

# Creating an ethogenic organisation: The development and implementation of a whistleblowing policy

Anton Senekal, Tina Uys

Department of Sociology, University of Johannesburg, Johannesburg, Gauteng, South Africa

## ABSTRACT

In spite of supposedly comprehensive protective legislation, evidence suggests that whistleblowers enjoy little effective legal protection. Rather than emphasising the processes needed to support, strengthen and protect the whistleblower, and thereby encouraging whistleblowing, this article explores ways in which whistleblowing could be pre-empted by institutionalising the spirit of whistleblowing through the creation of what we call an *ethogenic* organisation. In such an organisation, an organisational culture is established that allows and encourages all employees (including management) to identify and resolve issues of perceived wrongdoing in a way that is beneficial to everybody concerned, and is not driven by process.

**Key words:** Ethogenic organisation, organisational culture, whistleblowing, whistleblowing legislation, whistlegenic organisation, whistleblowing policy

## INTRODUCTION

Hunt (1998:533) suggests the existence of what he calls a *whistlegenic* organisation, an unethical organisation that generates the potential for whistleblowing: "The essential feature of such an organization might be general arrangements which fail to deter and rectify wrongdoing and fail to encourage ethical values and behaviour." He added that these characteristics are usually found in some common cultural patterns associated with unethical organisations. These would include a *laissez faire* culture, a climate of fear, and a culture of corruption and hypocrisy (Hunt, 1998:533-534). He expanded by saying, "Such organisations will generally have a gamut of internal failures, such as poor communication, low participation in decision making, dissonance in the values held by stakeholders and by the organisation in practice, and low morale. It is possible for such an organisation to maintain a high, if false, public reputation by gagging staff by sustaining a climate of insecurity or fear" (Hunt, 1998:534).

In an effort to counter the toxic climate within a whistlegenic organisation and to ensure that organisational wrongdoing is

exposed, much attention has been given to processes that would support, strengthen and protect the whistleblower. This includes the legislative framework that came into being in various countries, within which the whistleblower has to operate in order to be able to enjoy legal protection.

On the basis of numerous case studies and reports, we are convinced that whistleblowers, in fact, experience limited success in drawing attention to the disclosed irregularity (Alford, 2001; Carr and Lewis, 2010; de Maria, 2005; Rehg *et al.*, 2008; Uys, 2008). They also enjoy little effective legal protection in spite of comprehensive supposedly protective legislation (Alford, 2001; de Maria, 2006; Lewis and Uys, 2007; Rothschild, 2008; Vandekerckhove, 2006). Despite their noble intentions, whistleblowers are still subjected to pejorative, implicit and very often explicit labels pertaining to their "deviant" actions. They are, moreover, often severely traumatised, and suffer huge material and relational losses.

Against this background, society needs to move towards a dispensation where conventional whistleblowing will become redundant or superfluous as, what has been called the *spirit of whistleblowing*, becomes

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Address for correspondence:  
Dr. Anton Senekal,  
University of Johannesburg,  
Johannesburg, Gauteng,  
South Africa.  
E-mail: [asenekal@uj.ac.za](mailto:asenekal@uj.ac.za)

institutionalised within organisations. This involves a change of organisational culture to ensure that illegal or unethical behaviour is dealt with internally by means of established policies, procedures and structures on a routinised basis (Uys and Senekal, 2008).

The Woolf Committee (in the British Standards Institute, 2008:12) underscores this approach when it comments as follows: "...the sign of an open, healthy ethical organisational culture is when ethical concerns can be raised, discussed and resolved in line with the Company's values, principles and standards within the workplace and management line." The Protected Disclosures Act (No. 26 of 2000) (PDA) and the King III report (2009:56) recommend that organisations should consider the need for a confidential reporting process. This has highlighted the importance for employers to draft and implement a policy on the disclosure of information about organisational wrongdoing. Such a policy should enable the employee to disclose wrongdoing in a responsible and mutually beneficial manner. While implementation of such a policy should be welcomed, it does, of course, not necessarily mean that the organisation has adopted a culture with a spirit of whistleblowing. The institutionalisation of the spirit of whistleblowing requires more than the adoption of policies in order to conform to legislation.

The ethogenic organisation is the opposite of the whistleblowing organisation described by Hunt. The ethogenic organisation will try to pre-empt whistleblowing, thus making conventional whistleblowing redundant or superfluous. An ethogenic dispensation wants "an ethical way of doing things" because "doing the right thing" has become institutionalised as an essential component of the company culture. Another essential part of a dispensation like this would entail dealing routinely and openly with suspected unethical or illegal behaviour at the first sign of its appearance. This behaviour would typically and routinely be reported or raised as a concern, and dealt with on the initiative of the highest authority in the organisation. In so doing, the need for whistleblowing in the conventional sense of the word would be neutralised, and thus, the negative consequences for the individual and the organisation that are generally associated with it will be circumvented.

## TOWARDS AN ETHOGENIC ORGANISATION

Establishing an ethogenic organisation and hopefully an ethogenic dispensation in the public and private sector at large requires a paradigm shift in the way we think about whistleblowing. This paradigm shift will be facilitated when some or all of the following three prerequisites are met: value prerequisites, psycho-social prerequisites within organisations and prerequisites pertaining to changed conceptions of whistleblowing.

## Value prerequisites

The sub-text in much of the discourse on whistleblowing (especially outside of academia) is that we are dealing with an act that should, at worst, be despised and, at best, be approached with caution. It is often seen as a phenomenon that deviates from the generally accepted value that is operational in most societies, which is that one does not report on one's closest associates. In the minds of many people, whistleblowing is considered an act of treason. As such, it is considered to be a serious instance of social deviance in the sense that the whistleblower is deviating from the morality of loyalty. However, some people also admire whistleblowers and see them as moral champions standing up for what is right in spite of the costs to themselves. In so doing, whistleblowers are actually doing the company and the public a favour by, in effect, protecting the company's reputation in the long term (if the company deals with the instance of whistleblowing wisely, that is) and protecting the public against possible harm. As such, the whistleblower conforms to one of the most valued forms of behaviour in most societies – the morality of principle and, in so doing, espouses the value of integrity. Clearly then, the phenomenon of whistleblowing, and the whistleblower along with it, is suspended in the highly charged moral tension of the morality of loyalty on the one hand and the morality of principle on the other, pulling in opposite directions (Uys and Senekal, 2008).

The required paradigm shift demands that whistleblowing be defined as behaviour motivated by some of our noblest values. One way of attaining this definitional shift is to start thinking of whistleblowing as a form of "good deviance," which should be encouraged, as opposed to "bad deviance." This good deviance's spirit and intent should be encouraged and cherished. This kind of paradigm shift never takes place easily and without resistance, especially if it seems to involve an apparently serious moral contradiction, namely, having to think about or call something "good" that on the surface appears to be "bad." To facilitate this process and perhaps demonstrate that there is no substantive or real contradiction involved here requires a more extensive exposition of the basis of this argument. To this effect, we will discuss the hidden assumption that social conformity is usually preferable to social deviance, because the former is often taken to be good and the latter to be bad.

In an analysis of definitions of social deviance, Thio (1995:8) concludes with two approaches – the *positivist* (including those definitions with a specific focus on definitional precision and a scientific study of powerless deviants) and the *humanist* (including definitions with a specific focus on broader boundaries, labelling, and the study of powerful deviants). The sociological literature on deviance often implicitly suggests that it is the kind of behaviour that is to be avoided because it is considered bad, whereas the opposite category (i.e. conformity) is implicitly suggested

to be the kind of behaviour to be espoused because it is considered good. The question can be raised whether this is a valid assumption, whether made in popular discourse or in sociological literature. Looking at the difference between informative and evaluative knowledge will perhaps shed some light on how this question could be answered.

Social scientists, sociologists and probably all other students of human behaviour as well have to deal with two types of knowledge concerning the social reality they study. One type is *informative or categorical knowledge*, which is always and in all contexts, in a very explicit sense, present and operating in all human behaviours. For example, a pilot, hunter, or food gatherer, respectively, has to be in possession of and act in accordance with very distinctive sets of informative knowledge in order to fly a plane, successfully track down and kill an animal, or find food in the fields. In the same way, sociologists make use of informative knowledge when, among others things, they differentiate between deviant and conforming behaviour, and the characteristics of each.

The other, more implicit, type of knowledge, which is more fundamental than the first, and, furthermore, inseparably linked to the first, is *evaluative or normative knowledge*. Evaluative knowledge is the knowledge of good and evil that infuses and directs our informative knowledge.

Applied to the sociological study of the field of social deviance, it, therefore, becomes possible to construct a typology that relates to the above-mentioned types of knowledge in this particular context. Table 1 shows how such a typology would look like.

A very simple, yet fundamental, truth emerges from this typology, namely, it is possible to differentiate between good deviance and evil or bad deviance on the one hand and between good conformity and evil or bad conformity on the other. This differentiation, although found to be highly disturbing and unacceptable by some sociologists, for example, Rushing and Sagarin (in Thio, 1995), is not only logically appealing but also empirically convincing. It is convincing in the sense that most social scientists would probably acknowledge that not all forms of deviant behaviour are necessarily bad, for example, deviating from

a peer group norm that requires the use of drugs. Similarly, most, if not all, social scientists would have to agree that not all forms of conformity are necessarily good, for example, conforming to the dictates of a totalitarian, ethnocentric and racist leader (Senekal, 1999:449-451).

An interesting dynamic becomes apparent when considering social deviance and whistleblowing. This dynamic could be called *the battle of the definitions of social deviance*. The employee sees something questionable occurring in the organisation and raises these concerns, thereby essentially defining the state of affairs as a case of social deviance. In the hope of restoring the situation to what is considered right in the circumstances, the employee then finds him/herself being defined as a social deviant, especially from within the organisation, but sometimes, to some extent, also from the outside.

Without getting involved in the question of who is in the right and who is in the wrong or what the motives of any of the parties involved in a particular case are, a meta-situational issue here exceeds the situational in significance and relevance, and needs to be addressed. This issue will also enable us to decide whether whistleblowing could be considered a desirable or good form of deviance.

The meta-situational issue involved here relates to the generally accepted value that, if and when a particular situation raises concern of some kind, at least talking about this concern and trying to address it is highly desirable and preferable to denying or hiding it or becoming violent about it. The value underlying all of this and which is, in all likelihood, not bound by time and space, is the human conception that it is desirable to try and set things right where and when they are perceived to be wrong. How this intent is given substance within a particular culture, however, is of less importance than the fact that the intent *per se* will most likely be applauded universally.

As the whistleblower's actions are directed at making known and talking about perceived instances of behaviour considered to be either unethical, illegal or immoral (and which would, therefore, qualify as forms of undesirable social deviance) with a view to getting somebody to put these wrongs right, we could argue that whistleblowing convincingly constitutes a form of desirable or constructive deviance. This reflects a noble intent that should not be lost, but nurtured and directed towards a dispensation that would benefit both whistleblower and organisation. In this regard, a publication by the Institute of Chartered Accountants in England and Wales (2004:3) makes the following pertinent remark on the rationale for whistleblowing arrangements in organisations: "The whistleblower should be seen essentially as a witness, not as a complainant."

**Table 1: An evaluative typology on deviance and conformity**

		Sociological (categorical) definitions of	
		Conformity	Deviance
Evaluative definitions of	Good or beneficial	Constructive (good or beneficial) conformity	Constructive (good or beneficial) deviance
	Evil or harmful	Destructive (evil or harmful) conformity	Destructive (evil or harmful) deviance

Along similar lines, Miceli *et al.* (2008:93-94) argue for a distinction between beneficial and destructive deviant behaviour as it relates to whistleblowing. Destructive deviance would entail not complying with hypernorms, which are those norms that ensure the well-being of essential institutions, as well as reference group norms, the norms of a particular organisation or team. Whistleblowing would then constitute constructive deviance, as it entails deviance from reference group norms (loyalty to the norms of the organisation) and conformity to hypernorms.

In this sense then, it becomes clear that “good deviance” is indeed possible (and could, in fact, be desirable) as it pertains to, particularly, whistleblowing as an instance of good or constructive deviance. Redefining whistleblowing in these terms and internalising this conception of whistleblowing would be indicative of the value prerequisite having been met.

### Psycho-social prerequisites within organisations

Perhaps one of the most notorious obstacles in the way of developing an ethogenic dispensation in any organisation is a sense amongst employees that they are not free to report suspicious behaviour within their organisations and, furthermore, a fear of retaliation. In the 2007 Ernst and Young survey amongst 13 European countries, it was stated that companies “...should ensure that their code of conduct describes desired or required behaviour, rather than listing what is undesirable. To effectively promote desired behaviour, a code of conduct should focus on what it means to do the right thing. And the right thing includes being able to report suspected incidents of fraud, bribery and corruption” (2007:8). More than half the respondents believed people in their companies feel free to report such suspected incidents throughout Europe: 55% in Central and Eastern Europe and 58% in Western Europe (2007:8). This is an alarmingly low rate when measured against the ideal of 100%, which one would expect in an ethogenic dispensation where ALL employees should feel ENTIRELY free to report unethical or illegal behaviour at ANY time.

This should be seen in conjunction with the finding that the European average (Central, Eastern and Western) for respondents who would not report fraud, bribery or corruption for fear of reprisal from within the company amounts to 61%. The same set of respondents believed that 84% (European average) of their colleagues would not report cases of fraud, bribery and corruption for fear of reprisal from within the company (Ernst and Young, 2007:9). This is also an alarmingly high rate when measured against the ideal of 0% fearing reprisal, which should apply in a properly functioning ethogenic dispensation.

### Prerequisites pertaining to changed conceptions of whistleblowing

A further paradigm shift is required if an ethogenic dispensation is to be realised. This shift requires visualising

and accepting that a post-whistleblowing dispensation is possible in the sense that whistleblowing *per se* could successfully be replaced by a dispensation where the spirit of whistleblowing has been institutionalised in such a way (e.g., by institutionalising internal channels for reporting and dealing with wrongdoing the moment it becomes known) that conventional whistleblowing becomes superfluous. This possibility is being raised and discussed by an increasing number of scholars of whistleblowing, of which Ravishankar (2005) and Near and Dworkin (1998) are two examples.

This paradigm shift argued for could be facilitated by paying more attention to the preamble of the PDA of 2000 than to the Act itself, simply because the preamble verbalises the intent of the major argument of this paper. The intent of the Act is to:

*“...create a culture which will facilitate the disclosure of information by employees relating to criminal and other irregular conduct...;” and to “...promote the eradication of criminal and other irregular conduct in organs of state and private bodies.”*

This preamble implies that a culture facilitating the disclosure of information relating to criminal and other irregular behaviour is the preferred ideal towards which this particular legislation is supposed to be contributing. The implication is that when this culture has been achieved, conventional whistleblowing would, in all likelihood, become redundant.

According to Minnaar-Van Veijeren (2001:2-4), a number of international case studies, reported by Kotter and Heskett of the Harvard Business School, on the effect of an ethical culture on the performance of 207 large companies over an 11-year period convincingly illustrate the benefits (financial and otherwise) of ethical behaviour, compared to its opposite. Her conclusion is as follows:

*Over an eleven year period, the former [companies with an embedded culture of integrity] increased revenues by an average of 682 per cent versus 166 per cent for the latter, expanded their work force by 282 per cent versus 36 per cent, grew their stock prices by 901 per cent versus 74 per cent, improved their net incomes by 756 per cent versus 1 per cent. The favourable effect of an embedded culture of integrity on a company’s performance is thus abundantly clear.*

What all of this conveys is that a proactive approach (in our terms, working towards an ethogenic dispensation) is to be preferred to strengthening conventional whistleblowing through the legal protection of whistleblowers.

The Ernst and Young 2007 survey on Fraud Risk Mitigation amongst 13 European countries, referred to earlier, highlights certain benefits of a code of conduct to the company:

*A code of conduct helps employees make better choices when they find themselves in situations where they experience an ethical dilemma. In addition, employees are also better able to account for those choices, both to the company and to third parties such as vendors or clients. It is clearly much easier for employees to challenge unethical demands from others if they are supported by a clear, written, corporate code of conduct (2007:4).*

This is supported by the views of respondents in the same survey, who indicated that, where there is a code of conduct, between 60% (in Central and Eastern Europe) and 70% (Western Europe) believe that it is effective in preventing and detecting fraud. Respondents also believed that broadly speaking, "...people at their company comply with the code. Only 9% (14% Central and Eastern Europe and 7% Western Europe) of respondents across Europe believe that their colleagues would not comply with the code" (2007:7).

### Creating an ethogenic culture

After having explored the hazards of conventional whistleblowing for both the individual and the organisation, with reference to the WorldCom and Enron whistleblowers, Cynthia Cooper and Sherron Watkins, Ravishankar (2005) asks how companies can ensure that timely action is taken. She (2005:1) paradoxically suggests that, to prevent whistleblowing, whistleblowing has to be encouraged. She expands with the following question: "How do organisations encourage internal whistleblowing – that is, to an authority *within* the organisation – to preclude external whistleblowing and the resulting damage to an organisation?."

The goal of such a programme would have to be to encourage employees to bring ethical and legal violations they are aware of to an internal authority so that action can be taken immediately to resolve the problem, to minimise the organisation's exposure to the damage and, in so doing, to let employees know the organisation is serious about adherence to codes of conduct.

Ravishankar (2005) suggests the following steps for creating what we would like to call an ethogenic culture:

First, a policy should be created that includes formal processes, such as dedicated hotlines and mailboxes, where disclosures can be made. The process of voicing concerns (chain of command and who should be contacted) should be clearly communicated in the organisation. Furthermore, members of the organisation should be made to understand that retaliation against whistleblowers is prohibited, and performance measures should be linked to achieving goals in line with stated values.

In a survey on fraud risk management in 13 European countries, Ernst and Young (2007) also emphasised similar

elements in any effective anti-fraud program, namely: "Setting the proper tone in the company which covers the code of ethics or code of conduct, fraud prevention policies and optimising awareness.... pro-active anti-fraud measures and a fraud response plan" (2007:2).

Second, a whistleblowing culture requires endorsement from top management. This is a hugely important prerequisite for any attempt at establishing an ethogenic organisation. Ravishankar (2005:9) stated that, in this regard, "Top management, starting with the CEO, should demonstrate a strong commitment to encouraging whistleblowing." This requirement, of course, presupposes that top management is not involved in any wrongdoing.

Third, the organisation should actively publicise its commitment to creating an ethical environment in the organisation, through engaging with such issues in all the communication mediums at its disposal. Ravishankar (2005:10) expressed it well: "Publicly acknowledging and rewarding employees who pinpoint ethical issues is one way to send the message that management is serious about addressing issues before they become endemic." Similarly, Ernst and Young (2007:10) indicated thus: "To optimise the deterrent effect of a code of conduct, awareness levels should be constantly maintained, which implies a regular, ongoing program of education and training in support of the code of conduct."

In the fourth place, whistleblowing mechanisms will only be successful if all disclosures of perceived wrongdoing are investigated quickly and the outcome of the investigation is communicated to the appropriate stakeholders.

Finally, the organisation's internal whistleblowing system should be assessed on a regular basis. It is especially important to determine what the opinions of employees are with regard to the extent to which the organisation's culture matches its espoused commitment to promoting ethical behaviour.

### IMPLEMENTATION OF A SAFE REPORTING SYSTEM

To avoid unauthorised disclosure, a confidential or safe reporting system can be created as an interim measure. What it does in effect is to authorise disclosures that would otherwise have been unauthorised. A confidential reporting system is a mechanism whereby any member of the organisation can report any perceived wrongdoing within the organisation, without fear of victimisation. Reporting wrongdoing, therefore, becomes legitimate. A mechanism whereby employees can report wrongdoing confidentially prevents the messenger from being shot, whilst still allowing reports of wrongdoing to surface. The PDA requires whistleblowers to follow the safe reporting procedure of their employers in order to claim protection

against victimisation, unless the whistleblower has reason to believe that the safe reporting system is inadequate. Implementing such a system, therefore, provides a measure of protection to institutions against external whistleblowing, which could be very damaging to the organisation's reputation.

Of course, reporting is only safe if the reporter is assured that there will be external help (at no cost) in case of retaliation. The South African Labour Relations Act (LRA) does not provide that assurance, and neither does the PDA. The major problem is that criminal and company legislation tends to place the responsibility for the lawful conduct of the organisation on the shoulders of the company, its directors and certain officials. Only they have legitimacy. If the legislation can be amended to place the responsibility more widely (on the shoulders of all employees), then the employees would also have legitimacy.

A safe reporting system has the advantage that it allows a free flow of information on organisational wrongdoing. The absence of such a system obliges employees to report wrongdoing through the regular communication channels, which could have negative consequences for the particular employee who disclosed the information. Employees generally consider disclosure of wrongdoing a career-limiting move at best, and quite often, it proves to be a career-ending move. The prudent employee, therefore, tends to remain silent or leak information to the media or other institutions of authority outside the organisation.

The main objective of a safe reporting system is, therefore, to provide a safe avenue through which suspicions of unethical or illegal conduct can be raised. For such a system to be effective, a number of preconditions should be in place. These are as follows:

- The information that is disclosed should be handled confidentially, and the anonymity of employees should be protected as far as possible
- The reporting system should be complemented by a due process of investigation. Such investigations should be conducted in an inconspicuous manner to avoid suspicion, rumours, and embarrassment to employees and the accused person before hard evidence has been found
- The rewarding of employees whose reports of suspicious behaviour turn out to be true should be handled circumspectly. A reward system can easily be perceived as encouragement of employees to spy on one another, and should only be used if it is considered essential to the success of the safe reporting system
- A safe reporting system is only viable if there is a high level of internal trust in an organisation. If not, the reporting system is likely to come under suspicion and be abused for malicious purposes
- The safe reporting system should be embedded in an

ethical code of conduct for the organisation, with high buy-in by the majority of employees.

The main effects of such a system could be the following:

- ensuring that concerns about wrongdoing in the workplace are properly raised and addressed;
- promoting the whistleblower as a witness and not as a complainant;
- reassuring workers with genuine concerns that there is a safe alternative to silence; and
- helping everyone separate the message from the messenger.

### THE MAIN ELEMENTS OF A SAFE REPORTING SYSTEM

The following are elements that could be incorporated into a safe reporting system:

#### An anonymous hotline

One element of such a system is usually the outsourcing of a safe reporting channel to an independent company that runs an off-premises call centre facility. The outside company then gathers the information and provides the organisation with anonymous incident reports. These hotlines have become quite sophisticated over the years, and form an important part of the overall system. Unfortunately, organisations often tend to stop there, which means that provision is not made for the significant shortcomings of such hotlines.

As a minimum, the launch of an anonymous hotline should be considered. This would entail:

- Identifying the company to be used;
- negotiating the parameters of the service to be provided by this company;
- setting up a system for investigating reports of suspected organisational wrongdoing;
- propagating the establishment of the hotline amongst stakeholders;
- reviewing the effectiveness of the hotline at regular intervals; and
- providing information to staff with regard to the PDA.

#### Identifying and training whistleblowing champions

As a complement to the anonymous hotline, employees who could act as whistleblowing champions should be identified. These employees should be sufficiently senior to be able to deal with disclosures in an appropriate manner, and should enjoy sufficient confidence from a large group of employees, so that they will be prepared to raise concerns about organisational wrongdoing with them. It is often beneficial to use retired senior staff as whistleblowing champions. The Institute of Chartered Accountants in England and Wales (2004:3) indicated in this regard: "Successful whistleblowing procedures require strong leadership from the board and senior levels of management

to develop a culture in which staff are encouraged to raise their concerns, both internally and through the firm's whistleblowing procedures."

### An investigation unit

As the concerns raised could vary substantially in nature and scope, a unit needs to be established to be responsible for channelling particular concerns to the right location for investigation. This unit could be responsible for investigating concerns of a particularly sensitive or delicate nature.

### Internal whistleblowing managing forum

An internal forum or committee should be established, with the authority and explicit instruction or function to meet regularly on the basis of agreed-upon procedures, to focus on issues and concerns raised (and not people), to discuss, take the necessary corrective measures, and, if possible, resolve the issues and concerns.

### Feedback

Feedback should be provided to a body (which could be management or a combination of management, unions and employees) in order to achieve accountability. This body would oversee or supervise and report on the whole process and its outcomes. They would also determine the timing, nature and contents of the feedback to be given to the whistleblower in each particular case.

### Whistleblowing procedures

A safe reporting system will only be successful if it is supported and trusted. As a first step, appropriate clusters of employees should be identified for the purpose of holding workshops on the necessity for and composition of a safe reporting system. During these workshops, participants must be educated on the distinction between grievance procedures, actions in terms of the LRA, and the safe reporting system. The outcome of these workshops would determine the features of the safe reporting system to be put in place.

### Whistleblowing policy

An organisation aiming to establish an ethogenic culture needs to formulate and promote a whistleblowing policy that addresses the nature of the transgressions to be reported, the proposed recipients of information regarding the wrongdoing, the guidelines and formalities that need to be followed, issues of confidentiality and protection from retaliation, as well as details of the investigations to be conducted (Hassink *et al.*, 2007:40).

### CONCLUSION

It is clear from the preceding discussion that the creation of an ethogenic dispensation will demand persistent effort by all members of the organisation over an extended period of time and on a wide front. The benefits to be reaped once such

a dispensation has been institutionalised are numerous, the most important being the fact that conventional whistleblowing will have been rendered superfluous and the whistleblower will be liberated from the current necessity to seek dubious protection within the ambit of the law. This process could perhaps be facilitated further by exploring the possibility of developing an ethogenic scorecard for companies. The extent to which companies fulfil a number of whistleblowing-related criteria could result in an ethogenic rating. This could and would, in all likelihood, develop into a much sought-after rating by companies, on the basis of which a competitive edge in the public eye could be gained. This needs serious and thorough exploration.

We would, however, like to mention one caveat. Promoting an ethogenic culture should not mean neglecting the implementation and improvement of measures to provide protection to whistleblowers. Rather, a balance should be struck. Measures protecting whistleblowers still have an important role to play, especially where the top structure of an organisation is corrupt or important members of the top structure are involved in the wrongdoing.

In his book, *Envisioning Real Utopias*, Erik Olin Wright (2010:20-25) identifies three criteria according to which social alternatives to existing social structures and institutions could be evaluated, namely, desirability, viability and achievability. While establishing an ethogenic organisation is clearly desirable, the question is to what extent it would be viable and achievable. It is our contention that an ethogenic organisation would be viable and achievable if powerful actors in the organisation support and actively pursue its transformation.

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## AUTHORS

**Anton Senekal** is an associate professor in sociology at the University of Johannesburg, South Africa. His work focusses on social deviance and the role of the family in social integration, and he has published in the fields of social capital and whistleblowing. He was Chair of the department from 2001 to 2006, and serves on the editorial board of the *International Journal of Social Inquiry*.

**Tina Uys** is professor of sociology and a past head of the department (1995-2001 and 2007-2012). She is the Vice-President (National Associations) of the International Sociological Association (ISA) for the term 2010-2014. Her main research focus is on clinical sociology and whistleblowing, and she has also published on HIV/Aids, relative deprivation and developments in higher education.

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