduct (Sveriges Kommuner och Landsting, 2012a). Since the municipalities face much external scrutiny, whistleblowing systems can be one way for them to respond to external pressure of openness and transparency.

Organizational structure

Chenhall (2003) mentions the organizational structure as one factor that can influence the design of management control systems and thus the decision to adopt a whistleblowing system. The municipalities all have the same organizational structure, as it is controlled by the law (SFS 2017:725). The law states which parts of the organizations that should be included, what function they have and how decisions are made. Moreover, the structure and responsibility can be seen as decentralized (Ramberg, 2018). Even though there might be small differences, the organizational structure will mostly be the same for all municipalities and will thus not be a reason for differences regarding adoption of whistleblowing systems in this context.

2.2 Previous research on whistleblowing

Whistleblowing is defined as a: “[..] disclosure by organisation members (former or current) of illegal, immoral or illegitimate practices under the control of their employers to persons or organisations that may be able to effect action” (Near & Miceli, 1985 p. 4). It is important to note that the phrase “disclosure” mean that it is more than just a general complaint (Hedin & Månsson, 2012). Whistleblowing can be made to either an internal or external source (Culiberg & Mihelic, 2017) and can cover misconduct such as discrimination, harassment, conflict of interest and misconduct of economic character, for example fraud and bribes (Statskontoret, 2016).

Previous research in the field of whistleblowing have mainly focused on the whistleblower itself, for example the background to why some people chose to report, which characteristics a whistleblower possesses and what retaliation they experience after reporting misconduct. Some argue that there is a risk of whistleblowing systems being abused by dissatisfied employees,

however research has shown that whistleblowers actually tend to be productive, committed and valued members in the organization (Brewer & Coleman Selden, 1998). In terms of retaliation, Fredin (2012) mentions that fear of retaliation is the number one reason why people do not blow the whistle. In Sweden, up to 30% of the citizens refrain from reporting due to the risk of negative retaliation (Transparency International Sverige, 2016) and half of the whistleblowers in the public sector left their job due to experienced retaliation (Hedin & Månsson, 2012). It is important to note that the retaliation took place before the new law protecting whistleblowers against retaliation (SFS: 2016:749) was put into place, so the conditions might have changed. However, in the society, whistleblowers are usually portrayed as heroes in the media (Miceli & Near in Giacalone & Greenberg, 1997). Even though much research had been conducted on the individual perspective of the whistleblower, it is not of interest for the aim of this study. Instead, an institutional perspective will be applied when studying how and why municipalities adopt a whistleblowing system.

One of the reasons to why organizations choose to adopt a whistleblowing system is to respond to the demands and expectations of the society (Pittroff, 2014). The society set up boundaries and norms within which organizations seek to operate. The society also expect organizations to fulfil their expectations (Branco & Rodrigues, 2006), which means that the society and organizations are linked together by a social contract (Brown & Deegan, 1998). Pittroff (2014) argues that a whistleblowing system can be positive in terms of how the society perceives the organization's behavior, especially in terms of creating acceptance and legitimacy. These theories are in accordance with the case of municipalities since they experience high pressure from citizens (Branco & Rodrigues, 2006) and must have a high level of transparency (Bergström, Magnusson & Ramberg, 2008). Due to that, the demand for whistleblowing systems may be high in this sector in order to not break the social contract municipalities have with the citizens.

Further, the signaling value of the whistleblowing system is of importance, according to the legitimacy theory (Pittroff, 2014), where a whistleblowing system can, as mentioned, signal to stakeholders that the organization fulfils the expectations of the society. How effectively the system is in actually preventing misconduct is, however, of less importance for the society. Whenever legitimacy is gained, it is critical for organizations to maintain it. To build up legitimacy after an unforeseen crisis is difficult (Pittroff, 2014), which further points out the

importance of organizations to have whistleblowing systems to detect fraud before problems goes public. However, it is unclear if this applies to municipalities, as they operate in a different context than private companies and thus have special laws and demands to comply with.

A proper internal whistleblowing system can have several benefits for an organization. Whistleblowing systems are a part of an organization's internal control environment, which implies that designing it adequately is important to ensure effective internal controls (Hooks, Kaplan & Schultz, 1994). There have been discussions regarding if the whistleblowing system should be in-house or outsourced, where it is more common for public sector organizations to have it in-house (Vandekerckhove & Lewis, 2012). When an internal reporting system is in place, the organization signals to potential whistleblowers and perpetrators that they are serious about preventing misconduct (Liyanarachchi & Newdick, 2009). Setting the right tone at the top is also something that Fredin (2012) argues to be important to encourage whistleblowers to report on misconduct, which may enhance employees' attitude towards the organization (Miceli, Near & Dworkin, 2009). A whistleblowing system also encourages internal reporting, which may prevent external reporting if individuals feel that their reports are taken seriously (Tavakolian, 1994). By that, the organization can avoid the high costs often associated with external whistleblowing (Pittroff, 2014). Finally, when problems are corrected within the organization, legislators will not get involved and restrict behaviors. Thus, an effective internal whistleblowing system can be profitable for organizations in the long run (Miceli, Near & Dworkin, 2009).

2.3 Reasons behind an adoption of a whistleblowing system

According to Sturdy (2004), there are several perspectives to why organizations choose to adopt new management ideas and practices, which is the case when adopting a whistleblowing system. The rational view means that a management practice will be adopted because it provides some sort of objective benefits. However, it may also be adopted based on emotional concerns, such as a perceived need from the management or due to the rhetorical value that it represents. Further, when adopting a management practice for institutional reasons, the organization tries to secure legitimacy rather than gaining specific outcomes such as increased efficiency. Thus, it may be adopted due to its' symbolic value. Abrahamson (1991) argues when fashions are adopted due to its symbolic value, they in fact provide small benefits for organizational

performance. All the different perspectives can be reduced to specific factors (Sturdy, 2004), which in this study will be used to determine how and why municipalities adopt a whistleblowing system. Previously the institutional context of the municipalities has been discussed, such as the laws they must comply with and how the organizations are structured. To answer the third research question, the factors of interest are the ones that will create variances within the context of municipalities.

Size

When an organization becomes larger, there is an increased need for the managers to institute more controls in order for them to capture the information (Chenhall, 2003). The larger an organization is, the harder it also gets to exercise direct control. Therefore, large organizations are more inclined to adopt a whistleblowing system (Lee & Fargher, 2013). When Statskontoret (2016) conducted a survey, mapping how the administrative authorities working under the central government used whistleblowing systems, they found that it was more common within the larger administrative authorities. Further, Pittroff (2014) agrees that large organizations are more likely than small ones to implement whistleblowing systems and adds onto reasons for this. Large organizations are more visible and must to a higher extent make sure that their activities are legitimate, which corresponds well with the arguments by Branco and Rodrigues (2006) concerning social pressure. These organizations must also to a higher extent respond to the demands of the society regarding using whistleblowing systems compared to small organizations. An implementation for large organizations is also less costly than for smaller organizations, since they can benefit from economies of scale (Pittroff, 2014) and usually have more resources available (Lee & Fargher, 2013). Larger organizations are therefore more likely to see that benefits from the whistleblowing system outweighs the costs, which may be a problem for small organizations (Pittroff, 2014). Thus, the size of the organization seems to be a crucial contingent factor to consider when studying differences in the adoption of whistleblowing systems.

Legitimacy

As seen in the review of previous research, it is important for an organization to gain legitimacy from the society and stakeholders. Pittroff (2014) explains that increasing legitimacy is the main reason why organizations choose to adopt a whistleblowing system. An adoption can help to minimize the legitimacy gap that arises if the organization acts outside the boundaries and

norms that are set up by the society (Pittroff, 2014). Scandals that have gained much attention can be expected to increase the demand from the society for organizations to facilitate whistleblowing. Further, Pittroff (2014) found that the whistleblowing system was only used as a form of signaling, and the effectiveness of the system was not as important as showing the correct behavior towards the society. Statskontoret (2016) found that increasing the openness and public's trust were two of the reasons behind the adoption of a whistleblowing system in administrative authorities. Since the administrative authorities are a part of the public sector, those reasons may be relevant for adopting a whistleblowing system in municipalities as well. Thus, it can be expected that the factor of legitimacy will affect the decision to adopt a whistleblowing system.

Cost

Johansson and Siverbo (2009) included a financial explanation in their study of the use of relative performance evaluation in municipalities and the perspective can be applied to the use of whistleblowing systems as well. They mention that public organizations are not exposed to bankruptcy and loss of business like private organizations, instead they are exposed to external pressure regarding waste of resources (Johansson & Siverbo, 2009). Therefore, the municipalities must consider the financial benefits of adopting a whistleblowing system, even though the financial output often is unclear. Keil, Tiwana, Sainsbury and Sneha (2010) used a benefit-to-cost differential to investigate whistleblowing intentions on the individual perspective. The benefit-to-cost differential is the net difference between the expected benefits and perceived costs of whistleblowing, which can be applied on an organizational perspective as well. The cost for an organization can, for example, be related to the implementation and upkeep of a system, or the cost to an external party if the system is outsourced. The benefits can, for example, be related to corrections of wrongdoing and increased organizational learning. Fraud and corruption are costly behaviors that can provide hurdles for economic development in organizations (International Finance Corporation, n.d.) and correcting them thus minimizes the negative effects (Skivenes & Trygstad, 2016). However, if the perception is that the cost of the whistleblowing system outweighs the benefits, an organization might choose not to implement a whistleblowing system. This has been concluded in studies conducted on private listed organizations in both Germany (Pittroff, 2014), and in the U.S. (Lee & Fargher, 2013). It is therefore of interest to investigate if the cost factor is a reason for not adopting a whistleblowing system in Swedish municipalities, similar to that in Germany and in the U.S. It

can be expected that if the measurable benefits of a whistleblowing system outweigh the perceived cost, a municipality will choose to adopt it.

Previous events

When a scandal occurs, there is increased pressure from the public to adopt mechanisms to prevent future wrongdoings (Watts & Zimmerman, 1986 in Spira & Page, 2003). Learning from failures is a key process for organizations to be able to be robust and reliable and it increases organizational capacity. Organizational learning refers to information and insights that is gained from events or previous experiences that steer the current behavior. The process of learning from failures, such as fraud, includes several mechanisms where the management has a central role of signaling what behaviors are expected in the organization and how things should be done in the future (Carmeli & Sheaffer, 2008). Therefore, previous events of misconduct might have an influence on the decision to adopt a whistleblowing system in an organization. The decision can be seen as a type of double-loop learning, since the organization investigates the causes of the events as well as preventing future events to occur (Carmeli & Sheaffer, 2008). The case of Gothenburg City provides a good example of double-loop learning. The discovery of misconduct in Gothenburg City was the catalyst for implementing a whistleblowing system (SOU 2014:31). The response to previous events might, however, differ in other municipalities. Based on above argumentation, it is expected that the more previous events that a municipality have experienced, the more likely it is that they adopt a whistleblowing system.

Political power explanations

Since larger decisions in municipalities are made by elected politicians in a city council, it is interesting to see if the adoption of a whistleblowing system seem to differ based on political ideology. The factor of politics was inspired by Johansson & Siverbo (2009) who tried to measure if the political ideology in municipalities influenced the use of relative performance evaluation. Other researchers have also tried to see if the political ideology had implications for the use of different systems. For example, Askim, Johnsen and Christophersen (2007) measured if politics had implications on the use of benchmarking in Norway and found that politics matter. Those results are interesting since both benchmarking (Askim, Johnsen & Christophersen, 2007) and whistleblowing systems can be seen as “ideologically neutral”. Still, it is unclear if political ideology has implications for the adoption of whistleblowing systems.

External influence

Which management procedures that are perceived as the best are changing continuously, often rapidly. Fashions are short-lived collective beliefs about the best procedures (Abrahamson, 1996). According to the interorganizational theory, organizations tend to imitate each other in terms of management fashions (e.g. practices). When one or more organizations adopt a fashion, there is an increased likelihood that other organizations adopt the same fashion (Haunschild & Miner, 1997). Early adopters of a fashion, and more specifically their success, increases the pressure on other organizations to adopt the fashion. The more organizations adopting it, the stronger the collective belief grows, and more and more adopters will follow (Zorn, 2017). The reason to why more organizations tend to follow is that when a practice is used by many organizations, the legitimacy of that practice is increased (Haunschild & Miner, 1997). A risk with the created virtuous cycle is that fashions may gain disproportionate attention compared to their true benefit and efficiency (Zorn, 2017).

Politics, which is central to the context of municipalities, is characterized by a lot of interdependence, such as cooperation and collective actions between political parties. Therefore, goals, strategies and decisions of one political actor is to a high extent influenced by other political actors' goals, strategies and decisions (Gilardi, 2010). Therefore, it can be expected that high experienced external influence mean that it is more likely to adopt a whistleblowing system.

Legal consequences

A whistleblowing system may be adopted by an organization as a mean to avoid legal consequences since wrongdoings are solved internally. To adopt a whistleblowing system to benefit from less legal consequences is one of the traditional benefits behind an adoption. The factor is the same as Pittroff (2014) used as a control variable in her study of the private sector. It is unclear if the factor is relevant to municipalities' decision of adopting a whistleblowing system or not, but the factor can be used to make comparisons with the private sector.

Uncontrollable whistleblowing

Another potential reason for organizations to adopt a whistleblowing system is to avoid uncontrollable whistleblowing to external parties and to avoid bad rumors. This because the whistleblowing system may detect events before they reach the public (Pittroff, 2014). This

may be a reason for adoption in the private sector, however, in public organizations, the principle of confidentiality of sources mean that public organizations cannot force employees to use the whistleblowing system. Employees always have the right to report externally and that right cannot be limited by the employer (Statskontoret, 2016). This may provide obstacles for whistleblowing system adoption in municipalities.

3. Methodology

3.1 Research approach and design

A quantitative approach was used for the data collection and analysis. The approach was needed to be able to investigate similarities and differences between the municipalities, thus, the variation of the answers was of central interest. The study was conducted using a cross-sectional design and the data was collected through a questionnaire, found in *appendix I*. Gathering the data through a questionnaire, allows for a larger sample and the data can be quantified, which responds well with the aim of the study. Moreover, a questionnaire is a cheap way to capture respondents who are spread out over a large geographical area (Bryman & Bell, 2015), which is the case with Swedish municipalities. Instead of a survey design, a case design or a comparative design could have been used. Data could have been collected through interviews. However, since an organizational perspective was chosen with the aim to investigate how and why municipalities have adopted a whistleblowing system, a case design would be too limited. The risk when only including few cases is that they are not representative for the whole population. The use of many cases is therefore essential to be able to generalize the results.

3.2 Data collection

The questionnaire was sent out via email to public managers in all 290 municipalities in Sweden. The reason for the choice of respondents was that they are responsible for all the activities in the municipalities and work as a link between the political leaders and the civil servants. They are therefore expected to have knowledge of the municipalities' work with potential whistleblowing systems. Thus, the respondents were not chosen through a random sample (Bryman & Bell, 2015). There are, however, some limitations of using a single respondent to represent a whole organization. They might want to portray themselves and the organization they represent more favorably than others would (Bryman & Bell, 2015). However, only one respondent per municipality was needed to get the relevant data. 77 (85 %) of the respondents were indeed public managers, 6 (7 %) were human resource representatives and the rest were lawyers, chief financial officers and other administrative staff. Thus, in some cases the survey seems to have been forwarded to someone else with knowledge regarding whistleblowing systems. The respondents have worked in the municipality for quite a long time,

the mean was 8.5 years and the median 5 years. However, 7 of the respondents had worked there for less than a year, thus, some of them had issues answering a few of the questions.

Google Forms was used to collect the answers. It was chosen as it fulfils the needs of a clear and easy survey design and the data can be easily transferred to Excel. The survey questions were formulated based on theoretical concepts. The municipalities were divided into different groups based on if they have adopted a whistleblowing system, are planning to adopt one or if they have not adopted one. The background to each question can be found in *appendix II*. Some of the questions were inspired by questions that other researchers have used in questionnaires, primarily from Pittroff (2014) and Statskontoret (2016). It was beneficial to use the same questions since they have already gone through a pilot-testing. Also, it facilitates comparisons with previous research. To keep track of the respondents and be able to send out reminders, the municipalities were asked to specify which municipality they represent. The identification was needed to simplify the data collection and used to determine size, political power and tax income. Further, the identification was kept confidential, which was emphasized in the introduction letter.

To increase the internal validity, definitions of concepts and clarifications were made to avoid guesses from the respondents. The questionnaire was based mostly on closed questions with predetermined response alternatives. Those are beneficial since they can be codified with a likert scale, thus making it possible to perform the data analysis and make comparisons (Bryman & Bell, 2015), which is important to be able to fulfill the study's aim. In addition to the closed questions, some open questions were needed. When the design of the questionnaire was completed, pre-testing was used to detect any mistakes, which is of extra importance in online questionnaires as the questions cannot be changed as soon as the questionnaire is distributed (Van Der Stede, Young & Chen, 2006). Despite this preventive work, a few respondents had difficulties answering the last questions (section 7) since they seemed unsure on how to count the number of previous events. This may have had a negative effect on the response rate.

To increase the response rate, it was emphasized in the introduction letter and reminders that the incentive for participating is that the municipalities will get access to the study when it is completed. Participating municipalities are thus given an insight in how other municipalities

are working with whistleblowing systems. The response rate was 32.1 %, which is on the lower side but normal for studies involving organizational representatives and responses from top management (Baruch & Holtom, 2008). To get a higher response rate, two reminders were sent out to the individuals who had not responded, which are effective tools to increase the response rate (Van Der Stede, Young & Chen, 2006). The reminders positively affected the response rate, 55.9 % of the answers were received when the survey first was sent out. 31.2 % of the answers were received after the first reminder and 12.9 % after the second reminder. Thus, almost half of the answers were received after the reminders.

The high number of non-responders mean that there is a risk of consequent bias in the study. The people who did not answer may be systematically different from responders, i.e. non-responders have something in common (Sapsford, 2007; Van Der Stede, Young & Chen, 2006). The relevance of the topic may be one reason why some choose not to answer. If a whistleblowing system has been discussed in the municipality, they might be more inclined to participate in a study covering the topic. Further, non-responders came from all geographical areas. Another possible source of consequent bias is the size of the municipality. A review showed that the highest percentage of non-responders are found in the smaller size groups. The non-response rate is quite equal in group 1-6, however, group 7 is an outlier. This difference is to some extent explained by the small number of municipalities in that group, thus, each response makes a big impact on the non-response rate. The relatively small differences in the non-response bias is not expected to generate any consequent bias. Overall, the non-response bias is considered low in this study and will therefore have small effect on the generalizability.

Table 1 - Non-response

Non-response			
Groups	Total n	Non-responders	%
1	73	55	75.3
2	94	65	69.1
3	38	25	65.8
4	21	12	57.1
5	47	32	68.1
6	13	7	53.8
7	4	1	25.0
TOTAL	290	197	

3.3 Measurement of the factors

Size

Size is measured by dividing the municipalities in different size groups. The size of the municipalities is determined based on number of inhabitants. The data is available as official statistics, which means no question regarding this was included in the questionnaire. The municipalities are divided into seven different groups:

Table 2 - Groups of municipalities

Groups of municipalities	
Groups	n
(1) 0 – 10 000	73
(2) 10 001 – 20 000	94
(3) 20 001 – 30 000	38
(4) 30 001 – 40 000	21
(5) 40 001 – 100 000	47
(6) 100 001 – 200 000	13
(7) 200 001 +	4
TOTAL	290

Swedish municipalities differ a lot in size, which makes it hard to group them fairly. Sveriges Kommuner och Landsting (2017a) provides a grouping of municipalities which is based both on sizes and travelling habits of the citizens. Even though this grouping is an official one, it was not used. In this study, only the size of the municipalities based on number of citizens is of interest rather than other characteristics of the municipality. For instance, Sveriges Kommuner och Landsting (2017a) grouping of large municipalities consists of large cities as well as municipalities close to a large city, which gives a too broad definition. Consequently, the groups were created to best reflect the large spread in sizes, since there are large differences between the largest and the smallest municipalities. The median size of a Swedish municipality is 16.000 (SCB, 2018), which is why group 2 is the largest.

Legitimacy

The questionnaire included three statements relating to legitimacy. The statements are similar to the ones used by Pittroff (2014). All respondents had to answer these questions, however, the formulation of the question varies a bit between the different groups. Adopters were asked whether a whistleblowing system was implemented to increase the openness or trust of the

municipality and non-adopters were asked if they believe that a whistleblowing system may increase the openness or trust. A likert scale (1-7) was used to code the answers.

Cost

To measure the factor of cost, the respondents were asked to take a stand if the perceived cost of a whistleblowing system exceeds the benefits of a whistleblowing system. The statement is the same as the one Pittroff (2014) used, however, it was formulated in opposing ways between the groups and the answers therefore had to be coded differently. A likert scale 1-7 was used to code the answers. Further, municipalities that do not have and do not plan to adopt a whistleblowing system were also asked if the lack of resources is a reason for not adopting a system. To measure available resources, the factor of tax income per inhabitant was included. The data on tax income was retrieved from Ekonomifakta (2017) and based on official numbers from SCB and was thus not included in the survey questions. Those numbers were then transformed with a logarithmic function.

Previous events

The factor of previous events is measured by three questions in the questionnaire. All respondents were asked how many events of conflict of interest, bribes and irregularities they have experienced in the last five years. To be able to compare the groups, the answers were coded as follows:

- 0 Events: 1
- 1-2 Events: 2
- 3-5 Events: 3
- 6-9 Events: 4
- 10 + Events: 5

Moreover, adopters were asked specifically if they implemented a whistleblowing system to manage irregularities.

Political power explanations

The factor of political power is measured by dividing the municipalities into three different groups based on the ruling party: right-wing (alliansen), left-wing (social democrats and the left party) and mixed. The mixed group contains at least one right-wing party ruling with the social

democrats and/or the left party. The groups are almost equal in size, with 99 left wing, 89 right wing and 102 mixed municipalities (Sveriges Kommuner och Landsting, 2017b). No question was included in the questionnaire to measure this factor, since the information is official and was retrieved from Sveriges Kommuner och Landsting (2017b).

External influence

The questionnaire included three statements which aimed to measure the factor of external influence. Statements to non-adopters tried to measure how much knowledge they have about the use of whistleblowing systems in other organizations and adopters were asked if they based their decision to adopt on other organizations' use. A likert scale (1-7) was used to code the answers.

Legal consequences

To measure the factor, the respondents were asked to take a stand to a statement regarding legal consequences. Adopters were asked if the whistleblowing system was implemented to avoid legal consequences, and non-adopters were asked if they believe that a whistleblowing can help in avoiding that. The statement is the same as the one used in Pittroff's (2014) study. A likert scale (1-7) was used to code the answers.

Uncontrollable whistleblowing

One statement was included in the questionnaire to measure the factor of uncontrollable whistleblowing, more specifically if the municipalities implemented a whistleblowing system to avoid uncontrollable whistleblowing and damageable rumors. The statement is the same that the one used in Pittroff's (2014) study. A likert scale (1-7) was used to code the answers.

Design of whistleblowing system

Several questions were included in the questionnaire regarding the design of the whistleblowing system, which were asked to municipalities that have adopted a whistleblowing system. For example, the adopters were asked when the system was implemented, what it covers and how it is communicated within the municipality. These questions are needed to map how the systems are designed and to gain a deeper understanding of whistleblowing systems in municipalities. The data from these questions were divided into different themes and used to answer the second research question.

Other functions and guidelines

Questions regarding the use of other systems and guidelines were included in the questionnaire to capture how non-adopters combat misconduct. Like the questions regarding the design, these questions are important to be able to describe the groups. The municipalities were also asked if they have plans to implement a whistleblowing system since the phenomenon is relatively new and some might not have had the time to implement it yet.

3.4 Data analysis

When the data collection period was over, the form was closed and the data was exported from Google Forms to Excel. To ensure that all the data was transferred, a double check with the form online was made. The data was then divided into pages and summarized based on the different themes and factors. Some data had to be categorized, such as size and previous events. To ensure that the categorization of the size groups did not influence the results, the number of inhabitants were transformed with a logarithmic function and then tested the same way as the different size groups for significance. Further, the “don’t know”-answers were removed from the data when testing for significance. For each factor, the mean and standard deviation was calculated for both adopters and non-adopters. For comparisons between the two groups, a t-test was performed assuming unequal variance. The p-value used was two-tailed and the null-hypothesis was that the mean was the same for the two groups. Three significance levels were used: 5 %, 1 % and 0.1 % and they are presented in the tables as follows:

* = Significant at 5 %

** = Significant at 1 %

*** = Significant at 0.1 %

The data was then presented based on the different themes and factors. Some factors were summarized to a single average score, such as legitimacy and previous events. Further, as mentioned earlier, some factors had to be recalculated since the questions were asked a bit differently for the adopters and non-adopters.

4. Results

4.1 General results

93 municipalities answered, 91 responses came from the online questionnaire and 2 responses came from emails. Some of the responses were incomplete in the sense that some answers were missing. Therefore, the number of observations differs between the graphs. *Table 2* below divides the respondents into groups based on if they have adopted a whistleblowing system or not. Going forward, this grouping will be used to analyze the data.

Table 3 - Use of whistleblowing system

Results per group	Yes		Plan		No		Total	
	n	%	n	%	n	%	n	%
Whistleblowing system	14	15.1	5	5.4	74	79.6	93	100

4.2 Design of whistleblowing system - adopters

Background to adoption

All the respondents answered that the whistleblowing system had been implemented from the year 2013 and later. Thus, all whistleblowing systems are relatively new. Two respondents were unsure when it had been implemented and those respondents were also the ones who did not use the name whistleblowing system but said that it has the same function in practice. Those who are planning on adopting answered that they will do so this or next year, meaning that an implementation will occur in the near future.

Regarding the source of the idea of adopting a whistleblowing system, employees are the most common source of inspiration. This makes sense since employees are the ones most likely to utilize whistleblowing systems. Politicians were also a main source of the idea, where it came from both politicians in the opposition and the ruling party. Thus, the results indicate that there is an agreement over the party lines regarding the adoption of a whistleblowing system.

Table 4 - Idea

Idea for whistleblowing system		
Source	n	%
Employee	8	61.5
Politicians opposing party	7	53.8
Politicians ruling party	6	46.2
Management	3	23.1
Auditor/consultant	1	7.7
Municipality association	1	7.7

Moreover, the decision regarding adopting a whistleblowing system was in most cases taken by the executive board (kommunstyrelsen) or the city council (kommunfullmäktige). Thus, adopting a whistleblowing system is a political decision. A few municipalities answered that the decision was taken in a central collaboration or that no formal decision had been taken.

Coverage

In all 14 municipalities that have a whistleblowing system, employees are covered in the sense that they are able to send in a report. This is not surprising, since whistleblowing systems exist primarily to detect internal irregularities and misconduct. Few municipalities seem to accept reports from individuals outside the organization. In addition to the provided alternatives, two of the municipalities added that elected politicians are covered. Concerning the coverage of the whistleblowing system, most of the municipalities only selected one or two groups, where the mean is 1.71.

Table 5 - Individuals covered

Individuals covered		
Individuals	n	%
Employees	14	100
Individuals affected by municipality's activities	4	28.6
The public	4	28.6
Politicians	2	14.3

The whistleblowing systems seems to be communicated mainly via the intranet. It makes sense since employees are the primary individuals included by the function. Inside the organization, some municipalities also use meetings and education to spread awareness of the whistleblowing

system. However, if the function also covers the public, it obviously must be communicated through other channels. The website and official documents can be of help there. The municipalities that includes the public are also the ones who advertise their whistleblowing system on their website.

Table 6 - Communication channels

Communication		
Channels	n	%
Intranet	10	71.4
Meetings	5	35.8
Education	4	28.5
Website	4	28.5
Official documents	2	14.3

All municipalities that have a whistleblowing system answered that it covers bribes and irregularities (e.g. fraud and theft). Moreover, it is common that conflict of interest, discrimination and harassment is covered. Further, one respondent added that their whistleblowing system also covers other misconduct. Regarding how many options the respondents selected, the mean is 3.57. The mean indicates that all municipalities who have adopted a whistleblowing system accepts reports for a wide range of events.

Table 7 - Events covered

Events covered		
Events	n	%
Bribes	14	100
Irregularities	14	100
Conflict of interests	12	85.7
Discrimination and harassment	11	78.6
Other misconducts	1	7.1

Whistleblowing process

When blowing the whistle, there are several channels available to the whistleblower. The results show that individuals have several options to choose from. The mean is 2.31 regarding how many channels the reports are gathered through. This means that the most common is that municipalities have two or three reporting channels available. The most common channels used are a physical or digital mailbox.

Table 8 - Reporting channels

Reporting channels		
Channels	n	%
Physical mailbox	9	69.2
Digital mailbox	8	61.5
Form at intranet/website	6	46.2
Telephone number	6	46.2
External actor	1	7.7

The receiver of the report is classified as internal (within the municipality) or an external actor (outside the municipality). Only two municipalities use external actors as the receiver, more specifically they use a law firm or a security services company. Therefore, it seems more common with internal whistleblowing systems in municipalities. It corresponds well with Vandekerckhove and Lewis (2012), who stated that it is more common for public sector organizations to have the whistleblowing systems in-house. Most common is to have an appointed person/group or a lawyer to handle the collection.

Table 9 - Receiver of the reports

Receiver of the reports		
Internal/external	Receiver	n
Internal	Appointed person	4
Internal	Lawyer	3
Internal	Appointed group	2
Internal	Management	2
External	Law firm	1
External	Security company	1

About half of the respondents use the same actor for both collecting the reports and determining how to proceed with the investigation. The most common is that an internal lawyer handle the follow up, which makes sense since they can judge if the report has legal validity. Only one respondent uses an external party, a law firm, to make the judgement. It seems like the municipalities are preferring to handle the reports on their own, which makes sense since they have the most knowledge about the activities in the organization.

Further, it is most common that either the management or the executive board have the overall responsibility for follow-up and updates of the guidelines and routines. It seems reasonable that

those two groups have the main responsibility since these people are in charge of the municipalities' activities in general.

Outcome

To determine if whistleblowing systems in municipalities are effective, questions were asked about how many reports that have been obtained through the system as well as how many of those that were relevant. The percentage of relevant reports varies a lot between the municipalities, however, when calculating the number of relevant reports and dividing it with the number of total reports, it shows that only 27 % are relevant. The effectiveness of the whistleblowing systems to detect misconduct can thus be questioned. However, Pittroff (2014) concluded that the signaling effect of a system in private firms was more important than the actual effectiveness. The results from the survey indicate that this may be true for municipalities as well. The numbers are to some extent estimations from both the respondents and the authors, but the truth is probably quite close to this. Municipality K answered that no report had been received via the whistleblowing system, however, there had been events where the reports had been received via other channels. Municipality B, who has received a lot of reports, pointed out that for a whistleblowing system to be effective, and not just a channel for general complaints, there must be clear guidelines for the function. All three municipalities which have received the highest number of reports are large municipalities, i.e. belongs to size group six or seven. Further, it seems like the whistleblowers have a hard time to know what is relevant to report, thus, there is a risk that the whistleblowing system becomes a channel for general complaints rather than actual misconduct. This may be due to that the municipality provides insufficient information or that the municipality lacks other reporting channels of a more general character where general problems can be reported.

Table 10 - Received reports

Reports			
Municipality	Implemented	Reports in total	% Relevant
A	2014	100	25
B	2013	40	20
C	2017	25	28
D	2015	5	100
E	2015	5	20
F	2014	3	33
G	2018	2	100
H	2016	2	0
I	2017	2	N/A
J	2014	0	N/A
K	2018	0	N/A

Even though the effectiveness can be questioned, the municipalities seem to be satisfied with their whistleblowing system. The mean of the answers is 5.41. The municipalities seem to have similar perceptions when it comes to the satisfaction since the answers were pretty much the same for all. Moreover, the adopters are neutral (mean 3.76) to the statement if the guidelines and routines previous in place were sufficient.

4.3 Channels, guidelines and routines - non-adopters

Since the majority of the municipalities do not have a whistleblowing system, it is interesting to see how they combat the problems of misconduct. The questions were asked to planning municipalities as well. As expected, the score is low for the use of anonymous channels. However, somewhat surprisingly, five municipalities scored a six or a seven on the scale regarding the use of anonymous channels, which means that they use systems that correspond well to the definition of a whistleblowing system.

The non-adopters seem to use channels that accept more general complains as well as guidelines to prevent conflict of interests and bribes to a high extent, as indicated by the high means in the table. Codes of conduct are commonly used in private firms to gain legitimacy from stakeholders, however, its use in the public sector does not seem as common. The results show no consensus of the use, where the mean is close to average (3.58) and the standard deviation is quite large (2.18). 29 % of the municipalities scored 1 on the use of codes of conduct, thus, it is not used as much as the other channels.

Table 11 - Other channels used

Other channels used			
Channels	Mean	Median	SD
Anonymous channels	2.86	2	1.67
General channels	5.53	6	1.38
Guidelines to detect irregularities	4.74	5	1.81
Guidelines to prevent conflict of interests	5.40	6	1.61
Guidelines to prevent bribes	5.78	6	1.30
Codes of conduct	3.58	4	2.18

Furthermore, the non-adopters seem satisfied with the guidelines and routines they have in place today, giving the sufficiency an above average score (mean 5.04). Since they do not have a whistleblowing system, it makes sense that the municipalities believe that today's guidelines

and routines are sufficient, which several municipalities commented on. Even though they have not adopted one, nine municipalities have been recommended to implement a whistleblowing system. Most recommendations have come from elected politicians, sending in motions, or from the management. The executive board, a municipality association, citizens and consultancy firms are other recommenders.

4.4 Factors

Since the planners are few, they are included in the adopter group since both groups have made a choice to adopt a whistleblowing system.

Size

There are clear indications that whistleblowing systems are more frequent in large municipalities, since 58 % of the adopters and those who are planning on adopting are found in the largest municipalities (group 5-7). Somewhat surprising is that 26 % of the adopters are small municipalities (group 2). However, group 2 is the largest group in terms of number of municipalities, which means that the percentage of adopters still is low.

Non-adopters are found in all size groups, however, they tend to be small municipalities since more than half of the non-adopters belong to group 1 or 2. Further, some respondents left comments, explaining that their small size was the reason for not implementing a whistleblowing system. The results confirm what Lee and Fargher's (2013) found in private organizations, but more importantly what Statskontoret (2016) found in public organizations, that large organizations are more inclined than small ones to adopt a whistleblowing system. Some respondents argued that transparency is higher in smaller municipalities and that bribes and such are easier to detect. Further, one respondent brought up the presence of social networks in small municipalities, which might explain why small municipalities do not see a need to implement a whistleblowing system.

Table 12 - Size of the municipalities

Size Groups	Yes/Plan		No		Total
	n	%	n	%	n
(1) 0 – 10 000	0	0	18	24.3	18
(2) 10 001 – 20 000	5	26.3	24	32.4	29
(3) 20 001 – 30 000	2	10.5	11	14.9	13
(4) 30 001 – 40 000	1	5.3	8	10.8	9
(5) 40 001 – 100 000	5	26.3	10	13.5	15
(6) 100 001 – 200 000	4	21.1	2	2.7	6
(7) 200 001 +	2	10.5	1	1.4	3
TOTAL	19	100	74	100	94

The findings are further supported since there is a significant difference between the size of adopters and non-adopters. The result regarding the significance was the same when dividing the municipalities into size groups as when the number of inhabitants were transformed with a logarithmic function. Thus, the results show that size is a factor that seem to explain why some municipalities implement a whistleblowing system and others do not.

Table 13 - Comparison size

Factor	Range	Yes/Plan		No		p-value
		Mean	SD	Mean	SD	
Size (groups)	1-7	4.37	1.80	2.70	1.53	0.0011**
Size (log)	3.65-5.98	4.71	0.50	4.27	0.37	0.0017**

Legitimacy

The results for the adopters show that the mean is above average for all the statements related to legitimacy, which indicates that adopters agree that increased legitimacy was one of the reasons why they chose to adopt a whistleblowing system. To adopt a whistleblowing system to increase citizens' trust seems to be most common for the adopting municipalities, however, the differences are small between the measures. Moreover, one respondent left a comment that further emphasizes the importance of legitimacy. The municipality implemented a whistleblowing system to show citizens and the public that they actively work to prevent misconduct, which is a clear example of legitimacy. That type of argumentation is closely related to Liyanarachchi and Newdick (2009), who mentioned that a whistleblowing system can signal to potential whistleblowers and perpetrators that they are serious about preventing misconduct.

The non-adopters did not give the statements of legitimacy as high scores, rather they are neutral towards that a whistleblowing system increase the legitimacy of the municipality. There are small differences between the three statements, however, increasing the public’s trust seems somewhat more important. Since they do not have a whistleblowing system, they might believe that the system does not provide enough benefits concerning increased legitimacy.

There is significant difference between the adopters and non-adopters regarding legitimacy. The results from the survey are thus related to Pittroff’s (2014) findings, which showed that whistleblowing systems were implemented to increase legitimacy through a signaling effect.

Table 14 - Comparison legitimacy

Factor	Range	Yes/Plan		No		p-value
		Mean	SD	Mean	SD	
Legitimacy	1-7	5.39	1.69	3.47	1.59	0.0000***
Public’s trust	1-7	5.11	1.88	3.51	1.56	0.0029**
Citizens’ trust	1-7	5.55	1.58	3.47	1.55	0.0000***
Openness	1-7	5.50	1.65	3.43	1.69	0.0000***

Cost

The average mean for adopters is 4.60, which indicates that they slightly agree that the perceived costs were exceeding the measurable benefits at the time of implementation. However, even though the benefits in relation to the costs might not have been clear, they still decided to implement the system. Since most of the adopters are large municipalities, it can be assumed that they have enough resources to implement a whistleblowing system. These municipalities might have done it as they benefit from economies of scale, thus making it less costly, as argued by Pittroff (2014). However, when relating the answers from the statement to the size groups, no differences are found between the size groups in terms of costs exceeding the benefits.

Among the non-adopters, there is no strong agreement that the costs are larger than the benefits since the mean is close to average. Thus, no support is found that municipalities have refrained from adopting a system because they believe the costs in relation to the benefits are too high. The results are contrary to what Lee and Fargher (2013) found in private companies. When adding size as a factor, the results clearly indicate that the smaller the municipality is, the more

they seem to agree that the perceived costs outweigh the benefits. The mean of the answers become smaller as the size increases. This connects to Pittroff's (2014) argumentation, that small organizations are less likely to implement due to small resources. Moreover, a few respondents from small municipalities also pointed out that an implementation is a question of available resources, which might be scarce. It relates to the argument by Johansson and Siverbo (2009), that municipalities must be careful about not wasting resources, which is assumed to be of extra relevance in smaller municipalities.

Table 15 - Cost vs. benefits related to size

Costs vs. benefits Groups	Yes/Plan			No		
	n	Mean	SD	n	Mean	SD
(1) 0 – 10 000	0	N/A	N/A	17	4.59	2.03
(2) 10 001 – 20 000	5	4.40	2.61	24	3.38	2.20
(3) 20 001 – 30 000	2	5.50	2.12	10	3.50	2.59
(4) 30 001 – 40 000	1	5.00	N/A	7	3.14	2.00
(5) 40 001 – 100 000	5	4.20	3.03	10	3.00	2.11
(6) 100 001 – 200 000	4	5.00	2.31	2	3.00	3.00
(7) 200 001 +	1	4.00	N/A	1	1.00	N/A

No significant difference is found between adopters and non-adopters regarding their perception of costs exceeding the benefits. However, when analyzing if the tax income per citizen seem to have an impact on adoption, a significant difference between the two groups is found. This indicates that the more resources a municipality has, the more likely it is that they have a whistleblowing system. This corresponds to what Pittroff (2014) concluded, that large organizations are more likely to implement a whistleblowing system due to more available resources. Thus, available resources seem to have some impact regarding the decision to implement a whistleblowing system.

Table 16 - Comparison cost and tax income

Factor	Range	Yes/Plan		No		p-value
		Mean	SD	Mean	SD	
Cost	1-7	4.60	2.28	3.57	1.81	0.0847
Tax income	4.53-4.73	4.66	0.03	4.64	0.04	0.0132*

Previous events

The number of previous events is low in both adopting and non-adopting municipalities. In all three event categories, mostly none or only a single event has occurred. The most experienced

event of misconduct is irregularities, such as fraud or theft, however, as one respondent pointed out, those can be committed by people outside the organization. Conflict of interest and bribes always involve at least one person inside the organization. Even though the number of experienced events is low, those are only the events that have been discovered, so there might be some unknown cases. The uncertainty of previous events is clearly found in the result, since most respondents did not know how many had occurred in their municipality. However, a non-adopter did mention that events of misconduct in other municipalities have made them more observant of the risks.

In general, the adopters seemed neutral (mean 4.28) to the statement regarding if they adopted a whistleblowing system to manage misconduct. However, some high scores were given, thus indicating that the system in some cases was implemented as a reaction to previous events, which is an example of double-loop learning (Carmeli & Sheaffer, 2008). The high scores from some adopters also corresponds to what Watts & Zimmerman (1986 in Spira & Page, 2003) concluded, that scandals increase the pressure on the organization to implement a system. As mentioned earlier, previous events were a catalyst for the implementation in Gothenburg City (SOU 2014:31) and it might have been the case for other adopters as well. A non-adopter added in the comments that they do not need a whistleblowing system, since no serious misconducts have occurred in their municipality.

Table 17 - Previous events

Previous events	Yes/Plan						No					
	Conflicts of interest		Bribes		Irregularities		Conflicts of interest		Bribes		Irregularities	
Number of events	n	%	n	%	n	%	n	%	n	%	n	%
0	5	26.3	6	31.6	2	10.5	19	26.4	41	56.9	5	6.9
1-2	1	5.3	1	5.3	5	26.3	13	18.1	4	5.6	19	26.4
3-5	0	0	0	0	1	5.3	5	6.9	0	0	12	16.7
6-9	0	0	0	0	0	0	2	2.8	0	0	2	2.8
10+	0	0	0	0	1	5.3	1	1.4	0	0	3	4.2
Don't know	13	68.4	12	63.2	10	52.6	32	44.4	27	37.5	31	43.1
TOTAL	19	100	19	100	19	100	72	100	72	100	72	100

Based on the findings from previous research, it was expected that the adopters would have experienced more previous events than the non-adopters. However, there was no significant difference between the two groups. The only significant difference found was for conflict of interest, where the non-adopters actually had experienced a higher number of events.

Table 18 - Comparison previous events

Factor	Range	Yes/Plan		No		p-value
		Mean	SD	Mean	SD	
Previous events	1-5	1.59	0.96	1.78	1.01	0.4047
Conflicts of interest	1-5	1.17	0.41	1.83	1.01	0.0110*
Bribes	1-5	1.14	0.38	1.11	0.31	0.8266
Irregularities	1-5	2.22	1.20	2.49	1.03	0.5508

Political power explanations

Regarding political power in adopting municipalities, the results show that there is basically no difference. The results for adopters are almost equally distributed over the political parties. Thus, no ruling party seem to favor a whistleblowing system more than another. The results indicate that whistleblowing systems are ideologically neutral. Further, there is also little difference regarding political power in non-adopting municipalities. Most non-adopters are municipalities led by left-wing parties, but the difference is so small that no conclusion regarding this can be drawn. Since the sample size of non-adopters is quite large, it is natural that they would be a representation of the population.

Table 19 - Political power

Political power Groups	Yes/Plan		No	
	n	%	n	%
Left-wing	7	36.8	29	39.2
Right-wing	7	36.8	21	28.4
Mixed	5	26.3	24	32.4
TOTAL	19	100	74	100

External influence

The adopters strongly disagreed that they implemented a whistleblowing system because others had one. However, three out of eighteen adopters scored 6 on the recommendation statement, thus indicating that they implemented a whistleblowing system because an auditor or consultant suggested it. A recommendation is a more direct form of influence than just knowledge about what others are doing. Non-adopters seem to have some knowledge regarding how other municipalities use the systems. Some difference is found where the municipalities seem to have more knowledge regarding how the public sector work with whistleblowing systems rather than the private. The fact that municipalities belong to the public sector as well as the highly transparent climate may explain this result.

Since the implementation of whistleblowing systems in municipalities have happened recently, the external influence does not seem to have had an effect yet. Only about 20 % of the municipalities have implemented, thus, it can be seen as whistleblowing system in municipalities still is in the early adoption phase.

Table 20 - External influence - adopters

External influence			
Statement	Mean	Median	SD
Because other municipalities have	2.39	1.5	1.69
Because other firms have	1.94	1	1.76
Recommendation by auditor/consultant	2.11	1	1.94

Table 21 - External influence - non-adopters

External influence			
Statement	Mean	Median	SD
Knowledge how other municipalities work	3.89	4	1.64
Knowledge how other firms work	3.34	3	1.52
Knowledge how other public institutions work	3.79	4	1.60

Legal consequences

The results indicate that adopters did not implement a whistleblowing system to avoid legal consequences and that non-adopters disagree to the fact that a whistleblowing system is helpful to avoid legal consequences. This correspond to what Pittroff (2014) concluded in her study on private firms. Since municipalities operate in a special context, they must comply with laws concerning transparency and the principle of public access to official records. Thus, solving misconduct internally without the public's knowledge is not possible, contrary to the private sector where information can be kept internally. Some respondents also mentioned the laws as a hinder for implementing a whistleblowing system, since everything must be documented and made public. Further, there was no significant difference between the two groups and this factor does not seem to explain the decision to implement a whistleblowing system.

Table 22 - Comparison legal consequences

Factor	Range	Yes/Plan		No		p-value
		Mean	SD	Mean	SD	
Legal consequences	1-7	2.11	1.57	2.73	1.45	0.1402

Uncontrollable whistleblowing

Implementing a whistleblowing system to avoid uncontrollable whistleblowing to external sources and damageable rumors is something that the adopters disagree on. The mean of this factor is below average. Eight out of eighteen municipalities scored a 1, strongly disagreeing to the statement. The non-adopters also disagree that a whistleblowing system would be beneficial in avoiding uncontrollable whistleblowing and damageable rumors. Moreover, no significant difference was found between the two groups, therefore, the factor does not seem to influence the adoption.

The low mean for the two groups is not surprising, when considering the principle of confidentiality of sources. All public employees are protected by this principle, which means that when employees report through the whistleblowing system, their identity is not protected the same way as it is when reporting to the media. Therefore, the municipalities may believe that employees still prefer to report externally where their identity cannot be revealed, than to report through the whistleblowing system. Therefore, to avoid external whistleblowing is not a reason that explains the implementation of whistleblowing systems in municipalities and Pittroff (2014) drew the same conclusion in her study on private firms. Both adopters and non-adopters left comments that employees have the right and possibility to turn to the media if experiencing misconduct and that employees prefer to report through other channels. Further, one respondent said that instead of a whistleblowing system, they tried to have an open climate where employees should feel comfortable speaking out.

Table 23 - Comparison uncontrollable whistleblowing

Factor	Range	Yes/Plan		No		p-value
		Mean	SD	Mean	SD	
Uncontrollable whistleblowing	1-7	2.39	1.46	2.72	1.43	0.3913

5. Discussion

Since the majority of the municipalities still have not adopted, whistleblowing systems cannot be considered to have gained a status of a fashion in Swedish municipalities yet. Adopters do not seem to have been influenced by other sources when choosing to adopt a system, thus, it cannot be assumed that they adopted a system to imitate other organizations. If the non-adopters would feel pressured to implement a whistleblowing system, it is assumed that they would have more knowledge about other organizations' use. Therefore, one of the important characteristics of a fashion are not fulfilled. However, the adoption of whistleblowing systems has some characteristics in common with a fashion, indicating that the phenomenon has the potential to become a fashion in the upcoming years. For example, neither the efficiency nor the cost of the system is of highest concern when adopting. Rather, legitimacy is the main reason for adoption. If gaining a status of a fashion, more municipalities are expected to follow the early adopters since they feel pressure to adopt, according to the interorganizational theory (Haunschild & Miner, 1997). Then, the non-adopters may rethink the decision they made today regarding holding on to more general channels.

All whistleblowing systems have recently been adopted. Therefore, the design of the systems might not be fully developed yet. The whistleblowing systems primarily cover employees, which may be explained by the fact that they have extensive knowledge about the activities within the municipality and are most likely to utilize the system. The employees were also the ones that most often suggested the adoption, and whistleblowing systems can therefore be assumed to be positive for the employees. However, somewhat surprising is that the municipalities do not seem to accept reports from individuals outside the organization, only a few did so. Since the municipalities are working on behalf of and close to the public, making it possible for the public to report on misconduct could increase the trust in the municipalities. Further, the systems are quite extensive, covering a wide range of misconduct. However, the effectiveness of whistleblowing systems in municipalities can be questioned, since the number of relevant reports is low. There is a risk that the system is used more as a general complaint channel, which might be one reason why the municipalities have chosen not to include the public in the system. Even though a whistleblowing system might not have high effectiveness, the adopters are still satisfied with their system. Indications are given that the system is adopted due to symbolic reasons, such as being perceived as legitimate, and not since the system have

a positive measurable outcome. This might be the reason for the satisfaction, the system accomplishes what the municipality expected it to accomplish. Further, since the adopters were satisfied with the previous guidelines and routines in place, a conclusion can be drawn that a whistleblowing system work as a complement rather than a replacement to the other control elements.

Further, the results show that most adopters have a completely internal whistleblowing system, which is consistent with the research from Vandekerckhove and Lewis (2012) who stated that it is more common for public organizations to have it in-house. This might be explained by the assumption that employees in the municipalities have more knowledge about the people and activities going on than an external party, who will have to begin an investigation with limited knowledge. The people in the organization know it the best, and less resources will be spent on investigating the relevance of the report. However, the anonymity of the whistleblower must be considered when choosing to have the system in-house. When a whistleblowing system is internal, it is assumed that it is easier to search for the identity of the whistleblower than if an external party is handling the process. That, and the existence of the principle of public access to official record, might have some implications if the whistleblower feels comfortable reporting on misconduct. A whistleblowing system that is designed to keep the identity of the whistleblower a secret will probably mean that individuals will feel safe to report. If designed poorly, individuals might choose other reporting channels instead, such as the media, where they are protected by the principle of confidentiality of sources (Justitiedepartementet, 2015). Thus, a poor design might make the system ineffectual. The design decision to have several channels which whistleblowers can report through will most likely have a positive effect on the will to report since the whistleblower can choose what they are most comfortable with. Most adopters did have several different options where physical and digital mailboxes were most common. An advantage with a physical mailbox is that it is hard to track who has sent the letter, however, a risk is that the mailbox is not emptied as often, and reports might go unnoticed for some time. With a digital mailbox, it is easier to keep track on new reports, but a downside is that it is easier to track the sender of the report. For the whistleblowing system to have the desired effect, it is important that the whistleblower feel comfortable with reporting. Several options of reporting channels are a step towards that.

Among the non-adopters, some still use systems that can be classified as whistleblowing systems, however they claimed they did not have one. The case might be that they do not use the name whistleblowing system even though the system has a similar function. Further, some non-adopters argued that they do not need a whistleblowing system since they instead try to have an open climate. However, a whistleblowing system can be used simultaneously to signal that the municipality is open to reports and serious about preventing misconduct. The non-adopters also argued that their current guidelines and routines are sufficient to prevent misconduct, which might be a result of their extensive use of other guidelines and routines to prevent misconduct.

Size and legitimacy are the two main factors that seem to explain why some municipalities have adopted a whistleblowing system, which is consistent with the expectations and similar to the findings by Pittroff (2014) and Lee and Fargher (2013) in the private sector. Those factors have strong significant difference between the adopters and non-adopters. As discussed earlier, the effectiveness of the systems is low for adopters, still they were satisfied with the system. Thus, it further indicates that the signaling value of a system seem to be of higher importance than the effectiveness. The assumption is that the system is not adopted because it provides rational value, instead, the rhetorical or symbolic value seem to matter more. Thus, based on the results from the study, municipalities seem to seek acceptance from the society regarding their activities, which also corresponds with the research by Branco and Rodrigues (2006). Because municipalities experience higher pressure than private sector organizations (Branco & Rodrigues, 2006), the importance of the signaling value might be even higher for organizations in this sector.

The two measures included in the cost factor provided ambiguous results. It was a bit surprising since the expectation was that a whistleblowing system is adopted because it provides some type of rational value. However, the benefits versus cost measure was irrelevant for the decision of adoption. Therefore, other values that the whistleblowing system provides, such as signaling, is assumed to be of higher importance than the rational value. An explanation might be that the measurable benefits are hard to measure in exact terms, and the relationship to the cost therefore becomes uncertain. Even though some municipalities want to adopt a whistleblowing system, they might be restricted by their scarce resources. This may be an issue for smaller municipalities, as they have less resources available compared to larger municipalities (Lee &

Fargher, 2013). There is a significant difference between the adopters, who are larger in size, and the non-adopters regarding tax income. Thus, when resources are scarce, a whistleblowing system might not add enough measurable benefits to be justifiable. This is consistent with the argumentation by Johansson and Siverbo (2009), who states that municipalities must be careful about not wasting resources.

Somewhat unexpected, the non-adopters seem to have experienced more previous events than adopters, even though there was no significant difference for the factor as a whole. However, the results are a bit uncertain since many respondents did not know how many cases of misconduct that have occurred. Regarding conflict of interest, non-adopters had experienced significantly more events than adopters. This may be explained by that the non-adopters tend to be smaller municipalities and thus face a larger risk of conflict of interest, as pointed out by one respondent. Further, one reason for the unexpected results might be that the number of reports are irrelevant, rather, the seriousness of the event might be of greater importance for adoption. A single event of misconduct can get a lot of attention and thus affect the decision to adopt a whistleblowing system, which was evident in the case of Gothenburg City (SOU 2014:31). The external pressure to improve by adopting a whistleblowing system is likely higher for an event which has been extensively covered in the media, rather than for many minor events. Bribery and irregularities are done with malicious intent and are thus serious misconduct. Thus, those kinds of events might draw attention and put high pressure on the municipality to prevent them. Some non-adopters also said that no known misconduct had occurred, thus, the lack of previous events might be one explanation for not implementing a whistleblowing system.

The political ideology of the ruling party does not seem to have an influence on the decision to adopt a whistleblowing system, therefore adoption is perceived as ideologically neutral. However, even though ideology seems irrelevant, politics is still important to consider. When a whistleblowing system is adopted, the decision is made by politicians rather than the management, which is one of the major differences to the private sector. Even if the management want to implement a whistleblowing system, they might not have the ability to, since it is a political decision. On the opposite, the public managers may be forced to adopt a whistleblowing system if the politicians decide it. Politicians and management may have different focuses and opinions, such as the politicians wanting to gain votes without acting fully

rational, corresponding to a rhetorical value behind the adoption (Sturdy, 2004), while managers might want to stay within the budget, responding to a more rational interest (Sturdy, 2004). Since it was more common for politicians than managers to be the source of the idea to adopt a system, it may be a forced decision in some cases.

The more traditional factors of avoiding legal consequences and uncontrollable whistleblowing were found to be irrelevant to the decision of adopting a whistleblowing system. The results were expected, based on findings from previous research regarding the irrelevance in private firms (Pittroff, 2014). The results from these factors may be explained in the context of municipalities by the environment of high transparency and the principle of public access to official records. A whistleblowing system in municipalities cannot protect the municipality against legal consequences since all events and documents still need to be made public. Therefore, a whistleblowing system makes no difference in protecting the municipality from legal consequences. To explain the results of the factor of uncontrollable whistleblowing, one needs to consider both the principle of public access to official records and the principle of confidentiality of sources. Even if using a whistleblowing system, the anonymity of the whistleblower cannot be guaranteed since the reports need to be made official. Therefore, employees might turn directly to the media instead, where their identity cannot be revealed (Justitiedepartementet, 2015). Both these explanations are examples of hurdles for adoption.

6. Conclusion

Whistleblowing systems are a recent phenomenon within municipalities and the adoption is still in an early phase. The majority (80 %) of the municipalities still have not adopted a whistleblowing system. It is not considered a fashion yet but might become one in the future. The whistleblowing systems in the adopting municipalities are internal, mainly focused on the employees and covers a wide range of events. The decision was political and the inspiration came mainly from employees. Regarding the outcome, the relevance of reports is low, but the adopters are still satisfied with their system. The non-adopters use other channels and guidelines to a great extent and believe they are sufficient in preventing misconduct. They see no need to adopt one.

The adopting municipalities have some characteristics in common. They tend to be large municipalities that value legitimacy high. Their reason for adopting a whistleblowing system seems to be the symbolic value it represents, rather than to increase the effectiveness in the organization. Thus, the rational value is of less importance than the signaling effect. Political ideology, previous events and the perceived cost of the system do not have implications for an adoption. However, scarce resources in the municipality can provide hurdles for an adoption and lack of previous events might be one reason for not adopting. The traditional factors of legal consequences and uncontrollable whistleblowing do not affect the decision since the legal context of municipalities offsets them.

6.1 Contributions

The research on whistleblowing systems from an institutional perspective have been scarce. This study contributes to the literature on the use of whistleblowing systems in municipalities. The results have broadened the understanding of how the whistleblowing systems are used in practice since the design of the adopters are investigated. Further, it adds more knowledge to the existing literature to why an organization might choose to adopt a whistleblowing system.

Moreover, a practical contribution of the study is that it provides Swedish municipalities with an insight in how and why whistleblowing systems are used today, and thus makes it possible

for them to benchmark with each other. This study also open up for discussion regarding the topic and help to spread the awareness in the public sector on how to use internal control tools to detect and prevent misconduct. Thus, this study can be used as a support in the preventive work against misconduct.

6.2 Limitations

The response rate for the survey was on the lower side, however it is still considered to be acceptable. Obviously, a higher response rate would have been preferred, but some generalization can still be made. Since the questionnaire was sent to the whole population instead of to conveniently chosen populations, the generalizability of the study is increased. Moreover, the number of adopters is low, which makes it difficult to draw strong conclusions from their answers.

Since only one individual from each municipality answered the questionnaire, personal judgements are included, which means that the results might have been different if it was answered by another individual. The biases of the respondents thus have some implication for the reliability of the study since one individual may not fully reflect the beliefs that apply to the whole organization.

The questions in the survey are asked in different ways to adopters and non-adopters, which means that the comparisons between the groups may not be completely fair, and thus has implications for the validity of the study. Moreover, some respondents expressed difficulties answering questions in section 7 regarding previous events since the questions were open for the respondents' own interpretations. Other respondents had problems answering the questionnaire since they had held their position for a short time. Therefore, guessing from the respondents may have occurred, thus, the estimations and results should therefore be interpreted with caution. Further, since the questionnaire was sent out in Swedish, the answers had to be translated by the authors. Therefore, there is a risk that some definitions and comments were lost in translation.

6.3 Future research

Overall, research regarding whistleblowing system adoption in Sweden has been scarce. Some studies have been done in the private sector, however, the public sector is still relatively unexplored. Therefore, studies explaining the phenomenon in a public sector context is of special interest, and there is more to add on to the existing literature. Since the data in this study was collected through questionnaires, no in-depth insights were gained. Therefore, in upcoming studies, interviews can be conducted to increase the understanding of the phenomenon. Moreover, during the literature review, no studies were found comparing the private and public sector. The sectors differ a lot in terms of characteristics and governance and it is therefore of interest to see if reasons behind the adoption of a whistleblowing system and the use differs between the sectors.

The number of municipalities in Sweden that have adopted a whistleblowing system in the last few years has increased. Therefore, a prediction is that the fashion of whistleblowing systems will grow stronger since the external pressure to adopt new systems tend to increase over time with more adopters. A future study, similar to this one, is therefore of interest to see if the prediction is confirmed.

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Appendix I

Questionnaire

Section 1 – Background questions

- 1.1 Which municipality do you represent?**
- 1.2 What position do you hold in the municipality?**
- 1.3 For how long have you been working in the municipality?**
- 1.4 For how long have you hold your current position?**

Section 2

2.1 Do your municipality have a whistleblowing system?

A whistleblowing system is defined as specific reporting channels which makes it possible for individuals to report suspicions concerning the activities in the municipality, for example bribes, conflict of interest and fraud.

Yes No Don't know

Section 3

The questions in this section are asked because you previously answered that your municipality have a whistleblowing system in place.

3.1 In what year was the whistleblowing function implemented? Please specify.

3.2 From where came the idea of implementing a whistleblowing system?

Multiple answers possible

- Politicians from ruling party
- Politicians from opposing party
- Citizens in the municipality
- Employees
- Auditor/consultant
- Municipality association
- Labour's organization

- Media
- Another municipality
- Don't know
- Other, please specify..

3.3 In what instance was the decision of implementing a whistleblowing system taken?

- City council
- Municipal executive board
- Municipal executive group
- Don't know
- Other, please specify..

3.4 Which individuals are covered by the whistleblowing system?

Multiple answers possible

- Employees
- Individuals who are affected by the municipality's activities
- The public
- Other, please specify.

3.5 What type of events are covered by the whistleblowing system?

Multiple answers possible

- Conflict of interest
- Bribes
- Irregularities (e.g. fraud and theft)
- Discrimination and harassment
- Other, please specify...

3.6 Through which channels is reports gathered?

Multiple answers possible

- Physical mailbox

- Digital mailbox (email address)
- Form at intranet/website
- Telephone number
- Other, please specify...

3.7 Who is the receiver of the reports?

Multiple answers possible

- Audit firm
- Law firm
- Firm specialized in security services
- Appointed working group within the municipality
- Directorate within the municipality
- Lawyer within the municipality
- Another appointed individual within the municipality
- Other, please specify...

3.8 After the gathering of the reports, who is responsible for managing the reports?

I.e. is responsible of determining if the case is relevant and to bring it forward.

Multiple answers possible

- Audit firm
- Law firm
- Firm specialized in security services
- Appointed working group within the municipality
- Directorate within the municipality
- Lawyer within the municipality
- Another appointed individual within the municipality
- Other, please specify...

3.9 Who has the overall responsibility for the follow-up and update of routines and guidelines concerning the whistleblowing system?

Please specify...

3.10 How is the whistleblowing system communicated? (*Communication concerning what events that may be reported, procedure, who is responsible, anonymity etc*).

Multiple answers possible

- Meetings
- Education
- Intranet
- Website
- Bulletin-boards at the job site
- Information letters
- Other, please specify...

3.11 How many reports have been received through the whistleblowing system since its' implementation?

Please specify...

3.12 How many of these reports seemed relevant, i.e. concerned events that are covered by your whistleblowing system?

Please specify...

3.13 Opinions in the municipality regarding the whistleblowing system

Please take a stand for the following statements

The whistleblowing system was implemented to increase the public's trust in the municipality.

Do not agree

Agree

-

The whistleblowing system was implemented to increase the citizens' trust in the municipality.

Do not agree

Agree

-

The whistleblowing system was implemented to increase the openness in the municipality.

Do not agree Agree

The whistleblowing system was implemented because the measurable benefits seem to be larger than the costs.

Do not agree Agree

The whistleblowing system was implemented to avoid legal consequences since reported incidents can be solved internally.

Do not agree Agree

The whistleblowing system was implemented to avoid uncontrollable whistleblowing to external sources and damageable rumours.

Do not agree Agree

The whistleblowing system was implemented to manage irregularities.

Do not agree Agree

The guidelines and routines previously in place in the municipality were insufficient to detect and prevent conflict of interest, bribes and other irregularities (e.g. fraud and theft).

Do not agree Agree

The whistleblowing system was implemented because other municipalities have a whistleblowing system.

Do not agree Agree

The whistleblowing system was implemented because other companies have a whistleblowing system.

Do not agree Agree

The whistleblowing system was implemented due to a recommendation by an audit/consultancy firm.

Do not agree Agree

The municipality is currently satisfied with the whistleblowing system.

Do not agree Agree

3.14 Are there any other motives, besides from the ones mentioned above, to why the municipality implemented a whistleblowing system?

Please specify...

Section 4

The questions in this section are asked because you previously answered that your municipality does not have a whistleblowing system in place, or are unsure if you have one.

4.1 To what extent is the following used in the municipality?

Anonymous channels (e.g. to receive tips about irregularities)

Are not used To a large extent

Channels to receive tips, notions or complains of a more general character

Are not used To a large extent

Guidelines to detect irregularities (e.g. fraud and theft)

Are not used To a large extent

Guidelines to prevent conflicts of interest

Are not used To a large extent

Guidelines to prevent bribes

Are not used

To a large extent

Codes of conduct

Are not used

To a large extent

4.2 Did the municipality get any recommendation to implement a whistleblowing system?

Yes No Don't know

4.3 If yes, by whom?

4.4 Does the municipality plan to implement a whistleblowing system?

Yes No

Section 5

The questions in this section are asked because you previously answered that your municipality plans to implement a whistleblowing system.

5.1 When is the whistleblowing system to be implemented?

Please specify...

5.2 From where came the idea of implementing a whistleblowing system?

Multiple answers possible

- Politicians from ruling party
- Politicians from opposing party
- Citizens in the municipality
- Employees
- Auditor/consultant
- Municipality association
- Labour's organization
- Media

- Another municipality
- Don't know
- Other, please specify...

5.3 Please take stand to the following statements regarding the plans of implementing a whistleblowing system

The whistleblowing system is implemented to increase the public's trust in the municipality.

Do not agree Agree

The whistleblowing system is implemented to increase the citizens' trust in the municipality.

Do not agree Agree

The whistleblowing system is implemented to increase the openness in the municipality.

Do not agree Agree

The whistleblowing system is implemented because the measurable benefits are seen to be larger than the costs.

Do not agree Agree

The whistleblowing system is implemented to avoid legal consequences since reported incidents can be solved internally.

Do not agree Agree

The whistleblowing system is implemented to avoid uncontrollable whistleblowing to external sources and damageable rumours.

Do not agree Agree

The whistleblowing system is implemented to manage irregularities.

Do not agree

Agree

The guidelines and routines currently in place in the municipality are not sufficient to detect and prevent conflict of interest, bribes and other irregularities (e.g. fraud and theft).

Do not agree

Agree

The whistleblowing system is implemented because other municipalities have a whistleblowing system.

Do not agree

Agree

The whistleblowing system is implemented because other companies have a whistleblowing system.

Do not agree

Agree

The whistleblowing system is implemented due a recommendation by an audit/consultancy firm.

Do not agree

Agree

5.4 Are there any other motives, besides from the ones mentioned above, to why the municipality plans to implement a whistleblowing system?

Please specify...

Section 6

The questions in this section are asked because you previously answered that your municipality is not planning on implementing a whistleblowing system.

Below follows several statements. Please take a stand to how well the statements reflect the opinion in your municipality.

6.1 The guidelines and routines currently in place in the municipality are sufficient to detect and prevent conflict of interest, bribes and other irregularities (e.g. fraud and theft).

Do not agree Agree

6.2 A whistleblowing system in the municipality causes costs that are larger than the measurable benefits.

Do not agree Agree

6.3 The municipality does not have sufficient resources to implement a whistleblowing system.

Do not agree Agree

6.4 A whistleblowing system increases the public’s trust in the municipality.

Do not agree Agree

6.5 A whistleblowing system increases the citizens’ trust in the municipality.

Do not agree Agree

6.6 A whistleblowing system increases the openness in the municipality.

Do not agree Agree

6.7 A whistleblowing system can help to avoid legal consequences since reported incidents can be solved internally.

Do not agree Agree

6.8 A whistleblowing system can help to avoid uncontrollable whistleblowing to external sources and damageable rumours.

Do not agree Agree

6.9 In the municipality, there is knowledge about how private firms are working with whistleblowing systems.

Do not agree Agree

6.10 In the municipality, there is knowledge about how other municipalities are working with whistleblowing systems.

Do not agree Agree

6.11 In the municipality, there is knowledge about how other public institutions are working with whistleblowing systems.

Do not agree Agree

6.12 Are there any special reasons to why the municipality has not implemented a whistleblowing system?

Please specify...

6.13 Did the municipality previously have a whistleblowing system that has been removed?

Yes No Don't know

6.14 If yes, why was the whistleblowing system removed?

Please specify...

Section 7

The questions in this section are asked to all municipalities, independently of the use of a whistleblowing system.

7.1 How many events of conflict of interest have occurred in the last 5 years in your municipality?

0 1-2 3-5 6-9 10+ Don't know

7.2 How many events of bribes have occurred in the last 5 years in your municipality?

0 1-2 3-5 6-9 10+ Don't know

7.3 How many events of irregularities against the municipality's interests (e.g. fraud and theft) have occurred in the last 5 years in your municipality?

0 1-2 3-5 6-9 10+ Don't know

Completion

Do you have anything to comment?

Appendix II

Background to questions

Question	Number	Background
Section 1 - Introduction		
Name of municipality	1.1	Data collection
Position of respondent	1.2	Data collection
Time in municipality	1.3	Data collection
Time at position	1.4	Data collection
Section 2 – Whistleblowing system		
Whistleblowing system	2.1	Creation of groups
Section 3 – Adopters		
Year of implementation	3.1	Background to adoption
Source of idea	3.2	Background to adoption
Instance of decision	3.3	Background to adoption
Individuals covered	3.4	Coverage
Events covered	3.5	Coverage
Channels	3.6	Coverage
Receiver of reports	3.7	Whistleblowing process
Responsibility managing reports	3.8	Whistleblowing process
Responsibility follow-up and update	3.9	Whistleblowing process
Communication	3.10	Coverage
Number of reports received	3.11	Outcome
Relevance of received reports	3.12	Outcome
Public's trust	3.13	Legitimacy (factor)
Citizens' trust	3.13	Legitimacy (factor)
Openness	3.13	Legitimacy (factor)
Benefits larger than costs	3.13	Cost (factor)
Avoid legal consequences	3.13	Legal consequences (factor)
Avoid uncontrollable whistleblowing	3.13	Uncontrollable whistleblowing (factor)
Manage irregularities	3.13	Previous events (factor)
Guidelines and routines insufficient	3.13	Outcome
Because other municipalities have	3.13	External influence (factor)
Because other firms have	3.13	External influence (factor)
Due to recommendation audit/consultancy firm	3.13	External influence (factor)
Satisfied with the system	3.13	Outcome
Other motives behind adoption	3.13	Other
Section 4 – Non-adopters		
Anonymous channels	4.1	Channels, guidelines and routines of non-adopters
Channels to receive tips, complains etc.	4.1	Channels, guidelines and routines of non-adopters
Guidelines to detect irregularities	4.1	Channels, guidelines and routines of non-adopters
Guidelines to prevent conflict of interest	4.1	Channels, guidelines and routines of non-adopters
Guidelines to prevent bribes	4.1	Channels, guidelines and routines of non-adopters
Codes of conduct	4.1	Channels, guidelines and routines of non-adopters
Recommendation to implement	4.2	Channels, guidelines and routines of non-adopters
Recommender	4.3	Channels, guidelines and routines of non-adopters
Plans on implementing	4.4	Creation of groups

Section 5 – Non-adopters: Plans

Time of implementation	5.1	Background to adoption
Source of idea	5.2	Background to adoption
Public's trust	5.3	Legitimacy (factor)
Citizens' trust	5.3	Legitimacy (factor)
Openness	5.3	Legitimacy (factor)
Benefits larger than costs	5.3	Cost (factor)
Avoid legal consequences	5.3	Legal consequences (factor)
Avoid uncontrollable whistleblowing	5.3	Uncontrollable whistleblowing (factor)
Manage irregularities	5.3	Previous events (factor)
Guidelines and routines insufficient	5.3	Outcome
Because other municipalities have	5.3	External influence (factor)
Because other firms have	5.3	External influence (factor)
Due to recommendation audit/consultancy firm	5.3	External influence (factor)
Other motives behind adoption	5.4	Other

Section 6 – Non-adopters: No plans

Guidelines and routines sufficient	6.1	Channels, guidelines and routines of non-adopters
Costs larger than benefits	6.2	Cost (factor)
Resources insufficient	6.3	Cost (factor)
Public's trust	6.4	Legitimacy (factor)
Citizens' trust	6.5	Legitimacy (factor)
Openness	6.6	Legitimacy (factor)
Avoid legal consequences	6.7	Legal consequences (factor)
Avoid uncontrollable whistleblowing	6.8	Uncontrollable whistleblowing (factor)
Knowledge how private firms work	6.9	External influence (factor)
Knowledge how other municipalities work	6.10	External influence (factor)
Knowledge how other public institutions work	6.11	External influence (factor)
Reasons behind no implementation	6.12	Other
Previous use of whistleblowing system	6.13	Other
Reason for removal	6.14	Other

Section 7 – Number of events

Events conflict of interest	7.1	Previous events (factor)
Events bribes	7.2	Previous events (factor)
Events irregularities	7.3	Previous events (factor)

Completion

Comments	-	Other
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