



KPMG whistle blowing survey report

April 2020



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Key highlights

Access to a whistleblowing hotline



A whistleblowing hotline is a fundamental tool for fraud prevention, detection and reporting unethical issues. It plays a critical role in accountability and governance in organisations.

- 59% of respondents do not have a whistleblowing hotline in their organisation
- The Public Sector accounted for 13% of respondents from organisations without a whistleblowing hotline
- 66% of respondents without a whistleblowing hotline have observed unethical behaviour and out of this, a low percentage of 37% reported the issue; mainly to a manager
- Respondents in organisations with whistleblowing hotlines or channels available to external parties received more whistleblower reports.

Unreported issues



Every organisation is vulnerable to fraud and misconduct and such unethical behaviours can have an adverse effect on employees and the organisation itself.

- 59% of respondents witnessed unethical behaviours but did not report
- Nepotism, favouritism, discrimination and misappropriation of asset were the top unethical issues witnessed that were not reported

Reporting channels, reminders and training



Regular reminders on the existence of a whistleblowing hotline tend to encourage employees and enhance their confidence to report wrongdoing.

- Dedicated email address is the most common medium used by whistleblowers to report issues
- Organisations that issued frequent reminders on the need to report wrongdoing received more whistleblower reports than those that did not do so
- 62% of management stated that they carry out annual training on ethics, compliance, anti-bribery and corruption for their staff members

Reasons for not reporting issues



Most people witness different forms of wrongdoing but often remain silent. 43% of staff members with a whistleblowing hotline stated they witnessed unethical behaviour but did not report the issue.

- Lack of trust and the perception that no action will be taken were the top two reasons given by staff members for not reporting issues
- Management believes that staff members are not blowing the whistle due to fear of victimisation (21%). However, fear of victimisation accounted for 14% of the reasons given by staff members

Introduction



Background

“The world suffers a lot not because of the violence of bad people but because of the silence of good people”, Napoleon Bonaparte. Most people witness different forms of wrongdoing within the corporate environment but often remain silent, indifferent or conclude that nothing can be done to stop the problem.¹

Foreign regulations like the Sarbanes-Oxley Act (SOX) requires publicly traded firms to provide anonymous whistleblowing channels to employees. However, that is not the case in Ghana. The Whistleblower Act 720, Act 2006 of Ghana does not make it mandatory for public interest entities such as financial institutions to provide a whistleblowing hotline for stakeholders. Nonetheless, it does provide some protection for people who blow the whistle. Despite the protection it offers, most people do not blow the whistle.¹

The reasons people do not blow the whistle according to the study “Why People Refuse to Blow the Whistle in Ghana”² are fear of harm towards whistleblowers, dismissal, suspension, transfer against will, intimidation, harassment and spiritual attack.

According to a recent study³ (2018), by the Association of Certified Fraud Examiners (ACFE), the most common detection method for fraud are reports from whistleblowers. Whistleblower reports accounted for 40% of all detection methods for fraud in organisations. The role a whistleblowing hotline plays in fraud risk management cannot therefore be overlooked and organisations risk losing funds if employees are not empowered to blow the whistle on wrongdoing.

KPMG undertook this study to understand how organisations use whistleblowing facilities, and how management and staff perceive this valuable tool for improvement in governance, transparency and accountability. The survey also inquired from respondents on reasons for not blowing the whistle or exposing misconduct.

The survey was conducted in the latter part of the year 2019. Respondents from various sectors and industries in Ghana completed a detailed questionnaire based on the whistleblowing culture and policies in their respective organisations. This study is intended to help organisations understand the whistleblowing culture in Ghana and why most employees do not blow the whistle. Institutions and society at large have a unique opportunity to reflect and leverage on the outcome of this survey to improve their governance and control systems.

1 - Ghana Anti-Corruption Coalition (2010), *A Guide to Whistleblowing in Ghana*

2 - Joseph Antwi-Boasiako, Department of Public Administration and Health Services Management, University of Ghana (2018): *Why People Refuse to Blow the Whistle in Ghana*

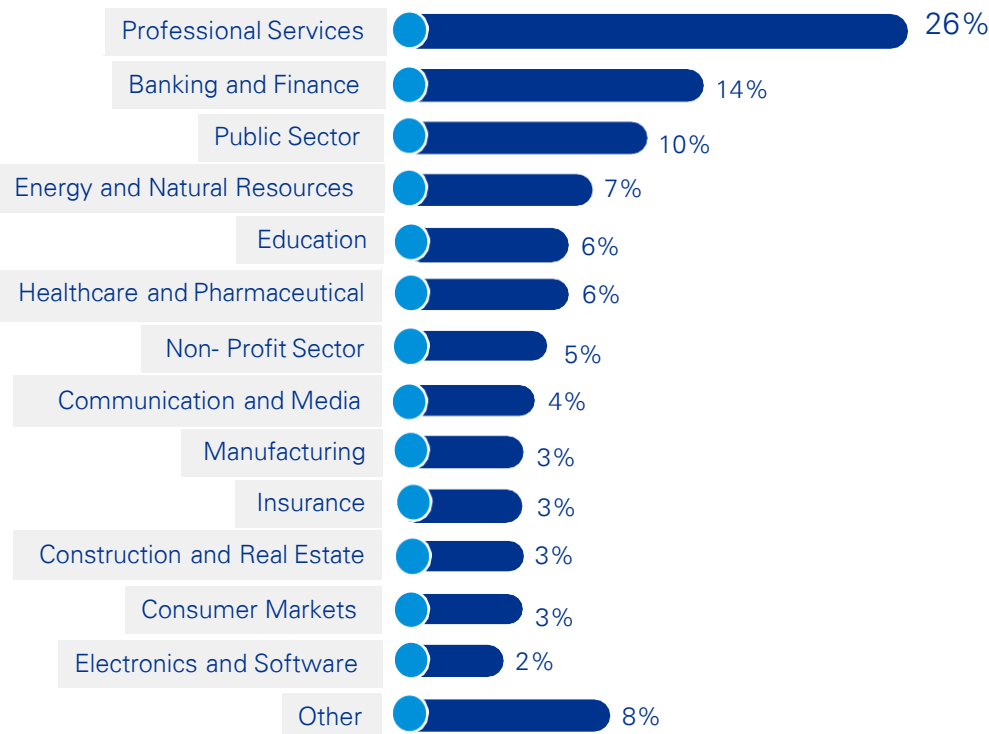
3 - Association of Certified Fraud Examiners (2018), *Report to Nations, Global Study on Occupational Fraud and Abuse*

Profile of respondents

Respondents by sector

In all, we received 210 responses from respondents across various sectors and industries in Ghana. A bulk of the responses came from employees in the Professional Services. The other sectors include agricultural, tourism, maritime, aviation inter alia.

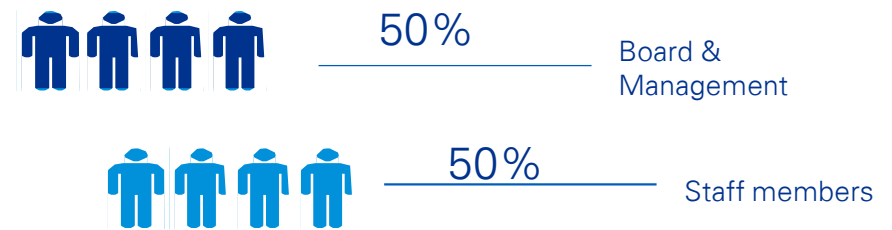
Figure 1: Breakdown of respondents by sector



Respondents by job title

Management from the various organisations demonstrated a keen interest in the survey with half of the responses coming from board members and company management.

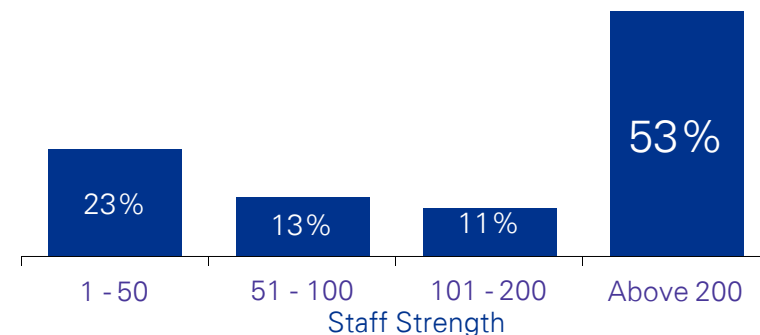
Figure 2: Breakdown of respondents by role



Respondents by staff strength/size

53% of respondents came from organisations with staff strength/size above 200 (larger organisations).

Figure 3: Breakdown of respondents by staff strength/size





Access to a whistleblowing hotline



Organisations without a whistleblowing hotline

A recent study (2018)⁴ by the Association of Certified Fraud Examiners (ACFE) reported that organisations with a whistleblowing hotline are able to detect fraud more often than organisations without a whistleblowing hotline. The report added that 40% of organisations detected fraud from reports given by whistleblowers.

A whistleblowing hotline is a fundamental tool of fraud risk management and detection and its importance in corporate governance cannot be overemphasised. The availability of a whistleblowing hotline enables employees to report wrongdoings, misconducts and expose corrupt practises among others. These can be done anonymously using a whistleblowing hotline.

The survey inquired from respondents whether they had a whistleblowing hotline in their organisation and what alternative channels were being used to report wrongdoing where the organisation had no whistleblowing hotline. We further categorised respondents with no whistleblowing hotline into their relevant sectors.

Figure 4: Do you have a whistleblowing hotline in your organisation?



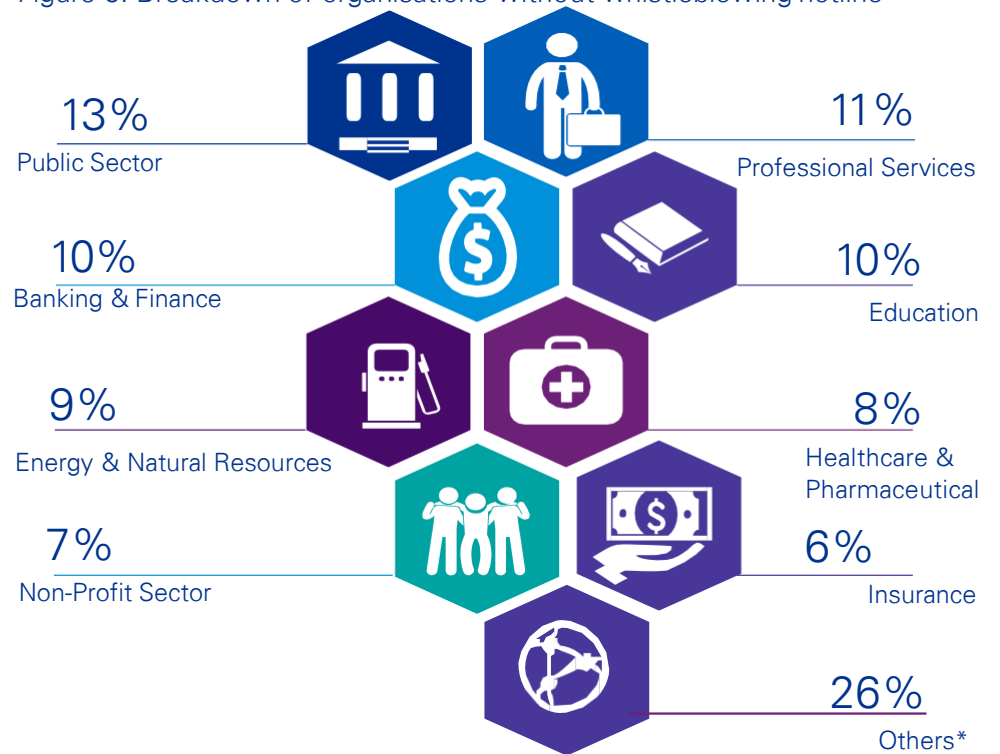
59% of those that completed the survey reported that their organisations had no whistleblowing hotline. This may be because most organisations either do not understand the importance of a whistleblowing hotline, deem establishing and maintaining whistleblowing hotline to be costly or

associate whistleblowing with negative connotations such as victimisation, intimidation and the like.

Breakdown of organisations without whistleblowing hotline

13% of respondents without a whistleblowing hotline came from the public sector. The financial services with Banking and Finance on one hand and Insurance on the other, accounted for 16% while Professional Services accounted for 11%. The results for the financial services sector and professional services were rather disconcerting given that the two sectors are highly regulated in Ghana.

Figure 5: Breakdown of organisations without whistleblowing hotline



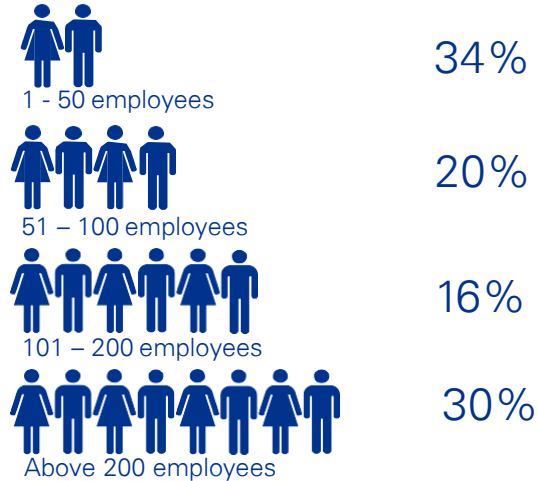
4 - Association of Certified Fraud Examiners (2018), *Report to Nations, Global Study on Occupational Fraud and Abuse*

* - The other industries include Construction and Real Estate, Communications and Media, Manufacturing, Consumer Markets, Electronics and Software

Organisations without a whistleblowing hotline

Organisations without whistleblowing hotline – Staff strength/size

Figure 6: Organisations without whistleblowing hotline



34% of respondents from organisations with smaller staff strength (1- 50 employees) stated that their organisation had no whistleblowing hotline. Perhaps, this can be attributed to smaller organisations having a more informal environment which builds trust among colleagues. This encourages an open culture where reports may be made without a whistleblowing hotline. Additionally, with limited resources smaller organisations may encourage informal reporting mechanisms and rather divert the funds for establishing and maintaining a whistleblowing hotline towards other business initiatives.

Given that a whistleblowing hotline is an essential tool in fraud prevention and detection, 30% of respondents from organisations with employees above 200 stating the absence of a whistleblowing hotline in their organisation is rather worrying. This is because organisations with a large employee base are more susceptible to fraud activities that go undetected for extended periods.

5 - Expolink Europe Ltd (2019), *Client Insights Report 2019*

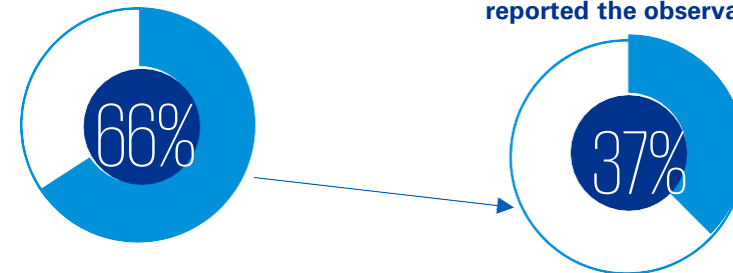
Respondents with no whistleblowing hotline that reported an issue

Employees from organisations without a whistleblowing line may remain silent if they observe unethical behaviour for fear of recrimination. We sought to determine the percentage of respondents with no whistleblowing hotline in their organisation but reported an issue.

Figure 7: Respondents with no whistleblowing hotline that reported an issue

Respondents with no whistleblowing hotline that observed unethical behaviour

Respondents with no whistleblowing hotline that observed unethical behavior and reported the observation



66% of respondents in organisations without a whistleblowing hotline stated they observed unethical behaviour. Out of those who observed unethical behaviour, a smaller percentage (37%) reported the issue to mainly a manager or a colleague (*As evident in Figure 8: Reporting mode breakdown*). The remaining 63% of employees that did not report unethical behaviour could be due to factors such as fear, mistrust and apathy, coupled with lack of anonymous or confidential whistleblowing channel.

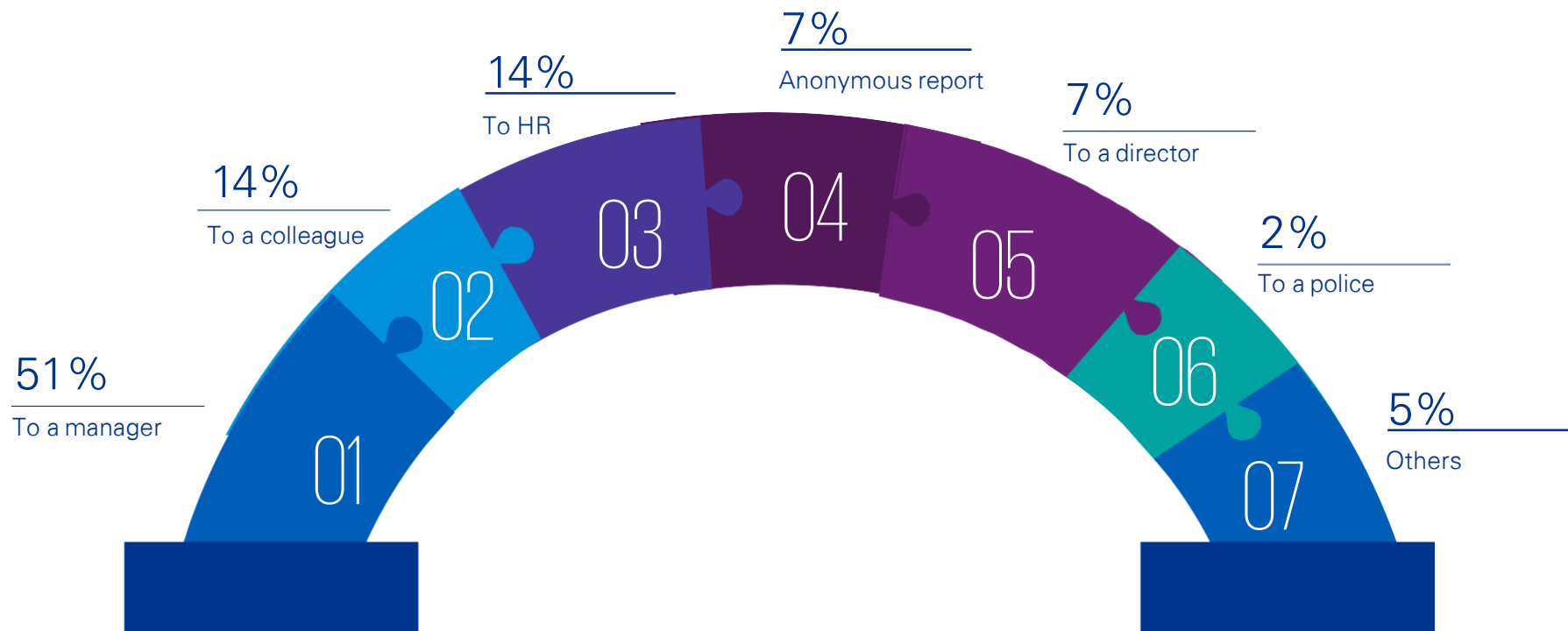
A survey⁵ conducted by Expolink, a whistleblowing firm in the United Kingdom revealed that whistleblowers are often reluctant to speak up if they feel obliged to reveal their identity from the outset. A confidential and anonymous whistleblowing hotline is likely to encourage more employees to blow the whistle.

Organisations without a whistleblowing hotline

Mode for reporting wrongdoing used by the 37% who reported the issue

Further breakdown of the 37% respondents who reported the wrongdoing revealed that 51% reported to a manager while reports made to either a colleague or HR department accounted for 14% each.

Figure 8: Reporting mode breakdown



Availability of whistleblowing hotline to external parties

A recent study (2018)⁶ by the ACFE reported that slightly more than half of all whistleblower reports (53%) were provided by employees of the victim organisations and nearly one-third (32%) of the reports that led to fraud detection came from external parties: customers, vendors, and competitors.

The KPMG survey sought to understand how the availability of the whistleblowing hotline to people outside the organisation (external parties) affect the number of reports received.

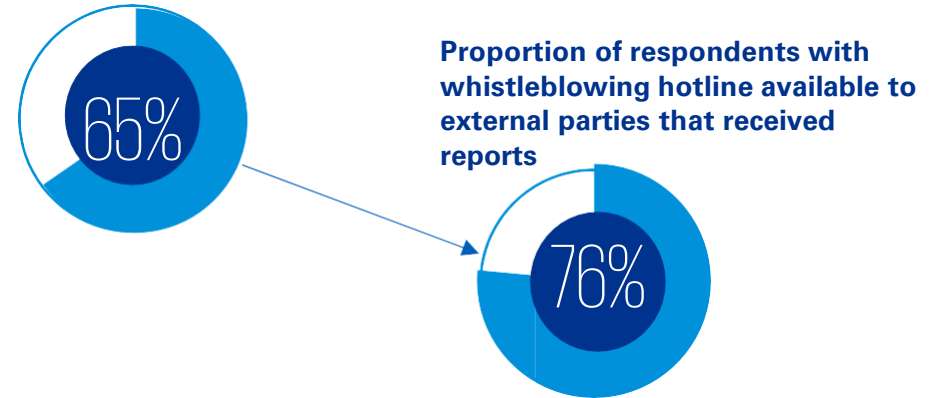
76% of respondents that said their whistleblowing hotline was available to external parties, confirmed receiving whistleblower reports. Conversely, 24% of those whose whistleblowing hotline was not available to external parties received whistleblower reports. This clearly indicates that organisations with whistleblowing facilities available to external parties typically receive more reports than those whose whistleblowing hotline was available to just employees or internal members.

Indeed, earlier studies have indicated that misconduct is often perpetrated in collusion with outsiders. According to the study “Global Profiles of a Fraudster”⁷ 43% of fraud committed was perpetrated by means of collusion between people within and outside the organisation as compared to 35% that was perpetrated by people within the organisation.

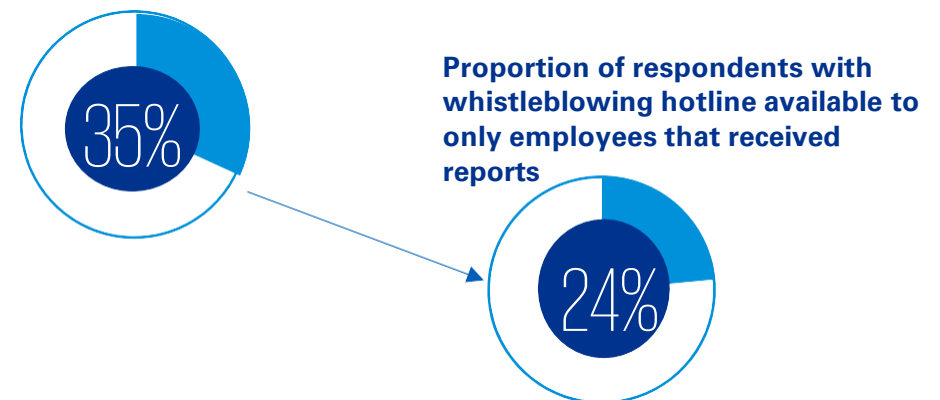
Organisations need to be aware of the possibility that a lone, insider fraudster could work with a sizeable group of people outside. This makes the case for organisations to extend their whistleblowing hotline to external parties to expand the channels for receiving reports from outside the entity and to encourage reports from their customers and other stakeholders.

Figure 9: Availability of whistleblowing hotline to external parties

Respondents with whistleblowing hotline available to external parties



Respondents with whistleblowing hotline available to only employees



6 - Association of Certified Fraud Examiners (2018), *Report to Nations, Global Study on Occupational Fraud and Abuse*

7 - KPMG (2016), *Global profiles of the fraudster*

Actions taken after reports are received

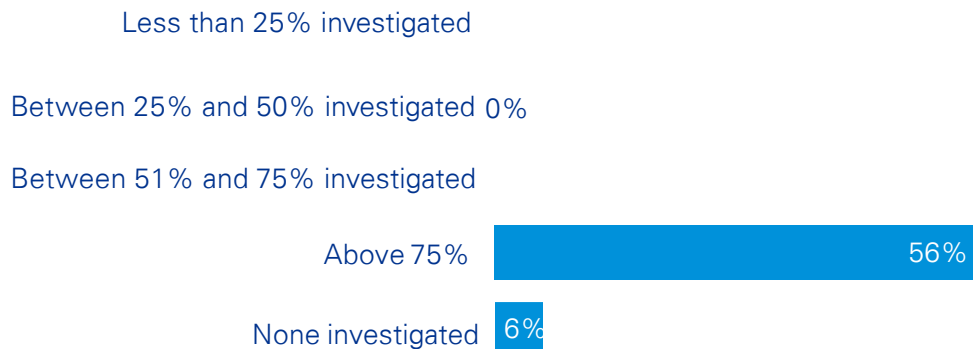
Proportion of whistleblower reports received in the past year that were investigated

Not all whistleblower reports get to be investigated. Most organisations carry out an initial assessment of the whistleblowing reports they receive to ascertain whether to proceed with an investigation. Whatever action an organisation takes on the whistleblower report it receives, the whistleblower should be informed of such actions even if the report is not fully investigated as a matter of good practice.

The survey asked management the proportion of whistleblower reports that were investigated and the actions taken after the investigations.

56% of the respondents stated that above 75% of the whistleblower reports were investigated. This is encouraging as it shows most organisations investigate the whistleblower reports they receive. Only 6% reported that the whistleblower reports received were not investigated. Organisations should keep whistleblowers informed of the status of the investigations as this is likely to motivate people to report more unethical issues.

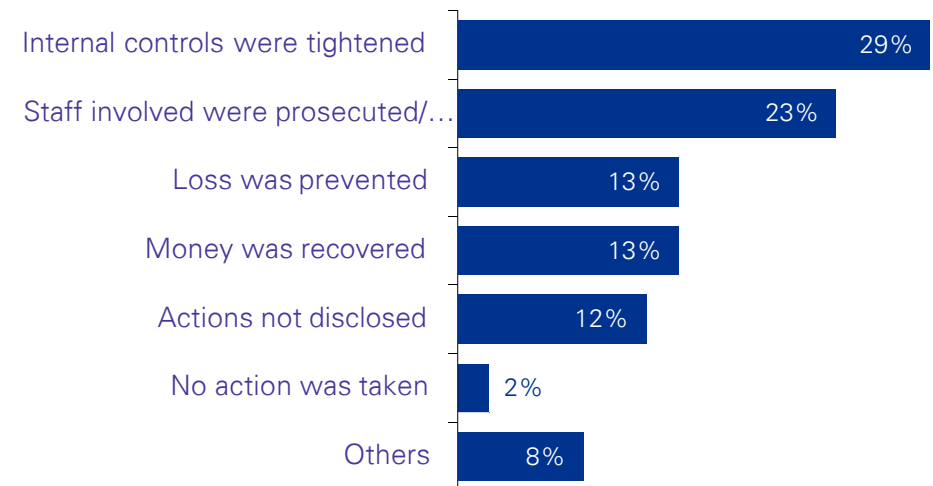
Figure 10: Proportion of reports investigated



Actions taken after the investigations were completed

Actions taken by management after the investigations were completed included tightening of internal controls (29%) and disciplinary actions against employee involved (23%). Only 2% reported no action was taken after the investigation. Most employees may be unaware of the actions taken by management when they blow the whistle. This may be one of the reasons most employees refuse to blow the whistle. Management should be encouraged to give feedback on the remedial actions they take to the whistleblower and at times to all employees where necessary.

Figure 11: Actions taken after investigations



How organisations measure the effectiveness of their whistleblowing hotline

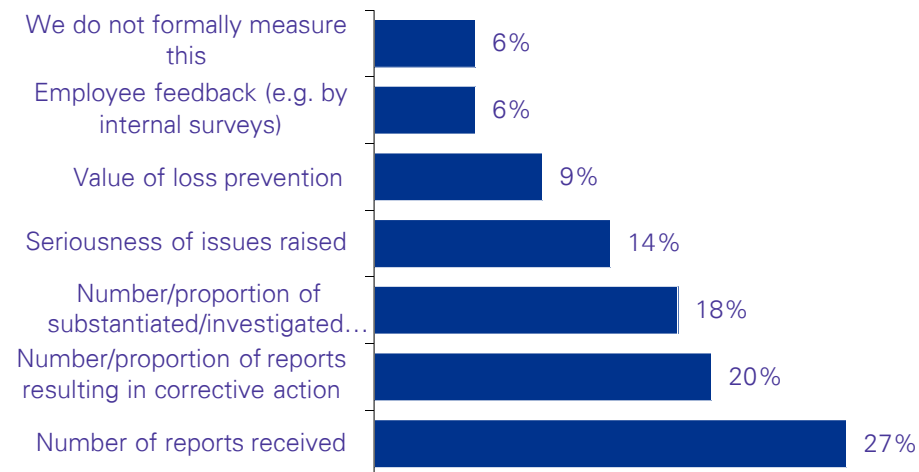
How organisations measure the effectiveness of their whistleblowing hotline

Different elements contribute to the effectiveness of a whistleblowing hotline and it is important that organisations periodically evaluate its effectiveness to assess whether it is operating as intended. This will motivate employees to report suspected acts of wrongdoing.

The survey inquired from management how they measure the effectiveness of their whistleblowing hotline and also asked management to rate the effectiveness of their whistleblowing hotline on a scale from 1 to 5, with 1 being very effective and 5 being not effective.

Most organisations measure the effectiveness of their whistleblowing hotline by the number of reports received (27%). This was followed by 'proportion of reports resulting in corrective action' (20%) and 'number of investigated reports' (18%). Few respondents (6%) mentioned they do not formally measure this.

Figure 12: Measuring the effectiveness of whistleblowing hotline



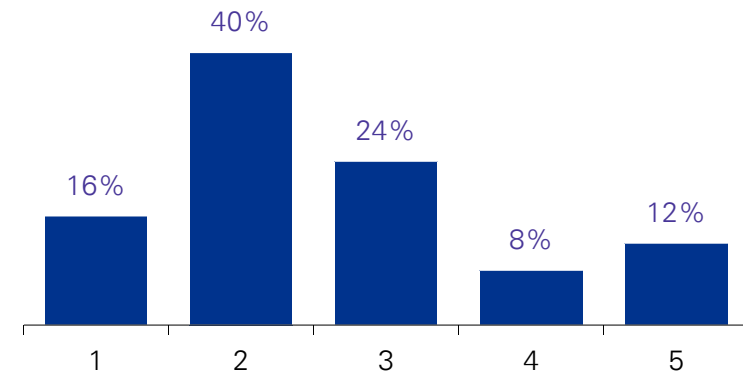
How organisations rate the effectiveness of their whistleblowing hotline

On a scale of 1 to 5, 40% of the respondents rated the effectiveness of their whistleblowing hotline as 2, which is quite impressive. However, the effectiveness of the whistleblowing hotline should not depend only on the 'number of reports received' and 'the proportion of reports resulting in corrective action'. Organisations should also focus on whether their employees truly understand the whistleblowing policy and are aware of the procedures for reporting issues through the whistleblowing hotline.

Only 12% ranked their whistleblowing hotline as not effective (5). This 12% may regard their whistleblowing hotline as ineffective perhaps because they received few or no whistleblower reports.

Figure 13: Effectiveness of whistleblowing hotline

1 – Very Effective
5 – Not Effective





Reasons for not reporting issues

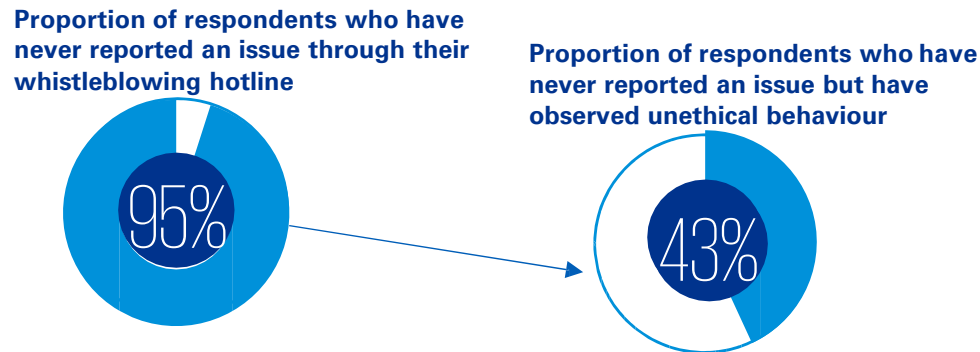


Why employees do not blow the whistle

Most people witness different forms of wrongdoing but often remain silent, indifferent or conclude that nothing can be done to stop the problem.⁸ It could cost an organisation a great deal if employees remain silent on unethical issues they witness.

The survey inquired from staff members why they opted not to blow the whistle even though they witnessed or were informed of unethical behaviour. In addition, management respondents provided reasons, they believe prevent staff members from blowing the whistle.

Figure 14: Proportion of staff members who did not report an issue



95% of staff members revealed that they have never reported an issue through their whistleblowing hotline. Out of this, 43% said they have witnessed unethical behaviour.

On the other hand, the 5% that reported an issue indicated that the issues they reported were resolved in less than 3 months. This should encourage people to report unethical issues as this points to more institutional action on reports brought to their attention.

The survey further inquired from respondents who have never reported an issue but have observed unethical behaviour why they opted not to report the issue. Lack of trust and the perception that no action will be taken were

the top two reasons given, accounting for 20% each. On the other hand, management believes that staff members that do not report observed/suspected unethical behaviour are largely due to fear of victimisation. Interestingly, fear of victimisation accounted for a lower percentage of 10% of the reasons given by staff members for not reporting unethical issues.

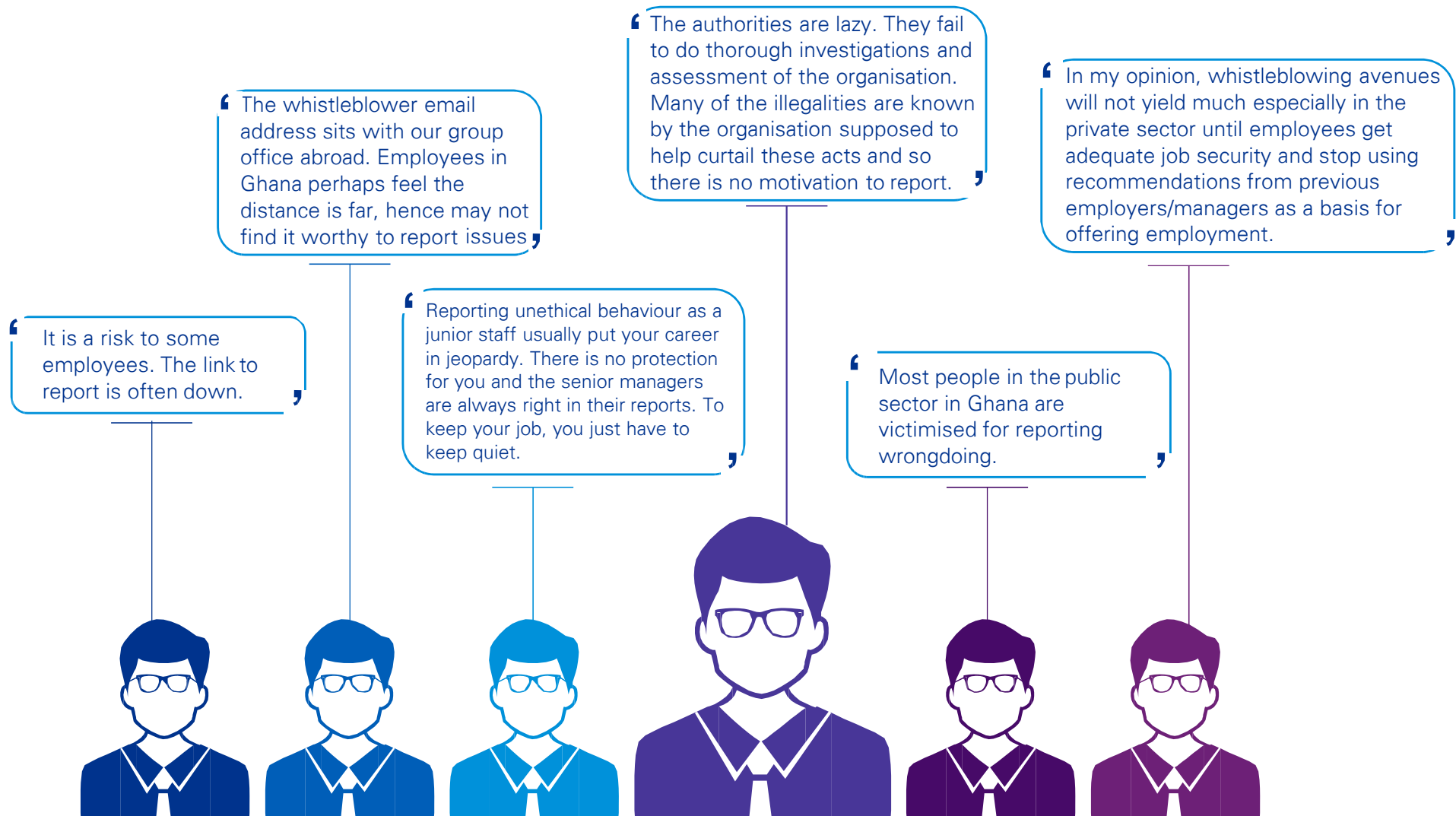
Undoubtedly, both management and staff members agree to a large extent that employees are not reporting wrongdoing because of the lack of trust in the system and the perception that no action will be taken.

Figure 15: Reasons why employees do not blow the whistle



8 - Ghana Anti-Corruption Coalition (2010), *A Guide to Whistleblowing in Ghana*

Some comments on Why employees do not blow the whistle





Unreported issues

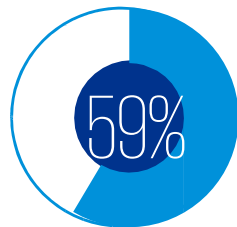


Unethical issues observed but not reported

Every organisation is vulnerable to fraud and misconduct no matter how robust its internal controls may be. Fraudsters who are more senior in an organisation tend to be involved more in collusion which enables them to circumvent controls.⁹ Such misconduct within organisations can have an adverse effect on employees and the organisation itself.

The survey inquired from respondents the nature of unethical issues they observed but did not report.

Figure 16: Respondents who observed unethical behaviours but did not report.



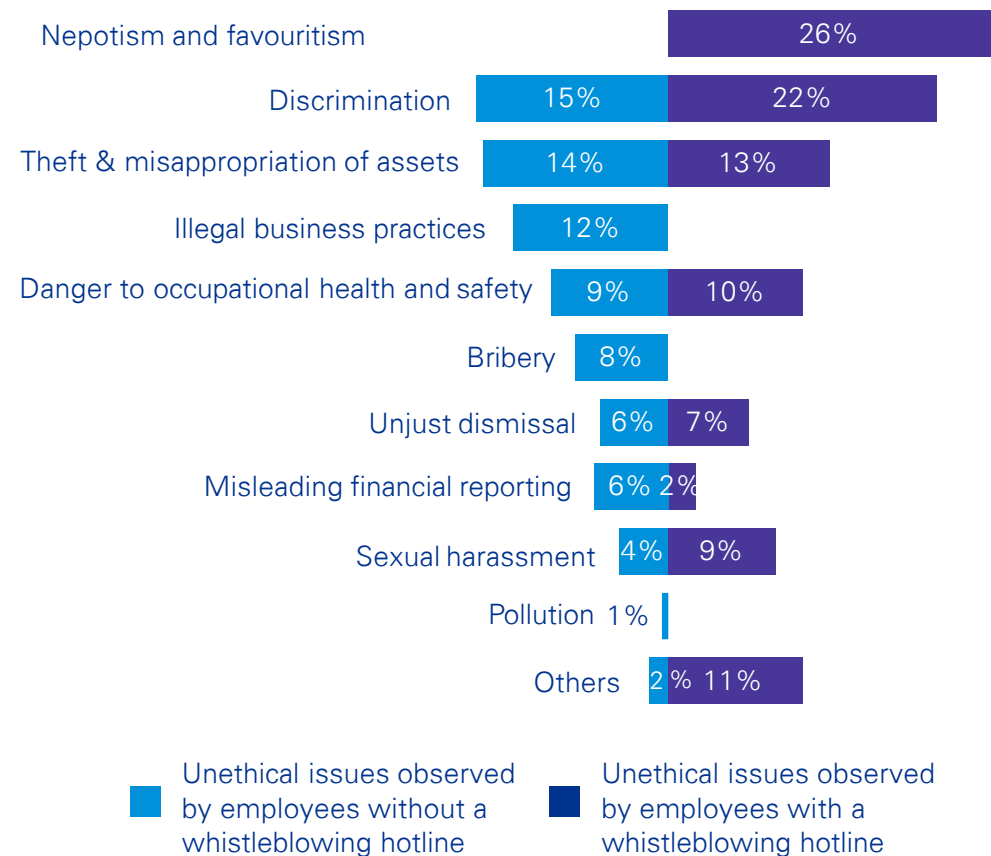
We asked respondents without a whistleblowing hotline and those who have a whistleblowing hotline but never reported an issue, whether they have ever observed unethical behaviour. 59% responded they have indeed observed unethical behaviour.

Nepotism, favouritism and discrimination were the dominant issues observed by respondents. Employees may not report such issues since it is difficult to prove issues of nepotism, favouritism and discrimination. Additionally, such issues may not necessarily constitute fraud even though it can hurt an organisation's reputation and adversely impact staff morale.

What is of more concern here is that employees are not reporting issues of theft & misappropriation of assets. Employees not reporting such issues means organisations are losing funds. According to the Commission on Human Rights and Administrative Justice (CHRAJ), Ghana loses GH¢13.5 billion every year through corruption¹⁰. Some of these losses could have been averted if employees were empowered to report wrongdoing without fear of victimisation.

Additionally, for employees without a whistleblowing hotline, illegal business practices accounted for 13% as issues of unethical behaviour they observed. Organisations indulging in illegal business practices may incur severe sanctions and penalties if such illegal business practises become known to regulators.

Figure 17: Unethical issues observed



9 – KPMG (2016), *Global profiles of the fraudster*

10 – Graphic Online (2019), *We need strong internal processes*. Retrieved from <https://www.graphic.com.gh/daily-graphic-editorials/we-need-strong-internal-processes.html>



Reporting channels, reminders and training



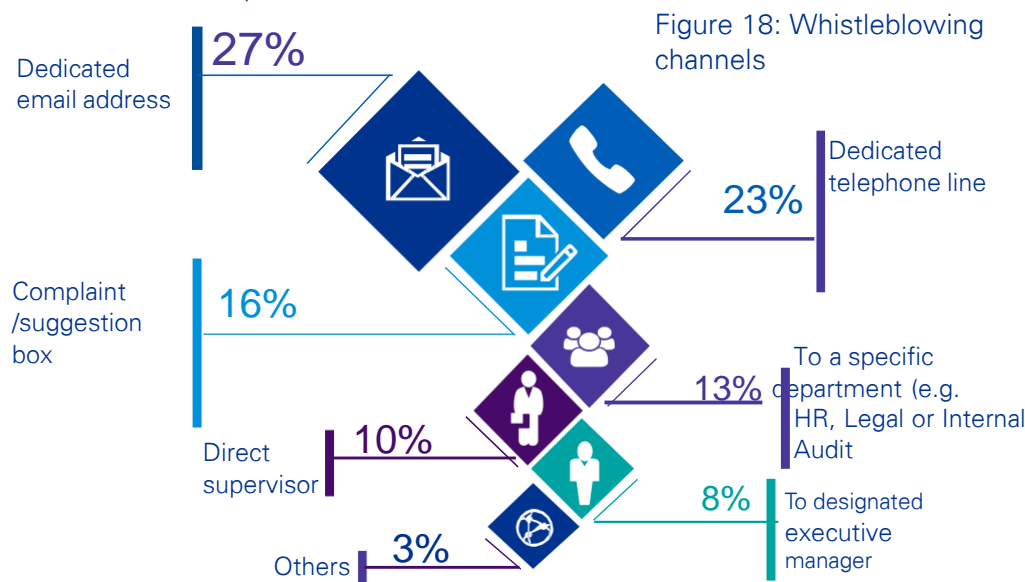
Reporting medium and awareness of the whistleblowing hotline

Medium of reporting

A recent study¹¹ by the ACFE in 2018 reported that telephone hotlines are the most popular means for blowing the whistle. Whistleblowing hotlines must be secured to protect the identities of whistleblowers.

The survey inquired from management the medium whistleblowers use in reporting issues and how the existence of the whistleblowing hotline is communicated to employees.

Respondents indicated that issues of wrongdoing are mostly reported through a dedicated email address (27%), dedicated telephone line (23%) and complaint box (18%). These three (3) ranked highest because it considerably ensures the anonymity of the whistleblower as opposed to reporting to a manager or to a specific department. Whistleblowers should be confident that the medium of reporting will not reveal their identities. Employees may choose to be silent and not speak up against wrongdoing when their identities are not protected.



How the existence of the whistleblowing hotline is communicated

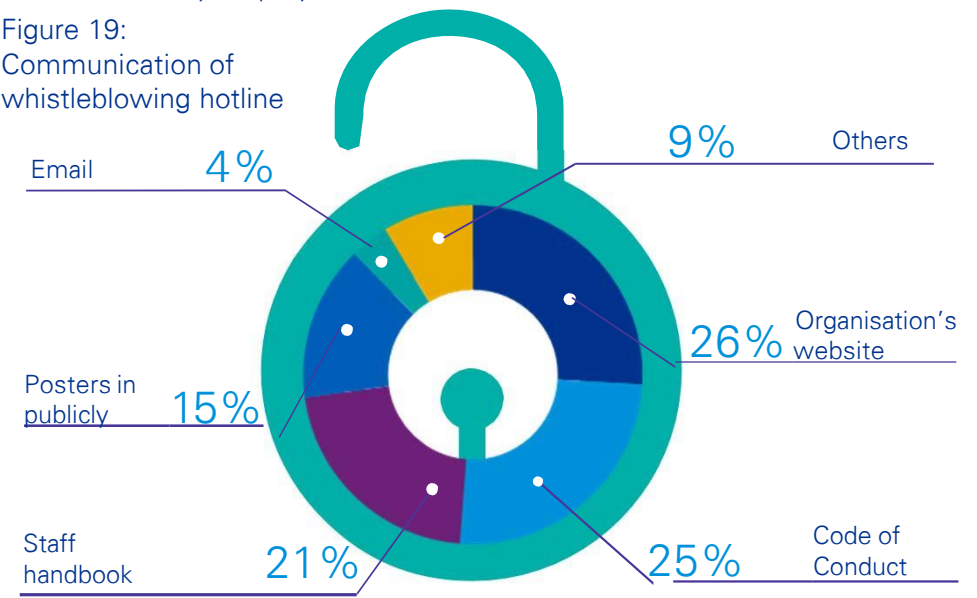
Regular communication on the existence of whistleblowing hotline to employees engenders confidence and contributes to its effectiveness. The means of communicating should not just include the link or hotline to report to, but also information on recipients of the report, the actions that will be taken when the report is received and the need for whistleblowers to follow up on their report.

Most organisations according to our survey communicate the existence of their whistleblowing hotline through the organisation's website (26%) followed by a code of conduct (25%) and a staff handbook (22%).

Organisations that want to receive reports from individuals outside the organisation will mostly publish their whistleblowing hotline on their website since the staff handbook and code of conduct is typically restricted to only employees.

Figure 19:

Communication of whistleblowing hotline



11 - Association of Certified Fraud Examiners (2018), *Report to Nations, Global Study on Occupational Fraud and Abuse*

Reminders on the need to report wrongdoing

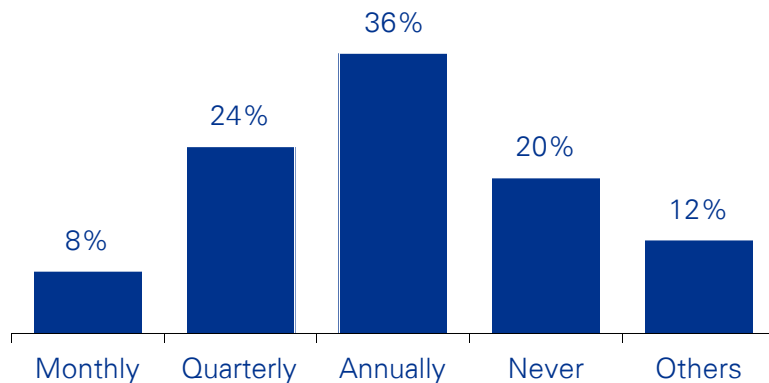
How often organisations issue reminders on Ethics, Compliance, Anti-Bribery and Corruption and the need to report any noted wrongdoing

Reminders on the existence of the whistleblowing hotline assist employees to keep in mind the need to report wrongdoing. Such reminders or updates should also include guidance on how to act right when faced with ethical dilemmas.

The survey inquired from management on the frequency of reminders received from their organisations on the use of whistleblowing hotlines. We further analysed how the frequency of reminders affected the number of reports they received in the past year.

36% of management with a whistleblowing hotline stated they issue reminders annually. This was followed by those who issued reminders quarterly representing 24%. Only 8% reported that they sent reminders monthly. Interestingly, 20% reported that they have never issued reminders on the need to report wrongdoing. We further analysed how the reminders affected the number of reports they received.

Figure 20: Frequency of reminders

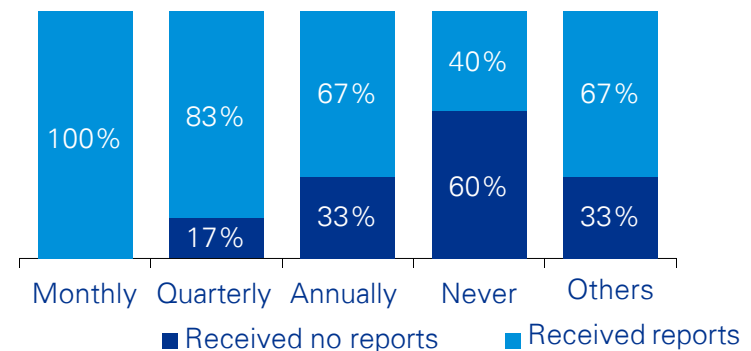


How the frequency of reminders affected the number of reports organisations received last year.

All 8% who issued reminders monthly reported that they regularly received whistleblower reports. This suggests that frequent reminders on ethics, compliance and the whistleblowing hotline help employees to keep in mind the need to report wrongdoing. Additionally, for those who issued reminders quarterly, 83% reported that they received whistleblower reports and for those who issued reports annually, 67% reported that they received whistleblower reports.

As expected, 40% of those who did not issue reminders stated they received whistleblower reports. Employees are likely to overlook the existence of the whistleblowing hotline if organisations do not stress the need for employees to act right and report unethical issues. This can be done by issuing frequent reminders and providing training and advocacy sessions.

Figure 21: Number of reports received



General comments from some respondents

In my view, whistleblowing is a good culture which should be adopted by all organisations. It will enable employees to give honest feedback on their superiors.

Had a discussion with my colleagues and they believe one way or the other whoever blows the whistle will be known. I believe more education should be done in order to create the awareness of whistleblowing and its importance.

Whistleblowing most at times helps in good governance in an organisation.

Series of education should be embarked on to create awareness of the Whistleblowing Act in various organisations before its implementation next year.

We do not encourage anonymous complaints because we are a transparent and accountable organisation and whistleblowers have the assurance of protection firmly instituted in the organisations codes.





Conclusion



Conclusion

Access to a whistleblowing hotline

Most respondents do not have a whistleblowing hotline in their organisation as revealed by our survey. Organisations without a whistleblowing hotline have fewer people reporting unethical issues and such reports are made mainly to a manager if at all.

A whistleblowing hotline is an important element of good corporate governance, as such having a whistleblowing hotline that is managed by a trained professional team promotes accountability, open culture and enhances corporate value.

It is therefore essential that every institution set up a whistleblowing hotline for employees and external parties outside the organisation to enhance control systems and to facilitate reporting of unethical issues.

Reasons for not reporting issues

Most respondents do not blow the whistle as revealed by our survey. This is primarily due to the lack of trust and the perception that no action will be taken. On the other hand, management believes staff members are not reporting issues because of fear of victimisation.

An independent or confidential whistleblowing hotline will demonstrate an open and honest culture where employees can report wrongdoing without fear of victimisation. Additionally, whistleblower reports received must be evaluated in a timely manner and investigated by a professional and independent team as needed. This will restore trust and engender confidence in employees regarding whistleblowing and transparent governance and culture. Management is also encouraged to give feedback and keep whistleblowers and employees informed on the actions they take on the whistleblower reports.

Unreported issues

A considerable number of people witness unethical behaviours but opt not to report. The survey revealed that the top issues not being reported are nepotism, favouritism, discrimination and misappropriation of asset. Even though issues like nepotism and discrimination do not necessarily constitute fraud, they can facilitate same and have an adverse effect on staff morale and a company's reputation.

Reporting channels, reminders and training

Most whistleblower reports are received through a dedicated email address as it relatively ensures anonymity and confidentiality. A whistleblower can create a pseudo email address and file the report confidentially. Organisations that sent out reminders on their whistleblowing hotline also received more reports.

Employees should be trained at least annually on ethics and compliance and the need to report wrongdoing. Additionally, frequent reminders and advocacy are encouraged to engender confidence and encourage the reporting of wrongdoing and misconduct.

Observations of the Whistleblower Act 2006, Act 720

The whistleblower Act of Ghana has certain limitations which should be addressed by stakeholders. We re-examined the whistleblower Act of Ghana based on the findings of our survey.

Section 1 of the Whistleblower Act defines the improprieties a person can report to the areas below:

- Economic crime
- Breaking the law
- Miscarriage of justice
- Misappropriation/ mismanagement of public resource
- Environmental degradation
- Health and Safety

Issues outside these areas may not be applicable to the Act. Our survey revealed that the other significant issues people are not reporting include nepotism, favouritism and discrimination. A Whistleblower should be able to report all forms of impropriety which have been committed, is about to be committed or is likely to be committed.

Best practice requires that anonymity is granted where needed to give whistleblowers confidence that they will not be victimised. The Act however requires full disclosure of name, address and occupation when lodging a concern. The anonymity and confidentiality of the whistleblower or any person who has witnessed and reports the commission of impropriety is therefore not secured.

The top three modes for receiving whistleblower reports as revealed by the survey are dedicated email address, dedicated telephone line and complaint/suggestion box. This is because these modes of reporting often provide anonymity and confidentiality of the identity of the whistleblower.

Additionally, the Act is heavily skewed towards whistleblowing in the public sector and is not very clear in its application to the private sector and non-public interest situations. Specifically, publicly traded institutions and others of public interest should be mandated to institutionalise whistleblowing to help secure and engender trust and confidence in stakeholders.



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