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Whistleblowing in the *Fortune 1000*: What practitioners told us about wrongdoing in corporations in a pilot study

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ABSTRACT

This pilot study asked corporate public relations executives and practitioners in the largest publicly traded corporations in the United States about their involvement in developing and/or publicizing the anonymous, internal whistleblowing channel to report financial fraud mandated by the Sarbanes–Oxley Act of 2002, their awareness of wrongdoing, their reporting of wrongdoing, their view of their responsibility to report wrongdoing, and the consequences of reporting wrongdoing. The study found that two-thirds of respondents worked for corporations with the anonymous whistleblowing channel; only one-fifth helped develop it; almost two-thirds helped publicize it; almost half knew of wrongdoing during their careers or knew someone who did; two-thirds of those who knew about wrongdoing reported it; more than three-quarters who reported said reporting was not part of their job; virtually all who reported did so internally; almost two-thirds of those reported through chain-of-command channels; and one-third of those who reported (and were identified) suffered retaliation.

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1. Introduction

1.1. Importance of whistleblowing

Whistleblowing is important to society as a mode of “ethical resistance” (Glazer & Glazer, 1989, p. 11), to organizations as a method of communication (Richardson & McGlynn, 2007), to business as a means of informing management of operational problems (McGlynn & Richardson, 2014), to journalists as anonymous sources (Shepard, 2011), and to public relations, in part, as a means of dissent by practitioners (Berger & Reber, 2006). This exploratory pilot study suggests that whistleblowing also is important to public relations as a boundary spanning function (White & Dozier, 1992), as a form of internal communication mandated in publicly traded corporations (“Sarbanes–Oxley Act of 2002,”), as a precipitating event for crisis management by organizations (Bush, 2011; Coombs, 2012), and as an aspect of ethical public relations practice (Bowen, Heath, & Lee, 2006).

Whistleblowing has been a topic of media and public interest since the Vietnam War (Witcover, 1971), and it continues to be a topic of interest today in part through the actions of United States Army Private First Class Bradley/Chelsea Manning (Tate & Londoño, 2013), United States National Security Agency contractor Edward Snowden (Finn & Horwitz, 2013), and WikiLeaks founder Julian Assange (Horwitz, 2013). The most common definition of whistleblower is a member of a group who goes against group norms and attempts to change improper group behavior by alerting an internal or external authority

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(Miceli & Near, 1984). Although the United States government began encouraging private citizens to report government fraud during the Civil War, “Ethical resisters—employees who publicly disclose unethical or illegal practices in the workplace—are a recent phenomenon in American history” (Glazer & Glazer, 1989, p. 4).

Whistleblowing emerged in the 1960s and 1970s as an outgrowth of “the civil rights, antiwar, consumer, and student protest movements” (Westin, 1981, p. 7). It became a topic of extensive media interest in 1971 when defense contract employee Daniel Ellsberg leaked the Pentagon Papers, a history of the involvement of the United States in the Vietnam War, to *The New York Times* (Witcover, 1971). Subsequent actions by President Richard M. Nixon’s administration, including the burglary of Ellsberg’s psychiatrist’s office and the burglary and wiretapping of the Democratic National Committee headquarters at the Watergate Hotel, were exposed by *The Washington Post* with help from an anonymous whistleblower, Deep Throat (*The Washington Post*, 2008). The Post’s investigation of the Watergate break-in led to Nixon’s resignation (*The Washington Post*, 2008), but Deep Throat’s identity remained a secret until 2005, when he revealed himself as W. Mark Felt, deputy director of the FBI at the time of Watergate (O’Connor, 2005). Following Watergate, the U.S. Congress initiated changes to encourage whistleblowing by federal employees, and the federal government conducted three studies of federal employees to determine the effectiveness of those changes (U.S. Merit Systems Protection Board, 1981, 1984, 1993).

In recent years, whistleblowers have alleged improper accounting methods by Enron and WorldCom and failure by the FBI to prevent 9/11 despite prior intelligence. Their actions led *Time Magazine* to label 2002 “The Year of the Whistle-Blowers” and name those involved—Sherron Watkins (Enron), Cynthia Cooper (WorldCom), and Coleen Rowley (FBI)—“Persons of the Year” (Lacayo & Ripley, 2002, December 30). The magazine elevated the whistleblower to hero, or in this case, heroine, and recognized the societal good produced by the whistleblower. The actions of Watkins and Cooper also led to the passage by the United States Congress of the Public Company Accounting Reform and Investor Protection Act of 2002 (the Sarbanes–Oxley Act of 2002 or SOX), which was designed to increase financial oversight and transparency, auditor independence, and corporate accountability (Brickey, 2003). Sarbanes–Oxley was also the first legislation to require publicly traded companies to maintain a communication channel for employees to report financial irregularities (Moberly, 2006).

1.2. Whistleblowing in government

United States citizens have been encouraged to file suit against the federal government for fraudulent activities since passage of the 1863 False Claims Act, and numerous laws have been passed, with varying degrees of success, to protect federal employees from retaliation for reporting wrongdoing in government. In 1978, following Watergate, the United States Congress passed the Civil Service Reform Act (CSRA), which protected federal whistleblowers and prohibited retaliation against them through creation of the United States Merit System Protection Board (USMSPB).

To evaluate the effectiveness of CSRA in protecting federal employees from retaliation for blowing the whistle, the USMSPB conducted three stratified random sample surveys of the entire federal government over 12 years, with a total of 39,000 federal employees responding, to identify trends in their observation of wrongdoing, their reporting of wrongdoing, and any retaliation they experienced (U.S. Merit Systems Protection Board, 1981, 1984, 1993).

The three USMSPB studies considered eight specific variables, plus demographic data: incidence of wrongdoing (the number of respondents who observed one or more of 10 types of wrongdoing divided by the number of respondents); incidence of whistleblowing (the number who reported serious wrongdoing divided by the number who observed wrongdoing); incidence of identified whistleblowing (the number of whistleblowers who report being identified divided by the number of whistleblowers); incidence of retaliation (the number of identified whistleblowers who experienced retaliation divided by the number who reported wrongdoing); comprehensiveness of retaliation (the total of actual and implied retaliation); lack of support management and/or co-workers; seriousness of wrongdoing (dollar value and frequency); whistleblowing channel (internal and/or external); and demographic data (race, gender, education, organizational tenure, job tenure, pay grade, job classification, supervisory position, and most recent performance rating) (Near, Ryan, & Miceli, 1995).

These studies have been deemed highly valuable for their large sample size, sampling method, high response rate, consistency among the three questionnaires, and public availability of data captured at three different times (Near & Miceli, 2008).

1.3. Whistleblowing in management

1.3.1. Definition of whistleblowing

Management scholars have been using the data from the three federal studies to examine whistleblowing since the 1980s. Those scholars define whistleblowing as the act of a current or former employee who reports wrongdoing (i.e., illegal, wasteful, or unethical activities) to someone who can do something about it (Near & Miceli, 1985). This reporting can be done internally through chain-of-command channels or anonymous whistleblowing channels, externally through government agencies or watchdog groups, and/or externally through media outlets as unnamed sources (Miceli & Near, 1984). The assumed results of such action are success, failure, and/or retaliation (Rehg, Miceli, Near, & Van Scotter, 2008).

1.3.2. Whistleblowing studies in management

Management’s handling of the demands of whistleblowers has been the focus of much of the whistleblowing research in management literature, which has included investigations of predictors of wrongdoing, predictors of whistleblowing, and

predictors of organizational response to whistleblowing (Miceli, Near, & Dworkin, 2008). Attempts to predict whistleblowing and its effects have involved various theories, including power (Miceli & Near, 1994), resource dependence (Miceli & Near, 1985), justice (Near, Dworkin, & Miceli, 1993), social roles (Rehg, Miceli, Near, & Van Scotter, 2008), and deviance (Miceli & Near, 1997).

1.4. Whistleblowing in corporations

Employees in the private sector received their first protection for whistleblowing from the Sarbanes–Oxley Act, passed by the U.S. Congress in 2002. The Sarbanes–Oxley Act requires publicly traded companies to establish an anonymous communication channel to the audit committee of the board of directors to allow employees to report financial wrongdoing. It also protects employees when they report financial wrongdoing (“Sarbanes–Oxley Act of 2002,”).

1.5. Whistleblowing in communication

Whistleblowing has been identified as an act of communication by scholars in communication (Keenan, 1988; Richardson, 2005; Richardson & McGlynn, 2007) and management (Miceli et al., 2008). Communication scholars have studied whistleblowing from the standpoint of upward communication (King, 1997), organizational climate (Keenan, 1988), interpersonal closeness (King, 1997), interpersonal influence (Henningsen, Valde, & Denbow, 2013), feminism (Simon, 2013), intent to blow the whistle (Richardson, Wang, & Hall, 2012), alternatives to whistleblowing (Teo & Caspersz, 2011), organizational structure (Richardson, 2005), public versus private support (McGlynn & Richardson, 2014), and image repair (King, 2006), to name a few.

1.6. Whistleblowing in public relations

Management scholars who study whistleblowing have recommended that organizations communicate with employees about appropriate whistleblowing and encourage whistleblowing by engaging employees in “participation and two-way communication” (Miceli, Near, & Schwenk, 1991, p. 126). Yet, as a discipline, public relations has not acknowledged whistleblowing as an area of concern from an organizational or employee communication standpoint, as an activity in which public relations practitioners engage, or as a separate topic of public relations research, despite calls to do so (Greenwood, 2009, 2011, 2012, 2013, 2014).

1.6.1. Whistleblowing and dissent

Whistleblowing has been studied most extensively in public relations as one of several “dissent” tactics that, along with leaking information, public relations practitioners may use to influence their organizations (Berger, 2005; Berger & Reber, 2006; Kang & Berger, 2010; Kang, Berger, & Shin, 2012). In the Berger and Reber (2006) studies, only 4% said they would blow the whistle on an illegal activity, and only 1% said they would use hot lines or audit committees to report illegal activity. A recent study of U.S. and South Korean practitioners reaffirmed that neither U.S. practitioners nor South Korean practitioners were likely to leak information, although U.S. practitioners were less inclined to leak information than their South Korean colleagues (Kang, Berger, & Shin, 2012).

These studies indicate that public relations practitioners do not accept whistleblowing internally or externally as an appropriate role for public relations, even though traditional public relations roles such as boundary spanning, providing advice and counsel to management, and bringing bad news to management (White & Dozier, 1992) fall within the definition of whistleblowing accepted by the federal government and the management scholars who study the federal data.

1.6.2. Whistleblowing and boundary spanning

One of the longstanding goals of public relations practitioners has been to gain a seat at the management table in order to participate in executive decision-making (Dozier, 1992; Berger & Reber, 2006). One of the ways in which they accomplish that goal is by acting as boundary spanners who scan the external environment, identify issues of concern to management, and raise those issues within the dominant coalition (Aldrich & Herker, 1977, in White & Dozier, 1992). In other words, public relations managers and practitioners are expected to bring bad external news to management (Dozier & Grunig, 1992; Berger & Reber, 2006). However, Jason Vines, former vice president of corporate communications for Chrysler, acknowledged the need to bring internal bad news to management in arguing that public relations should report to the chief executive officer:

You almost have to be the CEO's alter ego. . . Once the relationship is developed, you can almost replace one another because you're thinking along the same lines all the time. . . You have to have the guts to tell the CEO when he's naked and to be able to say it without fear of retribution (in Cobb, 2008, p. 6).

1.6.3. Whistleblowing and internal communications

Internal communication within an organization—communication between the organization and employees and between the supervisor and employees—is an acknowledged function of public relations (Karanges, Johnston, Beatson, & Lings, 2015). Telephone hotlines are one valued form of internal communication used by employees to communicate with management, at

least with regard to benefit information (Freitag & Picherit-Duthler, 2004). Even though Sarbanes–Oxley is the first legislation to require publicly traded companies to maintain a communication channel for employees to report financial irregularities (Moberly, 2006), the connection between Sarbanes–Oxley’s internal communication requirements and public relations’ role in internal communications has not been explored outside studies of influence strategies in public relations (Berger, 2005; Berger & Reber, 2006).

1.6.4. Whistleblowing and crisis communication

The primary function of crisis communication is organizational image repair (Liu & Fraustino, 2014), and media accounts of corporate wrongdoing have challenged communicators’ ability to maintain organizational image (Pompper, 2014). As Watergate (The Washington Post, 2008) and more recent events have demonstrated (Coddington, 2012; Fantz, 2011; Keller, 2011), organizational image can be damaged when internal documents not intended for public consumption are made public (Uysal & Yang, 2013). When WikiLeaks, “an activist group” (2013, p. 459), published private Bank of America documents, Bank of America stock prices went down, which illustrated the power of online activism (Uysal & Yang, 2013).

1.6.5. Whistleblowing and ethical public relations practice

Public relations practitioners are in a unique position to critique their organization’s actions and motives, a role that some argue they should undertake more vigorously (Bowen, Heath, & Lee, 2006; Grunig, Grunig, & Dozier, 2002; Holtzhausen, 2000; Holtzhausen & Voto, 2002). Although polarized about the role of ethical advisor to management (Bowen, 2008), many public relations practitioners consider this one of their most important roles (Bowen, Heath, & Lee, 2006). “Good public relations has been called the corporate conscience—an indispensable attribute of modern and progressive business” (Hill, J. W., 1958, in 2006, p. 12). Almost a quarter of public relations practitioners have used ethical advocacy to encourage their organizations to correct their behavior (Berger & Reber, 2006), and the act of making that argument inside the organization falls within the broader definition of whistleblowing (U.S. Merit Systems Protection Board, 1981, 1984, 1993).

1.7. The current study

This pilot study answered the call to extend the federal research on whistleblowing to the private sector (Miceli & Near, 1985).

The Excellence study (Grunig & Grunig, 1992; Grunig, Grunig, & Dozier, 2002) linked the communication manager role as part of, or at least reporting to, the dominant coalition, and whistleblowing research has linked whistleblowing to job level, with higher-level employees more likely to blow the whistle internally (Miceli & Near, 1984). As a result, one area of interest for this study was whistleblowing, including internal reporting, among top-ranking public relations executives.

Because whistleblowing is a longstanding research topic in government and in the field of management, but a relatively new area of study in public relations, this study attempted to extend the federal and management discussions of whistleblowing into public relations. The study gathered data about the role the top-ranking public relations executives in the *Fortune 1000* companies in 2009 played in developing and/or publicizing the internal, anonymous whistleblowing channels mandated by the Sarbanes–Oxley Act, their awareness of wrongdoing, their reporting of wrongdoing, their view of their responsibility to report wrongdoing, and the consequences to them of reporting wrongdoing.

This study made three contributions to existing research on whistleblowing. It administered an adaptation of the USMSPB whistleblowing survey to public relations executives and practitioners in the *Fortune 1000*; it extended the management research on whistleblowing into public relations; and it explored whistleblowing as a role-prescribed function of public relations practice. Specifically, this study attempted to answer the following research questions:

RQ1: Have public relations executives of *Fortune 1000* corporations been involved in developing and publicizing Sarbanes–Oxley whistleblowing channels?

RQ2: Have they felt it necessary to blow the whistle internally or externally?

RQ3: Do they consider it their responsibility to blow the whistle internally or externally?

RQ4: What channels do they use to blow the whistle internally or externally?

RQ5: How have they been treated by their corporations?

RQ6: Do female whistleblowers experience more retaliation than male whistleblowers?

The findings have implications for public relations roles, dissent, leaks, internal communication, crisis communication and ethics, as well as the broader topics of whistleblowing and Sarbanes–Oxley implementation.

2. Methods

2.1. Sampling

The researcher conducted a census through an anonymous, online survey of the highest-ranking public relations executive in each of the 999 companies on the 2009 *Fortune 1000* companies. She distributed an email with an encrypted link to an anonymous, online survey questionnaire to the members of her target population. Because there was no available list of names or email addresses for this population, she built the list by reviewing more than 500 corporate Websites, news releases, annual reports, and other published material. She also used a commercial business contact database, Mint Global, which

collects job titles and contact information for employees of publicly traded companies in the United States via published information, personal contact and commercial arrangements with various online information providers.

A low initial response rate led her to return to original sources (websites, news releases, corporate financial documents, other published materials and the database) to replace undeliverable emails with corrected email addresses or a different contact in each company that had not responded. In all, she sent three email contacts to a total of 2,291 executives and practitioners working in public relations, public affairs, communication, corporate affairs, marketing and advertising departments in the *Fortune 1000* companies.

2.2. Questionnaire

2.2.1. Sarbanes–Oxley questions

The questionnaire first asked if the respondent's organization had an anonymous communication channel to the audit committee of the board of directors, if the person or someone who worked for the person had helped develop the channel, and if the person or someone who worked for the person had helped publicize the channel. The questionnaire asked two sets of eight questions adapted from the 1981 USMSPB survey of federal employees.

2.2.2. Whistleblowing questions

The first set of questions was designed to introduce the respondent to the line of questioning and start the thought process about wrongdoing and whistleblowing. It asked about the respondent's knowledge of another public relations executive who had been aware of wrongdoing. The second set of virtually identical questions asked about the respondent's own knowledge of wrongdoing in his or her current corporation.

The first set of questions asked if the respondent had ever been aware of a public relations executive other than him or herself who was aware of an illegal, wasteful, or unethical activity involving the organization for which he or she worked; the dollar amount of the activity (less than \$1000, \$1000–49,999, \$50,000–99,999, \$100,000–500,000, greater than \$500,000, or Don't know); how frequently the activity had occurred (Rarely, Occasionally, Frequently, Don't know); whether or not the individual had reported the activity (No, Yes, Don't know); whether or not reporting was a routine part of the person's job (No, Yes, Don't know); how the person had reported the activity (Internally through chain-of-command, Internally through anonymous channel, Externally, or Don't know); whether or not the person reporting the activity had been identified as the source of the report (No, Yes, Don't know); and if the person had been identified, what had happened to the him or her (Person was rewarded, Nothing happened to person, Person's co-workers were unhappy with him/her, Person's supervisor was unhappy with him/her, Someone above person's supervisor was unhappy with him/her, Person experienced retaliation, or Don't know).

The second set of questions was directed toward the respondent to elicit his or her first-hand knowledge about wrongdoing in his or her organization. The questions were identical with the exception of being directed toward the respondent. The "Don't know" option was not included. Each set ended with an open-ended question soliciting comment about the topic.

2.2.3. Demographic questions

The questionnaire also included demographic questions and other questions previously identified in whistleblowing research as having some value in predicting whistleblowing and/or retaliation. These included race, gender, age, education level, salary, number of years with current employer, number of years in current position, responsibility for writing performance appraisals (designed to establish managerial level); and level of most recent performance appraisal (Unacceptable, Minimally successful, Fully successful, Exceeds fully successful, Outstanding).

2.2.4. Public relations questions

The researcher added three questions directed to this population, including whether or not the person was the highest-ranking public relations executive in his or her current organization, the location of his or her position in relation to the chief executive officer (I am the Chief Executive Officer; I report to the Chief Executive Officer; I report to someone who reports to the Chief Executive Officer; I report to someone who reports to someone who reports to the Chief Executive Officer; Other), and the location of his or her position within the organization (Public Relations Department, Corporate Communications Department, Marketing Department, Sales Department, Finance & Administration Department, and Other).

2.3. Analysis

The researcher used the Statistical Package for Social Science Research, version 19, to analyze the results. Due to the exploratory nature of the study, she reported only descriptive statistics, frequencies, and post-hoc Chi-square analyses to show differences between categorical variables.

Table 1
 Employment variables.

Variables	Category	All respondents		Top-ranking PR Exec.	
		Frequencies	Percent	Frequencies	Percent
Years with company	1–10	34	61.8	21	58.3
	>10	21	38.2	15	41.7
Years in position	1–5	40	71.4	24	66.7
	>5	16	28.6	12	33.3
Current salary	<\$100,000	11	20.8	6	17.6
	\$100,000–199,999	23	43.4	10	29.4
	\$200,000–500,000	18	34.0	17	50
	>\$500,000	1	1.9	1	2.9
Top-ranking PR exec.	Yes	36	64.3	36	64.3
	No	20	35.7	20	35.7
Gender	Male	34	60.7	21	58.3
	Female	22	39.3	15	41.7
Report to CEO	Report to CEO	10	17.9	9	25
	Report to someone who reports to CEO	30	53.6	20	55.6
	Report to someone who reports to someone who reports to CEO	11	19.6	4	11.1
	Other	5	8.9	3	8.3
Department	Public Relations	12	21.4	4	11.1
	Corporate Communications	32	57.1	21	58.3
	Marketing	6	10.7	5	13.9
	Finance and Administration	2	3.6	2	5.6
Write performance appraisals	Other	4	7.1	4	11.1
	Yes	44	78.6	30	83.3
Last performance rating	No	12	21.4	6	16.7
	Minimally successful	1	1.8	1	1.8
	Fully successful	13	23.6	8	22.9
	Exceeds fully	23	41.8	13	37.1
	Outstanding	18	32.7	13	37.1

3. Results

3.1. Response rate

The total number of responses, complete and partial, was 80 for a response rate of 3.5%.

3.2. Respondents

Respondents were older ($M = 48.40$, $SD = 8.676$), white (91.1%) male (60.7%) college graduates (100%). Most (71.4%), had been in their jobs 5 years or less, were managers (78.6%) paid more than \$100,000 (79.2%), worked in Corporate Communications departments (57.1%), reported to the chief executive officer or the next level down (71.5%), and recently had received positive performance ratings (98.2%), as shown in Table 1. Almost two thirds (64.3%) were the top-ranking public relations executives in their *Fortune 1000* corporations, which was the original target population of this study, and more than half (58.3%) of those were males.

3.3. Results of the RQ1

Two-thirds of respondents (66.3%) reported that their organization had an anonymous communication channel to the audit committee of the board of directors. One-fifth (21.4%) played a role in developing the Sarbanes–Oxley whistleblowing channel, while almost two-thirds (63.1%) played a role in publicizing it.

3.4. Results of the RQ2

Almost half (44.4%) of those responding reported that they or someone they knew was aware of wrongdoing. Two-thirds (65.6%) of those who knew about wrongdoing reported it.

3.5. Results of the RQ3

Four-fifths (81%) of those who said they or another person had reported wrongdoing said reporting wrongdoing was not part their job duties or the other person's job duties.

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3.6. Results of the RQ4

Public relations executives who blew the whistle did so almost exclusively through internal channels (95%), and almost two-thirds of those used internal chain of command channels rather than anonymous whistleblowing channels (61.9%).

3.7. Results of the RQ5 and RQ6

Of those who reported wrongdoing (either the respondent or someone he or she knew to have reported), seven (33.3%) experienced retaliation as defined in this study. Of those, only one female reported personal retaliation. The gender of the third party was not asked.

4. Discussion

4.1. Response rate

Noting the difficulty of conducting whistleblowing research, management whistleblowing scholars have encouraged other whistleblowing researchers to use a variety of methodological approaches, as long as they identify the limitations of those approaches when reporting their research (Miceli, Near, & Dworkin, 2008). In anticipation of a low response rate, this researcher chose to use a census of her target population, rather than a random sample.

The low response rate may be due to the fact that a contact list for the target population, public relations executives in the *Fortune 1000*, is not available; that response rates for Web surveys are trending down (Couper, 2000); that lower responses rates are found in surveys directed at corporate executives (Baruch & Holtom, 2008); that organizations sometimes filter e-mail messages (Hill, 2011); or that a recent U.S. Supreme Court ruling allows public employers to read employees' text messages (Renner, 2010). "The bottom line for whistleblowers is that they should not conduct whistleblowing or other personal business on computers, phones or other devices provided by their employers" (Renner, 2010).

The low response rate also could be attributed to the sensitivity of the subject matter. "Whistleblowing deals with very sensitive issues from both the individual and the organizational perspective. Such sensitivity limits easy access to information and prevents the use of traditional methodological approaches" (Keenan, 2000, p. 200). The sensitivity of the subject matter has been shown to affect researchers' ability to sample whistleblowers directly and has led to studies of hypothetical whistleblower attitude or intention, which have been found to be poor predictors of whistleblowing action (Mesmer-Magnus & Viswesvaran, 2005).

Although the response rate (3.5%) was low, it was comparable to the rate (4.02%) reported by Kang and Berger (2010) in their random sample survey of the membership of the Public Relations Society of America, and it is within the anticipated 1–30% response rate for Internet surveys (Wimmer & Dominick, 2006).

Demographic characteristics of the sample suggest it is representative of the target population, which is thought to be older, better-educated, and higher-ranking white males (Berger, 2005; Grunig, Grunig, & Dozier, 2002; Near & Miceli, 1996). For that reason, the researcher concludes that the data provide a limited window into a rarely studied subset of public relations practice: public relations executives and practitioners who work for the large corporations that make up the *Fortune 1000* group of companies. Although some researchers have argued that small samples can be representative of the larger population for the purposes of conducting inferential statistics (Churchill & Peter, 1984), this researcher has chosen to report only descriptive statistics, frequencies, and post-hoc Chi-square analyses in order to suggest trends and areas of interest for future research.

4.2. Respondents

Post-hoc Chi-square analyses revealed significant differences between the older (46–64) and younger (31–45) age group for salary, supervision, tenure with the company and department in which the respondent worked within the company. Executives in the older age group were significantly more likely to earn \$200,000–500,000 ($\chi^2(3, N=49)=14.108, p<.01$), to supervise others ($\chi^2(1, N=50)=6.487, p<.05$), to have been with the company more than 10 years ($\chi^2(1, N=49)=6.004, p<.05$), and to work in the Corporate Communications department ($\chi^2(4, N=50)=9.600, p<.05$), rather than in Public Relations, Marketing, Finance & Administration or Other departments.

Chi-square comparison of the top-ranking public relations executive variable with other demographic variables found only that top-ranking public relations executives were paid significantly higher salaries than other respondents ($\chi^2(3, N=53)=12.457, p<.05$). The work location of top-ranking public relations executives in Corporate Communications departments approached significance ($\chi^2(4, N=56)=9.314, p=.054$).

4.3. RQ1

RQ1 showed that public relations professionals are more likely to publicize (63.1%) the Sarbanes–Oxley whistleblowing channels than to develop (21.4%) them. The area in a corporation most likely to have responsibility for developing and publicizing Sarbanes–Oxley-mandated whistleblowing channels was not specified by law. The communications director

for a whistleblowing advocacy organization identified human resources, legal and executive management departments as the areas most likely to have responsibility for developing those whistleblowing channels (D. Blaylock, Government Accountability Project, personal communication, March 10–11, 2010). However, in order to explore public relations' roles, the researcher was interested in asking what role public relations executives had played in the development of and publicity for those channels.

4.4. RQ2

To report wrongdoing, respondents must first be aware of it. RQ2 asked how many respondents knew of wrongdoing and how many reported it. Almost half of respondents (44.4%) said they or someone they knew was aware of wrongdoing, and one-fifth (21.5%) said they were aware of wrongdoing in their own corporations. Top-ranking public relations executives were significantly more aware of wrongdoing personally and through others ($\chi^2(1, N = 56) = 4.857, p < .05$) than other respondents. However, the numbers were small.

The tradition in management literature is to use Total Awareness of Wrongdoing as a surrogate for the amount of illegal, unethical, or wasteful activity in the environment. The practice is to calculate Total Awareness of Wrongdoing as the number of respondents who knew about wrongdoing, divided by the total number of respondents.

In this study, the researcher calculated Total Awareness of Wrongdoing as the number of respondents who knew someone who knew about wrongdoing, or who knew of wrongdoing themselves, divided by the number of respondents. Prior federal studies that asked only about the respondent's personal knowledge of wrongdoing found 45% awareness of wrongdoing in 1980, 25% in 1983, and 18% in 1992 (U.S. Merit Systems Protection Board, 1993), while a more recent worldwide report of corporate fraud found 30% (PriceWaterhouseCoopers, 2009).

Including questions about third-party knowledge of wrongdoing, and the effect on the other person who reported wrongdoing, allowed the respondent to consider the topic in a less threatening manner before considering his or own personal knowledge of wrongdoing. Including open-ended questions also allowed the following comment: “[The] episode I am thinking of is not SOX [Sarbanes–Oxley] related but manager-level ethical issues involving money. Whistle-blowing was done during exit interviews and ASAIK [as far as I know] no action was taken. I left that company at my earliest opportunity.”

Several respondents took advantage of the open-ended questions to offer comments about the ethical values of their companies. One commented: “By and large, ethical behavior rules. I have not witnessed any unethical actions.” Another said: “We have signs posted in our buildings to make sure that team members understand how important [sic] of an issue ethics is.” A third said: “Ethics and ethical behavior is a core value of our company. All employees are educated to report ethical violations immediately, either to their supervisors or to the compliance officer for their business unit.” A fourth said: “I’ve worked in PR for 41 years for two Fortune 500 companies. Both had very ethical management.” And a fifth said: “We have annual Code of Conduct training—all employees must participate.”

4.5. RQ3

The overwhelmingly negative response (81%) to RQ3 suggests that public relations executives do not see reporting wrongdoing as part of their job. This could call into question how they view their role as advisers and counselors to management; it could mean they do not have reporting as a requirement in their job descriptions, as do internal auditors or governmental mandatory reporters, who are required by law to report certain types of wrongdoing; or it could be that they do not operate with a knowledge of the broader definition of whistleblowing used in this study.

In support of the latter supposition, one respondent noted, “Involvement of PR people was BECAUSE of their role, not as the person observing or reporting. . .remember, in this position we are involved in addressing and/or managing almost every incident of this nature.”

4.6. RQ4

Answers to RQ4 showed that public relations executives who blew the whistle did so almost exclusively through internal channels (95%), and the one who reported wrongdoing through an external channel referenced providing information to the media as a necessary part of his job duties. Top-ranking public relations executives' use of internal communication channels to report wrongdoing approached significance ($\chi^2(3, N = 11) = 7.639, p = .054$). These findings support earlier studies by Berger (2005), Berger and Reber (2006), and Kang, Berger, and Shin (2012) that found little support among public relations practitioners for external whistleblowing or leaking.

4.7. RQ5 and RQ6

RQ5 questioned the level of retaliation for whistleblowing experienced by public relations executives, and RQ6 asked if female whistleblowers experienced more retaliation than males. Retaliation can only be reported for someone who was identified as the source of the report of wrongdoing. Of the 21 individuals who reported how they or others reported wrongdoing, one-third (33.3%) suffered retaliation as defined in this study. Of those, three reported that their supervisor was unhappy with them, and two reported that someone above their supervisor was unhappy with them. As one of the management

researchers reported: “Lack of support from supervisors and management was the strongest and most consistent predictor of . . . retaliation” (Rehg, 1998, p. 120). Kang and Berger (2010) also found that the ethical practices of an organization’s top management were instrumental in determining the ways in which employees chose to deal with unethical organizational behavior.

Although the numbers are small, they indicate that some level of retaliation exists in *Fortune 1000* corporations. The level of retaliation in the federal studies was 20% (U.S. Merit Systems Protection Board, 1981), 23% (U.S. Merit Systems Protection Board, 1984), and 37% (U.S. Merit Systems Protection Board, 1993), but as recent management researchers have noted, “Estimates of the incidence of retaliation against whistle-blowers have varied dramatically (Miceli, Near, & Dworkin, 2008, p. 23).

Of the ten respondents who said they or someone they knew had experienced retaliation, three (33.3%) were female. A post-hoc Chi-square analysis found gender was not significant for retaliation ($\chi^2(2, N = 10) = .816, p = .665$). As Rehg et al. (2008) determined, gender differences are found only with large samples (Rehg, Miceli, Near, & Van Scotter, 2008).

The seriousness of wrongdoing, defined as dollar amount and frequency, has been cited as a predictor of retaliation (Miceli, Rehg, Near, & Ryan, 1999). One-quarter (25%) of the incidents of wrongdoing reported in this study were identified as most serious (involving \$100,000 or more or occurring frequently).

One open-ended comment may provide anecdotal support to the theory that seriousness of wrongdoing predicts retaliation: “I saw fraud while at a public relations agency—saw two senior executives charge time and expenses that were not legitimate.” The respondent reported the fraud was greater than \$500,000 and happened frequently. “One person who committed the fraud was fired. The other was not, and she retaliated against me. I eventually left the firm.”

5. Limitations and Conclusion

The primary limitation of this study is the low response rate. Based on this limitation, the study should be viewed as exploratory. However, it does suggest possibilities for future research.

For example, further research is needed in order to understand public relations executives’ views and experiences about awareness of wrongdoing, reporting wrongdoing through various channels, and their role as advisors to management. As noted, traditional public relations roles could be interpreted as whistleblowing within the broader definition, but this study confirms prior researchers’ results showing that public relations practitioners do not accept this activity as appropriate for public relations.

Further research also is needed to understand the views of public relations practitioners on the topic of codes of ethics, as noted by Kang and Berger (2010). For example, public relations executives’ views about reporting wrongdoing could reflect their interpretation of professional codes of conduct, one of which emphasizes loyalty, as well as service to the public interest (Public Relations Society of America, 2008). This could present a contradiction to practitioners. Future research could examine how public relations practitioners view the twin admonitions of organizational loyalty and service to the public interest.

As noted previously, whistleblowing has been identified as an act of communication, and the admonition by Miceli, Near, and Schwenk (1991) for two-way communication within the organization appears to open the door for public relations executives and practitioners to engage their organizations in discussions about the best way to publicize and encourage whistleblowing within corporations. Disclosure of wrongdoing by employees internally, through accepted channels, be they chain-of-command or anonymous corporate channels, would allow the organization to correct the problem before it becomes an external, public issue requiring public relations’ attention in the form of crisis communication strategies.

Future research should examine whistleblowing in both its narrower and its broader aspects through a combination of quantitative and qualitative approaches designed to increase the response rate, including surveys sponsored by communication membership organizations, surveys directed at individual corporations, surveys directed at specific job categories, and surveys directed in specific geographic areas, including other countries, as well as focus groups and personal interviews conducted wherever access can be obtained.

Despite the inherent difficulties in studying whistleblowing, the effort needs to be made because of the importance of the issue to organizations and to society. Wrongdoing and retaliation for reporting wrongdoing continue, despite legislation, such as Sarbanes-Oxley, that is designed to prevent it. Wrongdoing also can occur when erstwhile whistleblowers report inaccurately, inappropriately, or for reasons other than correcting wrongdoing.

This study has brought the whistleblowing research from the management literature into the field of public relations and has demonstrated the relevance of the prior management research to the more recent public relations research on public relations roles, dissent and leaking. It also opens the door for future research on whistleblowing and internal communication, crisis communication, and ethics. Researchers in public relations who are interested in whistleblowing should be comforted and concerned to know that the opportunities for research into wrongdoing, whistleblowing, and retaliation present an extensive and fertile field of new endeavor that should continue for the foreseeable future.

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