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**The enactment of a whistleblowing framework as an accountability  
mechanism to suppress fraud and wrongdoing: a processual  
approach to the study of practice at the Qatar Financial Centre  
Regulatory Authority (QFCRA)**

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## Abstract

This study explores the whistleblowing processes within the Qatar Financial Centre Regulatory Authority (QFCRA), offering reflective insights into their emergence, development, and impacts. The study utilises a qualitative case study approach, drawing upon in-depth interviews, document analysis, and observations. The research problem addressed in this study is the gap in understanding the evolution of whistleblowing policies over time and their relationship with trust practices and management control systems. Despite the widespread adoption of whistleblowing policies, there needs to be more knowledge about their development, the factors influencing their effectiveness, and the complex dynamics between whistleblowing, trust, and management control systems. To address this problem, the study adopts Callon's three-phased translation model to analyse the roots and trajectory of whistleblowing, with a specific focus on the QFCRA's efforts to combat fraud and wrongdoing. Guided by three research questions, the investigation comprehensively uncovers the reasons behind the whistleblowing framework's establishment, its performance as an accountability mechanism to fight fraud and misconduct, and the consequences of significant changes within the framework. Through in-depth discussions and analysis, several key findings have emerged, painting a vivid picture of the framework's dynamics and implications within the QFCRA context. Firstly, the study reveals that the whistleblowing framework arose in response to identified issues such as inefficiencies, non-core functions, and waste. Its systematic development was marked by deliberate engagement, trust-building, and iterative refinement of framework statements. Crucially, the selection of trustworthy framework statements relied on a combination of familiarity and confidence in their potential for efficient execution, emphasising the vital role of trust and credibility in its foundation. Secondly, the performance of the whistleblowing framework as an accountability mechanism is closely entangled in the management control system. Transparent reporting, regular monitoring, and systematic evaluation emerge as vital elements behind its success. Acting as a diagnostic tool, the management control system enables the identification and rectification of issues, contributing to the re-establishment of trust and accountability within the organisation. Moreover, the study highlights the profound impacts of significant changes or inconsistencies within the whistleblowing framework. Breaches of commitments have led to disappointment and distrust among stakeholders, intensified by substantial upfront investments during the framework's establishment. In this way, continuous efforts to restore trust and rebuild relationships are necessary, reaffirming the organisation's commitment to whistleblowing practices and emphasising the importance of transparency and accountability. In terms of contributions to the literature, this study represents a remarkable synthesis of a providing a practice perspective and Actor-Network Theory (ANT) integration. By considering interactions between human and nonhuman actors, it challenges conventional views of whistleblowing and enriches our theoretical understanding. Notably, this novel approach highlights the dynamic nature of organisational structures and actions, revealing the complex net of relationships involved in whistleblowing processes. Empirically, this research provides unique insights into the whistleblowing framework within the context of Qatar, a developing country. Through the exploration of specific challenges and opportunities in the QFCRA case, the findings enhance our understanding of whistleblowing practices in practice. Policymakers can capitalise on these insights to fortify whistleblowing policies. Effective communication and awareness strategies are vital to ensure that employees understand the essence of whistleblowing policies and procedures. Collaborating with trusted cultural institutions can facilitate mass mobilisation campaigns, fostering awareness and understanding among employees. Moreover, policymakers should recognise the significance of culture-based transformation in combating fraud and corruption. By integrating indigenous cultural traditions and practices into the organisational framework, trust and accountability can be fostered. Additionally, investments in advanced technologies, such as encrypted channels, can enhance the performance and security of whistleblowing frameworks. While acknowledging the research's limitations, such as contextual specificity and qualitative nature, future investigations can address these gaps to further refine whistleblowing frameworks. The exploration of intersections between management control systems, trust, and whistleblowing processes in different contexts presents exciting avenues for future research. The originality of this study lies in its comprehensive exploration of the interconnections between trust, and management control systems, and whistleblowing within a specific organisational setting. It moves beyond the traditional focus on policy design and control mechanisms to dig into the practices and dynamics that shape whistleblowing processes. By adopting a process-oriented approach, this research offers a fresh perspective on the origins, operation, and impact of whistleblowing policies.

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# 1 Introduction

## 1.1 Overview

Several instances of corporate failures have raised concerns about the ethical standards followed within organisations (Alleyne, Hudaib and Pike, 2013). Whistleblowing policies have been identified as a means to address fraudulent activities (Association of Certified Fraud Examiners, 2020). Therefore, it becomes essential to gain a comprehensive understanding of how whistleblowing is practiced within organisations (Brennan, 2020). Specifically, we need to explore the emergence and execution of whistleblowing practices over time (Langley *et al.*, 2013). Unfortunately, prior studies have only partially explored the dynamic nature of the whistleblowing process (Brown *et al.*, 2014; D’Cruz and Bjørkelo, 2016). Furthermore, these studies fail to fully understand the evolving conceptualisation of whistleblowing processes, practices, and their interrelationships.

This study embarks on a transformative journey to bridge the gap in the literature (e.g., Guthrie, Norman and Rose, 2012; Wainberg and Perreault, 2016; Wilde, 2017) and explore the dynamic nature of whistleblowing practices. Through an in-depth exploration, the study aims to provide valuable insights into the complexities of whistleblowing processes within organisations. By undertaking this journey, we seek to advance our understanding of whistleblowing and contribute to the development of effective policies and practices.

This chapter aims to provide the background, motivation and focus, aims and objectives, and questions of this research. It also presents the research problems—in terms of theory and practice—and promised contributions. Figure 1 illustrates the linkages between the background, focuses, objectives and questions of this study to ensure that it is relevant to the fraud-combating efforts currently undertaken in Qatar.

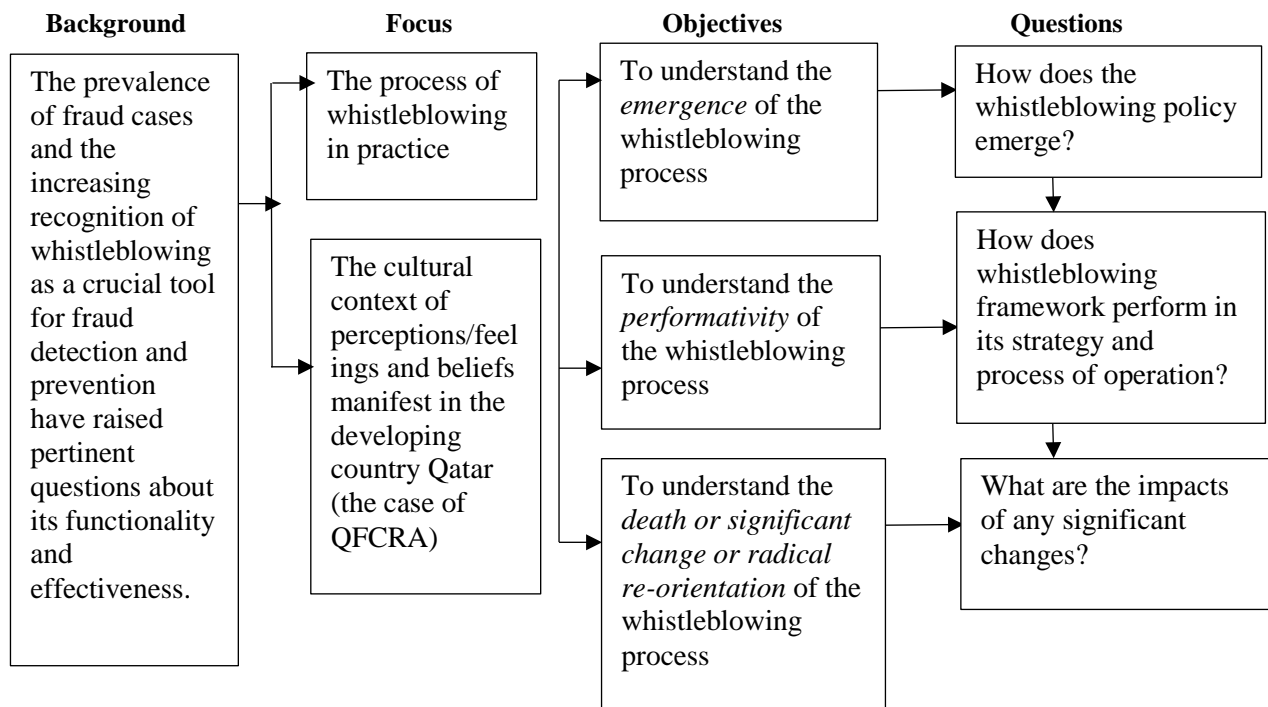


Figure 1: The background, focuses, objectives and questions

## 1.2 Background

In recent decades, a series of massive accounting scandals<sup>1</sup>, starting with the collapse of Enron, have brought unprecedented attention to accounting frauds and prompted concerted efforts to prevent wrongdoing (Wilde, 2017). According to the Association of Certified Fraud Examiners (2020) annual report, corporate fraud results in a shocking total damage of \$4 trillion USD each year across 125 countries. This represents 5% of the Gross World Product, which is equivalent to the combined revenues of France, the United Kingdom, Italy, and Canada (Central Intelligence Agency, 2017). Corruption, as highlighted by Peter Eigen, Chairman and Founder of Transparency International, not only perpetuates poverty but also hinders efforts to overcome it, creating a cycle of misery. To make a real difference in alleviating poverty, corruption must be vigorously addressed (Eigen, 2005). Recent survey findings indicate that fraud and corruption have had a detrimental impact on the provision of healthcare services during the COVID-19 pandemic, exacerbating the high death rate associated with the virus (Milata, 2020).

Fraud and corruption not only result in financial losses but also incur other significant costs<sup>2</sup>. Companies may suffer financial losses due to revenue loss or misappropriation of assets such as cash and inventory (Near and Miceli, 2016). Additionally, businesses may face massive regulatory fines and penalties (Call *et al.*, 2018), along with reputational damage that can lead to stock price volatility, poor operational performance, and legal repercussions (Bowen, Call and Rajgopal, 2010). Organisational wrongdoings stem from pressures or financial incentives, opportunities, and rationalisations to commit fraud (Latan *et al.*, 2018). The Association of Certified Fraud Examiners (2020) report shows that asset misappropriation<sup>3</sup>, corruption<sup>4</sup>, and financial statement fraud<sup>5</sup> have remained at the top of the organisational fraud list for the past 20 years. While asset misappropriation is the most prevalent scheme, it is the least costly, whereas financial statement fraud is the least common but the most expensive scheme (Association of Certified Fraud Examiners, 2020)<sup>6</sup>.

To combat fraud and corruption, whistleblowing has been recognised as a vital tool for detection and deterrence by professional services companies (Association of Certified Fraud Examiners, 2020). Whistleblowing allows for the unveiling of questionable practices within and outside the organisation, aiding in the detection of misconduct and fraudulent activities (Chiasson, Johnson and Byington, 1995). It provides valuable lessons to managers and supervisors about wrongdoing within the organisation (Near and Miceli, 2016).

The importance of whistleblowing as an accountability mechanism has gained traction in detecting and deterring accounting frauds (Guthrie, Norman and Rose, 2012; Okafor *et al.*, 2020). Researchers from various disciplines have studied the promotion and impact of whistleblowing on stakeholders such as whistleblowers, accountants, auditors, professionals, and students (Gao and Brink, 2017; Lee and Xiao, 2018). Regulators also recognise the significance of whistleblowers, particularly in cases of accounting-

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<sup>1</sup> See Appendix 1: Famous whistleblowing stories.

<sup>2</sup> According to Coffin (2003), in the USA, employee fraud has an average yearly cost of more than USD 600 billion; for the UK, that figure is GBP 2 billion (Amble, 2005). A fraud survey conducted by KPMG Forensic indicated that, in the short period between 2002 and 2004, losses caused by fraudulent acts perpetrated in Australia and New Zealand amounted to about AUD 450 million. The survey also revealed the variety of fraudulent acts committed, which included asset theft, financial reporting fraud, and bribery. Besides, the survey showed that most perpetrators were employees and that almost 67% of the fraudulent acts reported had been committed by staff at the management level (Rae and Subramaniam, 2008).

<sup>3</sup> A scheme in which an individual steals or misuses the resources of the employer agency (e.g., client cash theft, false accounting schemes or exaggerated expense reports) (Association of Certified Fraud Examiners, 2020).

<sup>4</sup> A scheme where an individual misuses their power in a commercial process in a way that breaches the employer's obligation to obtain a direct or indirect gain (e.g., bribery schemes or conflicts of interest) (Association of Certified Fraud Examiners, 2020).

<sup>5</sup> A scheme where an individual deliberately makes an error or omits substantive material from the company's financial records (e.g. reporting fake sales, understating actual costs, or falsely inflating recorded assets) (Association of Certified Fraud Examiners, 2020).

<sup>6</sup> Asset misappropriation was the most prevalent scheme (86% of the cases), it was least costly (average about 1.2 million USD per case). On the contrary, financial statement fraud was the least common (10% of the cases); however, the most costly scheme (nearly 8.7 million USD per case).

related misconduct. The Securities and Exchange Commission (SEC) acknowledges that whistleblowers play a crucial role in combating fraud and unlocking complex fraudulent schemes (SEC, 2014, 2015). Similarly, the Qatar Financial Centre Regulatory Authority (QFCRA) emphasises the importance of whistleblowing as a means of early identification of potential wrongdoing (QFCRA, 2017)<sup>7</sup>. Whistleblowing should be a major concern for accounting researchers interested in publicness and accountability, which encompasses the successful accomplishment of public goals, values, and interests throughout society (Quayle, 2021). In an ideal world, companies would not rely on whistleblowers to uncover significant misconduct within their own workplaces (Stolowy *et al.*, 2019).

The rise in fraud cases worldwide and in developing countries (Okafor *et al.*, 2020) and the escalating recognition of whistleblowing policies as an essential instruments for fraud detection and prevention have led to pressing inquiries about their functionality and success. Often, whistleblowing policies do not meet expectations, resulting in widespread reprisals and discontent (Lee and Fargher, 2018). This dilemma undermines the effectiveness of whistleblowing policies (Wilde, 2017). Wolfe and Milliken (2014) highlight that employees hold vital information about an organisation's operations and behaviour, yet a culture of silence persists due to the fear of retaliation. To bridge the gap between the popularity of whistleblowing and its associated high retaliation rates, a profound understanding of the dynamics and evolution of whistleblowing policy is essential. By understanding the dynamic processes of whistleblowing policy in practice since its birth, we can uncover the network outcomes and the underlying structures that contribute to these outcomes (Ahuja, Soda and Zaheer, 2012; Mahama and Chua, 2016). Despite decades of research, there is still limited knowledge about the development and changes within organisational networks and how whistleblowing unfolds (Brown *et al.*, 2014). Consequently, this study seeks to investigate the emergence, development, and substantial transformations of organisational networks engaged in whistleblowing policies as mechanisms for accountability. The focus of this exploration is particularly aimed at the QFCRA's initiatives to tackle fraud and wrongdoing.

### 1.3 Research motivation and focus

Whistleblowing plays a crucial role in reducing accounting fraud by enabling directors to anticipate tighter monitoring, lowering the expected costs of wrongdoing, and serving as an accountability mechanism within organisations (Wilde, 2017; Okafor *et al.*, 2020). However, the role of whistleblowing remains controversial. Despite the presence of whistleblowing hotlines, anti-fraud policies, and other controls, fraud cases continue to rise, as documented in academic literature (Hooks, Kaplan and Schultz, 1994; Ghani, Galbreath and Evans, 2011) and professional reports (Association of Certified Fraud Examiners, 2020). Additionally, regulators recognise that whistleblowing policies often lack the necessary resources to comprehensively evaluate all received leads (Wilde, 2017).

Regulators and policymakers globally have acknowledged the significance of whistleblowing and made considerable efforts to develop policies that facilitate reporting and combat fraud (KPMG Forensic, 2014). However, surveys consistently reveal that most observed frauds go unreported, with employees choosing to remain silent<sup>8</sup> (The Hudson Employment Index, 2005; Miceli, Near and Dworkin, 2008; Ethics Resource Center, 2012, 2013; Wolfe and Milliken, 2014). Fear of retaliation is a key factor preventing individuals from engaging in whistleblowing (Wolfe and Milliken, 2014).

In practice, whistleblowing encompasses three main pillars: reporting through anonymous channels, whistleblower protection, and investigation. While explicit protection of whistleblowers is essential, even anonymous reporting channels can be ineffective, and explicit anti-retaliation policies can evoke fear in

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<sup>7</sup> See Article 16 of the Qatar Financial Centre employment regulations.

<sup>8</sup> Employee tips, including from accountants and auditors, were the most widespread technique for fraud detection (Dyck, Morse and Zingales, 2010; Association of Certified Fraud Examiners, 2020). However, it was also found from varied surveys that not all frauds observed were reported. According to the Ethics Resource Center (2013), 41% of employees found workplace misconduct but among them almost 37% remained silent regarding those events. Uncertainty about the future performance of accountants and auditors in deterring frauds is of concern.



potential whistleblowers (Fasterling and Lewis, 2014; Wainberg and Perreault, 2016). Furthermore, anonymous reports may be taken less seriously, hindering effective investigations (Guthrie, Norman and Rose, 2012). At times, the investigation process may require the identification of the whistleblower, exposing them to potential reprisals or threats. These challenges raise concerns about the effectiveness and performativity of whistleblowing policies, highlighting the need for contextual studies (Brown *et al.*, 2014). Therefore, understanding the process and performativity of whistleblowing policies is crucial in relation to reporting accounting-related misconduct. Accounting-related misconducts are often complex<sup>9</sup>, subjective<sup>10</sup>, and less obvious, making the whistleblowing policy's functional struggles in combating such frauds significant. Therefore, a deeper exploration of the whistleblowing process in practice, particularly involving accountants and auditors, is required (Liyanarachchi and Adler, 2011).

The focus of attention lies on auditors and accountants because the green light from the auditor indicates that the company's accounting practices have successfully passed. The issuance of audit reports is subject to regulatory policies. Auditors may, however, be reluctant to issue a report with "qualify opinion" for fear of retaliation. Regulators blamed auditors during past banking failure because their silence massively hurt depositors and innocent clients (Sikka, 2009). Earlier crises raised concerns about accountants behaviour and failures of conventional auditing systems (Sikka *et al.*, 2007). Given this context, the accountability of accountants in reporting observed frauds becomes important during the whistleblowing process. Accountants, along with auditors, have the expertise and knowledge to identify instances of accounting-related misconduct within organisations (Liyanarachchi and Adler, 2011). Their active participation in the whistleblowing process is crucial for detecting and addressing fraudulent activities, thereby upholding the principles of transparency and accountability in the financial sector.

Whistleblowing policies present difficulties, as highlighted by accounting and auditing professionals who question their effectiveness as an accountability tool (Guthrie, Norman and Rose, 2012; Okafor *et al.*, 2020), and their trust to operate and perform (Vandekerckhove *et al.*, 2016). Prior studies (e.g., Gao and Brink, 2017; Lee and Xiao, 2018) have identified factors affecting internal and external whistleblowing channels but often treated whistleblowing as a predetermined event, overlooking its dynamic nature and complex interrelationships (Langley *et al.*, 2013; Brennan, 2020). In this vein, viewing whistleblowing as an event limits our understanding of its performance and effects. Therefore, assessing the genesis and movements of the structures leading to whistleblowing outcomes is crucial for a comprehensive understanding of the process (Brown *et al.*, 2014; Mahama and Chua, 2016).

The credibility of whistleblowing policies' performance is frequently questioned, and there is general criticism of their effectiveness (Wilde, 2017). Whistleblowing can arise from various motives, including malicious grievances or personal issues, which may impact the reputation of the organisation (Miceli and Near, 1992; Bowen, Call and Rajgopal, 2010; Guthrie and Taylor, 2017; Lee and Fargher, 2018). While the

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<sup>9</sup> Understanding the process of reporting wrongdoing in the accounting context is crucial; this is because different types of wrongdoing lead to different whistleblowing processes (Near *et al.*, 2004). Misconduct related to accounting differs from other forms—such as theft, sexual harassment, safety breaches, or environmental pollution—as it is often less obvious and more complex and usually does not entail any physical damage (Near *et al.*, 2004; Kaplan, Pope and Samuels, 2010, 2011). For example, unlike theft, financial statement fraud can benefit both the organisation and wrongdoer. Financial statement fraud is viewed to be pro-organisational behaviour type and may offer benefits to the company like reporting higher income and bonuses to the manager. Therefore, the organisation may not take any corrective action after obtaining the whistleblowing report (Robinson *et al.*, 2012). Analysis of previous studies revealed that when the organisation's dependence on wrongdoing is high, the intention of reporting the wrongdoing is low as the whistleblower anticipates a weak organisational response to tackle the wrongdoing (Kaplan and Schultz, 2007) and retaliation against the whistleblower (Arnol and Ponemon, 1991).

<sup>10</sup> Accounting standards/principles provide considerable management flexibility in reporting earnings. The subjectivity of accounting interpretation leads managers to use their discretion in increasing or decreasing earnings, serving their own interests. Stolowy and Breton (2004) considered accounting manipulation more generally and distinguished between illegal accounting manipulation (fraud categorised above) and earnings management. Earnings management consists of actions that are within the letter of the law but which effectively mislead about the company's performance. McKee (2005) listed some earnings management activities. Although earnings management seems less shameful than illegal accounting manipulations, earnings management has been used to hide the severe types of wrongdoing that resulted in Enron's collapse (Benston and Hartgraves, 2002). Many of these manipulations are challenging for external parties (e.g. external auditors, investors) to detect and prevent because they are embedded in the organisation's activities (Graham, Harvey and Rajgopal, 2005).

whistleblowing policy should ideally deter fraud, its presence alone does not guarantee the detection and prevention of all frauds (Wilde, 2017). Organisational culture and management's dedication to fraud prevention and deterrence programs play a vital role in sending a strong message to stakeholders about the organisation's anti-fraud stance (Okafor *et al.*, 2020). However, the general perception of whistleblowing policy as an accountability mechanism in developing countries, including Qatar, requires further research.

Developing countries, including Arab states, face significant challenges related to anti-corruption and fraud<sup>11</sup>, and whistleblowing research in these contexts remains limited (Okafor *et al.*, 2020; Onyango, 2021). The scarcity of research on accounting and accountability in developing countries is particularly remarkable, despite the urgent need for solutions to address historical, cultural, and political constraints (Yazdifar *et al.*, 2012; Adams and Larrinaga, 2019; Okafor *et al.*, 2020). Frauds pose significant barriers to financial development and economic growth (Song, Chang and Gong, 2021). Furthermore, the implementation of whistleblowing policies in developing countries is relatively new and lacks experience (Okafor *et al.*, 2020). Public administration in these countries operates within clientelistic political systems, fostering bureaucratic secrecy and influential gatekeepers protecting deep-seated interests. Informal networks safeguard public institution employees, discouraging whistleblowing due to fear of retaliation. Additionally, weak citizen oversight hinders effective whistleblower protection legislation. Widespread corruption further impedes reporting (Onyango, 2021). These challenges highlight the need for comprehensive research and effective measures to combat fraud and promote transparency in these regions. These countries offer substantial opportunities for accounting and accountability research on anti-corruption efforts (Brown *et al.*, 2014; Okafor *et al.*, 2020).

Hopper, Lassou and Soobaroyen (2017) draw attention to the implementation of accounting prescriptions from Western contexts in developing countries, facilitated by external aid-givers like Northern donor government departments and international NGOs. However, this process faces challenges due to contextual differences, lack of government commitment, and the potential for information manipulation. In the realm of whistleblowing framework, its origins can be traced back to Western developed countries and organisations such as the OECD (Onyango, 2021). In developing the draft of the whistleblowing framework, the QFCRA considered a wide range of Western whistleblowing frameworks<sup>12</sup> as a benchmark for best practice guidance. Therefore, understanding these complex dynamics holds significant importance as it provides valuable insights into the complexities of establishing whistleblowing policies within Qatar's unique context.

This study focuses specifically on Qatar, a developing country with a complex political and cultural environment and a concerning record in terms of fraud occurrences (Association of Certified Fraud Examiners, 2018). Accountants and auditors in this region remain hesitant to act as whistleblowers, indicating the importance of understanding the performativity and struggles of whistleblowing within this unique context. The whistleblowing policy in Qatar provides a rich setting to investigate the whistleblowing process from its inception and throughout its implementation. This study contributes substantially by developing more contextually appropriate and effective whistleblowing practices in developing countries, making it a critical endeavour for policymakers and stakeholders.

## 1.4 Research objectives, questions, and contributions

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<sup>11</sup> Frequently ranked among the worst in the world. Only six of the 21 countries in the Arab states have Corruption Perception Index above the world average (34/100) in the 2019, 2020, and 2021 as indicated in the Corruption Perception Index (CPI) reports (Transparency International, 2021).

<sup>12</sup> For example; the Financial Conduct Authority (FCA) in the United Kingdom, the Office of the Superintendent of Financial Institutions (OSFI) in Canada, the Australian Prudential Regulation Authority (APRA) and the European Union as benchmark jurisdictions and the Organisation for Economic Co-operation and Development (OECD)

This study explores the emergence of the whistleblowing framework as an accountability mechanism to combat fraud and wrongdoing, investigates its performativity, and uncovers its impacts within a developing country using a processual approach. The research aims to gain a comprehensive understanding of how the whistleblowing policy unfolds in practice at the organisational level within the QFCRA as an accountability mechanism against fraud and other misconducts. To achieve this, the study digs into the historical development of whistleblowing framework, explores the enactment and instantiation of policies in current practice, and reveals the potential impacts of significant changes in the future.

By viewing whistleblowing as a series of evolving processes influenced by time and context (Brown *et al.*, 2014), this study offers valuable insights for policymakers seeking to enhance their policies and enable accountants and auditors to act more effectively. Unlike prior whistleblowing studies that adopt a variance theorising approach focused on dependent and independent variables for generalisation (Near and Miceli, 1985; Langley *et al.*, 2013), this research acknowledges the centrality of time and aims to address the following question:

*Why and how do organisational networks (processes of whistleblowing policy as accountability mechanism) emerge, develop, and decline or change significantly over time to meet practice at the organisational level in the context of the QFCRA to suppress fraud and wrongdoings?*

Rather than reducing complex interrelationships to mere variables, this case study research digs deeper into these complexities. By exploring real-life situations within their contextual richness, case studies provide a more comprehensive understanding of the emergence and performativity of whistleblowing framework. The study utilises longitudinal data derived from interviews, analysis of archival documents, and observations to develop an in-depth understanding of the whistleblowing practice within the QFCRA context. To address the ongoing debate, the study seeks to answer the following specific research questions:

1. *Why and how does the whistleblowing framework emerge?*
2. *How does whistleblowing framework perform in its strategy and process of operation as an accountability mechanism to suppress fraud and wrongdoings?*
3. *What are the impacts of any significant changes?*

By addressing these research questions, the study uncovers valuable insights and makes significant theoretical and empirical contributions to the field of whistleblowing. The research significantly advances the theoretical understanding of the whistleblowing process by exploring it within its specific context. It offers valuable insights into the struggles and dynamics occurring at both micro and macro levels, thereby contributing to the existing body of knowledge. This in-depth analysis provides a comprehensive understanding of the challenges and complexities inherent in whistleblowing practices. Moreover, the research sheds light on the active role of management control systems in driving the development and implementation of whistleblowing policies. This insight expands our understanding of the intersection between management control systems and whistleblowing, emphasising the importance of management control systems in facilitating effective policy measures. Furthermore, the study expands our understanding of the relationship between management control systems and trust, revealing how trustworthiness is contextually defined and expressed through routine practices. This challenges the notion of trust as a fixed and predefined concept and enhances our knowledge of the complex interplay between management control systems, trust, and whistleblowing.

Empirically, the research contributes by exploring whistleblowing practices within Qatar's cultural context, specifically among regulators, accountants, and auditors. By investigating their beliefs and attitudes towards whistleblowing, the study provides real-world insights into the challenges and dynamics faced by professionals in this region. This fills a critical gap in the literature as empirical research on whistleblowing in Qatar has been limited. This region requires further investigation to understand the unique dynamics of whistleblowing within a governmental entity. The empirical insights gained from this research have

practical implications for policymakers and organisations operating in Qatar. The combination of theoretical advancements and empirical contributions offers a comprehensive understanding of whistleblowing practices in relation to management control systems, trust, and the specific context of Qatar.

## 1.5 Thesis structure

The structure of this thesis is designed and conveyed in eight chapters to provide a clear and logical flow of information, allowing readers to easily navigate through the research and understand the key elements of the study. The following outline provides an overview of the thesis structure:

1. Introduction: this chapter sets the stage for the research by providing background information on whistleblowing and its significance in accounting literature. It outlines the research motivation, focus, objectives, questions, and contributions, giving readers a comprehensive understanding of what the study aims to achieve.
2. Literature review: in this chapter, the existing body of knowledge on whistleblowing, actor-network theory, and related concepts is reviewed. It explores different theories and perspectives on whistleblowing, highlights the processual nature of whistleblowing, and discusses the role of trust in whistleblowing. The literature review sets the foundation for the empirical analysis that follows.
3. Methodology and theorisation: this chapter explains the research methodology employed in the study and introduces the theoretical lens of actor-network theory. It discusses the ontological and epistemological foundations of actor-network theory and its critical perspective. The chapter also explores Callon's three stages of translation and their relevance to the study.
4. Method: in this chapter, the research methods used in the study are described in detail. It discusses the case study research design, data collection methods (interviews, document analysis, and observations), data recording and transcribing, potential biases, and the sample selection process. The chapter also explains the thematic analysis approach used to analyse the data and presents the ethical considerations taken into account.
5. Research context: this chapter provides an overview of the research context, focusing on the State of Qatar and the Qatar Financial Centre (QFC). It introduces the relevant departments within the QFC and discusses the whistleblowing context in Qatar. Additionally, it highlights Qatar's anti-fraud measures and their role in strengthening integrity and trust.
6. Empirical analysis: this chapter presents the findings of the empirical analysis. It explores the translation of matters of concern into a whistleblowing framework within the QFC, discusses the calculations and evaluations involved in developing the framework, and explores the framing of the whistleblowing policy. The chapter also explores the struggles faced in implementing the policy within the wider context.
7. Discussion: in this chapter, the empirical findings are discussed in detail. It explores the centrality of calculation and whistleblowing dynamics, the various types of trust that emerge in the whistleblowing process, the outcomes of significant upfront investment, and the challenges and adjustments to routines in relation to whistleblowing. The chapter concludes with a comprehensive discussion of the findings.
8. Summary, reflections, and conclusions: this chapter summarises the key findings of the study, discusses their contributions to the literature, and outlines the implications for policymakers. It also acknowledges the limitations of the research and provides suggestions for further research. The chapter concludes the thesis by summarising the overall journey and the insights gained.

## 2 Literature review

### 2.1 Overview

The term ‘*whistleblowing*’ is used to describe the process of exposing wrongdoing. Whistleblowing is also known as *good faith reporting* along with *anonymous* and *protected disclosure* (Brennan, 2020). In the context of political meaning, Rothschild (2013) asserted whistleblowing as an act of free speech, which has Greek origins. This indicates the request of only honourable citizens to speak freely and frankly while others such as slaves/noncitizens were not allowed. In the third century, the first whistle goes back to ancient China. The guards blow the whistle to ‘alert’ the city of invaders (McNab, 2014).

Nevertheless, some academics attribute use of the term ‘whistleblowing’ to the English police officers who blew the whistle to confront criminals (Rubinstein, 2007). Gao and Brink (2017) stated that the term ‘whistleblowing’ derives from the world of team sports, in which referees blow a whistle to stop foul play or illegal moves<sup>13</sup> (Qusqas and Kleiner, 2001). A similar concept has been adopted in various fields, wherein researchers have been defining whistleblowing in various ways (Erkmen, Çalışkan and Esen, 2014). The term ‘whistleblower’ was often associated with the American public activist, Ralph Nader in 1971 (Miceli and Near, 2013). However, Brennan (2020) found the term used earlier by Hackler in 1966 (pp. 28–29) and stated: “it is clear that someone must take the initiative in punishing the culprit—someone must blow the whistle. And the whistle is blown when it’s to someone’s advantage to do so... In our complex society groups are often enmeshed. It may be wiser for the individual working in the midst of this network not to blow the whistle”.

In all cases, as noted above, whistleblowing is a term used to refer to an act of alerting and attracting attention whereby wrongdoings are detected.

### 2.2 A processual account of whistleblowing

#### 2.2.1 The definition of whistleblowing

There is no generally agreed definition of whistleblowing. In general, whistleblowing is mainly defined as an act, which involves reporting wrongdoing. Disagreement emerges regarding an individual, including the whistleblower, wrongdoer, report recipient, circumstances of reporting, and motives for reporting wrongful act. It further arises at the time of determining whether the reporting is internal or external. Brennan and Kelly (2007) stated that the most frequently used and widely accepted definition of whistleblowing was propounded by Near and Miceli (1985) as:

*The disclosure by organisation members (former or current) of illegal, immoral, or illegitimate practices under the control of their employers, to persons or organisations that may be able to effect action.*

This definition of whistleblowing has since been adopted by various researchers to carry out related studies (e.g., Alleyne et al., 2017; Alleyne, Hudaib and Haniffa, 2018; Andon et al., 2018). However, Rothschild (2013) argued that the organisational response defines whistleblowing. If a company rectifies its misconducts, a person will not be called a ‘whistleblower’. On the other hand, if a company resists correcting the wrongdoings, thereby practices retaliation against the individual, then this person is called a ‘whistleblower’.

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<sup>13</sup> In 1878, during a game between Nottingham Forest (2) and Sheffield (0) in the second round of the English Football Association Cup, a whistle was used for the first time in a professional football game.

Jubb (1999) later defined whistleblowing as:

*a deliberate non-obligatory act of disclosure, which gets onto public record and is made by a person who has or had privileged access to data or information of an organisation, about non-trivial illegality or other wrongdoing whether actual, suspected or anticipated which implicates and is under the control of that organisation, to an external entity having potential to rectify the wrongdoing.*

Jubb (1999) stated that whistleblowing comprises six elements, which include ‘disclosure subject’, ‘act of disclosure’, ‘actor’, and ‘target’ along with ‘outcome’ and ‘disclosure recipient’.

Another related term is ‘*speaking up*’ and mainly focuses on sharing problems with others, who are engaged in devoting organisational attention concerning the same (Cunha *et al.*, 2019). On the contrary, Near and Miceli (2016) differentiated employee voice that emphasised enhancing business operations, thereby benefiting organisations, while whistleblowing is related to wrongdoing. Contextually, organisations are more focused on developing an open culture, which helps in encouraging employees to speak up (Brennan, 2020).

*Speaking up* is different as compared to *whistleblowing*. Premeaux and Bedeian (2003, p. 1538) referred to speaking up as “openly stating one’s views or opinions about workplace matters, including the actions or ideas of others, suggested or needed changes, and alternative approaches or different lines of reasoning for addressing job-related issues”. Nevertheless, companies observe the negative impact of speaking up because it is linked to whistleblowing. Cunha *et al.* (2019) further highlighted the inconsistency along with the dilemmas concerning the business speak-up systems.

Unlike Jubb’s (1999) definition, Near and Miceli’s (1985) approach to defining whistleblowing encompasses several important distinctions. Firstly, it considers the disclosure of wrongdoing as non-obligatory, meaning that individuals may choose to report such instances voluntarily rather than being bound by any legal or ethical obligation to do so.

Secondly, Near and Miceli’s definition does not limit itself to addressing only the most severe forms of wrongdoing. Instead, it acknowledges that whistleblowing can extend to cases of less severe misconduct, such as laziness or poor work performance.

Thirdly, Near and Miceli’s definition recognises the significance of internal reporting channels within organisations. In contrast to Jubb’s approach, which does not differentiate between internal and external reporting, Near and Miceli highlight the importance of reporting wrongdoing through internal channels.

Taking into account these three essential points, it becomes evident that Near and Miceli’s (1985) definition provides a more comprehensive and inclusive understanding of whistleblowing. It considers a broader range of scenarios and contexts in which individuals may choose to blow the whistle on wrongdoing.

The significance of adopting Near and Miceli’s definition is evident in the context of conducting the present study. By encompassing various forms of non-obligatory disclosure, acknowledging less severe forms of misconduct, and recognising the relevance of internal reporting channels, this definition offers a different and holistic perspective on whistleblowing. As a result, it serves as the most suitable framework for carrying out the research at hand.

### 2.2.2 The process orientation of whistleblowing

The process-based viewpoint of whistleblowing is mainly a four-step process, which further involves human parties and nonhumans (Near and Miceli, 1995). Herein, these four steps focus on [1] ‘identifying a wrongful act’, [2] ‘decision to report’ along with [3] the ‘organisational response to conclude the activity’,

as well as [4] ‘organisational response to the whistleblower’. Similarly, the human parties involve the ‘whistleblower’, the ‘wrongdoer’, and the ‘recipient as an individual’. The nonhuman parties involve the ‘organisation’, the ‘wrongdoing’, and the ‘recipient as a channel’. Correspondingly, a whistleblower is a person exposing the wrongdoing, while the wrongdoer is an individual committing the misconduct. On the other hand, the recipient refers to the individual, who obtains a report from the whistleblower (Near and Miceli, 1995). Whistleblowing has become a crucial aspect of organisation’s internal control systems (Hooks, Kaplan and Schultz, 1994; Ghani, Galbreath and Evans, 2011). The proper managerial response concerning the internal issues about the misconduct can help in avoiding financial loss along with reputational damage, as well as undue attention, especially from the regulators’ end (Near and Miceli, 2016).

In subsection 2.2.1, we have encountered two distinct definitions of whistleblowing. These definitions present whistleblowing not as an isolated event but rather as an ongoing process. By conceptualising it as a process and situated practice, we move away from the notion of a singular occurrence and dig into a more dynamic understanding of whistleblowing (Brown *et al.*, 2014).

In this perspective, whistleblowing takes shape as a phenomenon that emerges through the collective actions and routinized practices of various actors, encompassing both human and nonhuman entities. It is no longer confined to a single act but rather becomes a series of interconnected actions that unfold over time (Brown *et al.*, 2014; Langley and Tsoukas, 2016).

By adopting the lens of a process and situated practice, we open up new avenues for exploring the complexities and details of whistleblowing (Langley *et al.*, 2013; Brown *et al.*, 2014; Mahama and Chua, 2016). This viewpoint acknowledges the involvement of multiple actors, including individuals and nonhuman elements, in shaping the whistleblowing process.

This conceptual shift expands our understanding of whistleblowing beyond its surface level description. It encourages us to explore the interplay between human and nonhuman agency, organisational structures, and the broader socio-technical context in which whistleblowing unfolds.

Overall, understanding whistleblowing as a process and situated practice enriches our knowledge of this crucial phenomenon, opening the way for deeper insights and more informed approaches to studying and addressing it. As we dig into the complex dynamics that characterise whistleblowing, we gain a more comprehensive perspective that can guide us in creating effective strategies to promote ethical conduct and accountability within organisations and society.

### 2.2.3 The centrality of time and whistleblowing

The study of processes is focused on why and how they emerge, develop, or decline or change significantly over time. Processes are temporal and subject to the centrality of time, which is crucial to gaining an understanding what to do in whistleblowing practice, at what point of time, and in what context. By considering the centrality of time, this study of the whistleblowing process makes a crucial contribution to knowledge; one that cannot be reached through variance theorising (dependent and independent variables), which is intended for generalisation (Langley *et al.*, 2013) because it tends to “ignore time, reduce it to a lag effect, compress it into variables (e.g., describing decision making as fast or slow, or environments as dynamic or stable), or reduce its role to what Pettigrew, Woodman and Cameron (2001) called ‘comparative statics’ (re-evaluating variance-based relationships at successive times)” (Langley *et al.*, 2013). For Pettigrew (1997), process means “a sequence of individual and collective events, actions, and activities unfolding over time in context”. Here, whistleblowing is therefore not limited to observing and reporting; it extends to include a series of processes and collective actions, including investigation and protection.

By excluding time, the theoretical variance approach is removed from the temporary flow of organisational life (Langley *et al.*, 2013). Uncertainty, together with the temporary structure of social practices, cannot be

easily examined through empirical models. The latter, with their timeless proportions, fail to provide knowledge that is actionable, that enables achievement of an understanding of what to do, at what point of time, and in what context (Sandberg and Tsoukas, 2011).

Temporality, which lies in the centrality of time, is crucial for organisations. Van Oorschot, Akkermans and Sengupta (2013) explained the *'decision trap'* by which managers extend the time allocated to current temporary activities at the expense of that needed for future operations. Mackay and Chia (2013) showed how decisions that look good at one point in time may appear disastrous at another, when new actors intervene. In the context of mergers, the balance between economic and political concerns leads managers to follow completely different strategies over time (Monin *et al.*, 2013).

The theoretical variance approach, which lacks evidence-based practice, is still the object of debate. This type of theoretical variance relates to knowledge that shows what works and usually involves comparing performance in large data samples or experiments (Langley *et al.*, 2013; Langley and Tsoukas, 2016). Further scrutiny makes clear that something crucial to making this knowledge actionable is still missing. In other words, the theoretical variance approach does not generate knowledge of how to produce change, which is desirable as suggested by the evidence. Knowing that the practices enacted by company B are more effective than those enacted by company A does not provide the knowledge needed to bring company A in line with company B. Furthermore, the nature of the practices and the context in which they are applied may include processes involving resources and dynamics that could provide original evidence to support the need for change (Langley *et al.*, 2013). Overall, if the theoretical variance approach generates know-what, the theoretical process produces know-how.

As mentioned earlier, whistleblowing policies undergo changes over time, reflecting the temporal progressions of activities influenced by the centrality of time. Unfortunately, prior studies on whistleblowing often overlooked the significance of time, instead representing it through variables such as gender (Liyanarachchi and Adler, 2011), age (Erkmen, Çalışkan and Esen, 2014), work experience (Guthrie and Taylor, 2017), and morality and attitudes (Latan, Ringle and Jabbour, 2018). These studies tended to view whistleblowing as a static event rather than a dynamic process (Brown *et al.*, 2014), presenting their findings in timeless and propositional statements. Consequently, the emphasis on theoretical variance and the use of empirical models with timeless proportions have restricted the practical applicability of the knowledge gained.

To truly understand the essence of whistleblowing, it is necessary to acknowledge its temporal dimension. The act of blowing the whistle on organisational wrongdoings is not a one-off occurrence but rather a multifaceted and evolving process. Through integrating the element of time into our understanding, we can dig deeper into the complexities and differences of whistleblowing behaviour (Brown *et al.*, 2014).

While previous research has shed light on the whistleblowers' intentions to expose misconduct within organisations (Gao and Brink, 2017; Lee and Xiao, 2018), it has limited our knowledge by treating whistleblowing as a singular, isolated incident. By adopting a more dynamic perspective, we can appreciate whistleblowing as an ongoing series of interconnected actions shaped by various factors and actors over time.

To unlock the full potential of whistleblowing research, we must adopt an approach that considers the temporal aspects and adopts the dynamic nature of this crucial phenomenon. This will enable us to develop actionable insights and strategies that can be effectively implemented to foster ethical behaviour and accountability within organisations.

#### 2.2.4 Change and becoming of whistleblowing

Whistleblowing should not be considered as a single event, but "as a phenomenon shaped by the processes of context and sense making" (Edwards, 2008; Brown *et al.*, 2014). Although the centrality of processing



and timing includes the temporal progressions of activities, it is seen from different angles in the ontology of the social world: [1] Process is a change in things; [2] process is a change in the processes themselves (Langley *et al.*, 2013). This section highlights these ontological views and narrows down the need to studying the changes in the processes themselves, rather than also in things.

From the perspective of the process of the change in things, even though the quality of a subject may change, the subject remains unchanged. For example, 3M is an innovative company, 3M is the subject, and innovation is its quality. Although such quality may change over time, the company remains 3M. 3M may lose its quality of innovation, but that does not stop it from being 3M. In contrast, reality is not made up of things, and the process is seen as a change in the processes themselves. It is a fallacy to say that nature is enduring things, because it consists of diverse and volatile activities: “Process is fundamental: The river is not an object but an ever-changing flow; the sun is not a thing, but a flaming fire. Everything in nature is a matter of process, of activity, of change” (Langley *et al.*, 2013, p. 5).

From the process perspective, entities—such as companies and structures—are nothing more than continuously becoming and temporary instantiations of ongoing processes. “Changing in this view is not something that happens to things, but the way in which reality is brought into being in every instant”. Therefore, organisational values are “not as cognitive or cultural entities that may shift from (say) value set A to value set B between two fixed points in time, but as a form of practice continually constituted and adapted through ongoing ‘values work’ enacted by organisation members” (Langley *et al.*, 2013, p. 5).

In this regard, context is not something that remains constant, and the changes outside are analysed. Still, the context itself is continuously being reshaped with—and by—processes of interaction over time. This results in a wide range of unexpected and uncontrollable activities and events generated over time. So the actors, environments, and companies are all in a mutual interactive flow. From a process perspective, Langley *et al.* (2013) wrote:

*...an organisation is a dynamic bundle of qualities. Some qualities persist more than others, but there is no substance that endures unchanged. Moreover, this is the point at which ‘process’ meets ‘practice’ since how the past is drawn upon and made relevant to the present is not an atomistic or random exercise but crucially depends on the social practices in which actors are embedded.*

In the same vein, whistleblowing policies represent a dynamic and evolving collection of activities, encompassing reporting through anonymous channels, ensuring protection, and conducting comprehensive investigations. Each component contributes to the central concept of whistleblowing (Brown *et al.*, 2014). Notably, these policies involve a series of interconnected events that require careful examination.

Whistleblowing policies are not static; instead, they demonstrate fluidity, adaptation, and growth over time. They continuously respond to emerging challenges and changing social norms. Whistleblowing policies ebb and flow, processes emerge and develop. The historical development of these policies is not random; rather, it emerges organically from the collective actions of whistleblowers and the systems in which they operate, encompassing both human and non-human entities and their complex interplay.

Thus, understanding the temporal nature of whistleblowing policies enables us to appreciate their complexity and contextual relevance. By recognising the interconnectedness of events and the influences of various actors, we can foster more effective and comprehensive policies that support ethical conduct and safeguard against wrongdoing (Brown *et al.*, 2014). Adopting this perspective empowers organisations to create environments that promote integrity and encourage accountable disclosure.

### 2.2.5 Whistleblowing processes are situational

The investigation of whistleblowing varies worldwide, as the process is influenced by cultural factors specific to each country and society. Whistleblowing is not a universal concept, but rather one that has distinct origins and interpretations within different societies and cultures. For instance, in France, it is known as '*droit d'alerte*', meaning 'right to raise the alarm', while in the Netherlands, whistleblowers are referred to as '*klokkenuider*' or bell-ringers, going back to the historical practice of alerting others to danger. However, the perception and understanding of whistleblowing differ across cultures, with negative connotations associated with terms like gossiping '*talebearer*' in Israel and '*impimpis*' during South Africa's apartheid era. These cultural differences can result in varied actions and processes related to whistleblowing (Brown *et al.*, 2014).

Anthropologists have long studied culture, and in the context of whistleblowing, cultural differences have been explored to understand how violations are reported across different cultures. It is important to distinguish between culture as a set of values and culture as the meanings assigned by individuals in their lives (Earley, 2006). Realist and social constructivist approaches offer different perspectives, with realism seeking to explain and constructivism aiming to understand and interpret (Yeganeh, Su and Chrystome, 2004). The knowledge of culture should consider both the tangible expressions of culture and the subjective interpretations made by individuals within their specific contexts (Brown *et al.*, 2014).

Culture research must address whether culture consists of fixed values and beliefs or if it is subject to individual interpretations, or even both. Prior whistleblowing studies (e.g. Schultz *et al.*, 1993; Miceli and Near, 2013) often oversimplified culture by using the nation as a proxy, neglecting the complexity of culture within a nation. It is possible for multiple cultures to exist within one nation, and specific cultures may transcend geographical boundaries (Brown *et al.*, 2014).

Attitudes towards whistleblowing are socially formulated, shaped by the social environment. Perceptions, feelings, and beliefs regarding risks associated with whistleblowing are influenced by cultural factors such as auditor groups, client cultures, organisational control, and accountability mechanisms. Organisational culture also plays a significant role in shaping emotions in the workplace, which further influence individual judgment and decision-making in the whistleblowing process (Nolder and Kadous, 2018).

Cultural factors impact the effectiveness of whistleblowing arrangements in three ways: national cultures, organisational cultures, and language-based cultures. National cultures influence employees' preferences for voicing concerns, necessitating the consideration of cultural differences when designing whistleblowing policies. Organisational cultures can also affect the effectiveness of whistleblowing arrangements if they are perceived as foreign concepts without local contextualisation. Language-based cultures present challenges when employees speaking different languages have varying preferences for reporting concerns (Vandekerckhove *et al.*, 2016). The extent to which national cultures determine whistleblowing practices remains inconclusive (Brown *et al.*, 2014). Even in countries where corruption is prevalent, individuals have demonstrated the courage to combat corruption through alternative means such as hunger strikes and protests (International, 2011).

Trust and culture significantly impact the efficacy of whistleblowing arrangements. Building trust is an ongoing process that influences whistleblowing practices over time. Effective external whistleblowing channels can enhance trust in internal channels, with independence being a crucial element in this process. Cultural challenges can be overcome by addressing regional differences and language barriers (Vandekerckhove *et al.*, 2016).

To address cultural issues, organisations can implement various strategies, including providing diverse voicing channels, accepting concerns that do not strictly fit the whistleblowing definition, establishing a dedicated "back office" for recording and addressing concerns, ensuring well-organised and adequately resourced responsiveness, making responses visible, and developing strategies to address regional and language differences (Vandekerckhove *et al.*, 2016). Organisational culture plays a vital role in whistleblowing behaviour, with seven dimensions—vigilance, engagement, credibility, accountability,

empowerment, courage, and options—shaping the employee reflection process leading to whistleblowing behaviour (Berry, 2004).

Trust and culture profoundly influence the effectiveness of whistleblowing. Trust is a critical factor in determining whether employees will report wrongdoing within an organisation. A culture that prioritises transparency, accountability, trust, and ethical behaviour fosters an environment where employees feel comfortable reporting misconduct. On the other hand, cultures that prioritise profit over ethics may discourage employees from speaking up (Hwang *et al.*, 2008). Organisations can cultivate a whistleblowing supportive culture by implementing policies and procedures that protect whistleblowers from retaliation, providing training on ethical behaviour, and promoting transparency and accountability (Vandekerckhove *et al.*, 2016).

Ethical culture within organisations also has a significant impact on employee responses to observed wrongdoing. Different dimensions of ethical culture, such as clarity<sup>14</sup>, congruency of management<sup>15</sup>, feasibility<sup>16</sup>, supportability<sup>17</sup>, transparency<sup>18</sup>, discussability<sup>19</sup>, and sanctionability<sup>20</sup>, are related to various types of intended responses and influence the development of whistleblowing policies. Organisations that prioritise transparency, accountability, trust, and ethical behaviour create a culture that encourages employees to report misconduct and supports corrective action (Kaptein, 2011).

It is crucial to recognise that whistleblowing processes are contextually situational (Brown *et al.*, 2014). This study specifically explores the whistleblowing process within the organisational Qatari context, taking into account the unique cultural, legal, and organisational factors present in Qatar. By exploring whistleblowing practices in this specific context, we can gain a deeper understanding of how whistleblowing functions and identify effective strategies for promoting transparency and accountability. Understanding the whistleblowing process in the organisational Qatari context will contribute to our broader knowledge of whistleblowing practices and facilitate the development of context-specific policies.

To encapsulate, whistleblowing is influenced by cultural factors that shape attitudes, perceptions, and beliefs about reporting violations. National cultures, organisational cultures, and language-based cultures all impact the effectiveness of whistleblowing arrangements. Trust and culture play vital roles in determining whether employees will speak up and report misconduct. Organisations can foster a whistleblowing supportive culture by prioritising transparency, accountability, trust, and ethical behaviour. By exploring the process of whistleblowing policy, from its inception to its implementation, within specific contexts such as Qatar, we can uncover valuable insights and develop tailored strategies to promote transparency and accountability.

## 2.2.6 Whistleblowing framework in a developing country

Studying whistleblowing in the context of developing countries, like Qatar, is important because it sheds light on the unique dynamics, challenges, and obstacles that whistleblowers face while implementing whistleblowing policies in these settings (Okafor *et al.*, 2020). Public administration in developing countries often operates in a largely clientelistic political marketplace, characterised by bureaucratic secrecy and well-entrenched networks of gatekeepers/custodians of deep-seated group interests. Additionally,

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<sup>14</sup> Clarity: The extent to which the organisation makes ethical expectations, such as values, norms, and principles concrete and understandable to employees.

<sup>15</sup> Congruency of management: The extent to which the actions of management are consistent with the ethical values of the organisation.

<sup>16</sup> Feasibility: The extent to which the organisation makes sufficient time, budgets, equipment, information, and authority available to enable employees to fulfil their responsibilities.

<sup>17</sup> Supportability: The extent to which the organisation stimulates identification with the ethics of the organisation among employees.

<sup>18</sup> Transparency: The extent to which the organisation is open and honest in its communication with employees.

<sup>19</sup> Discussability: The extent to which employees feel comfortable discussing ethical issues with each other and with management.

<sup>20</sup> Sanctionability: The extent to which the organisation punishes unethical behaviour and rewards ethical behaviour.

public institutions employees are often protected by powerful informal networks within and outside public administration, making it difficult for whistleblowers to come forward without fear of retaliation. Furthermore, developing countries often have weak citizen oversight and participation in the management of public institutions, which can hinder the establishment of effective whistleblower protection legislation and institutions. Corruption and dishonesty are also prevalent in public service, making it difficult to assert voices or speak up against wrongdoing (Onyango, 2021).

Hopper, Lassou and Soobaroyen (2017) shed light on the implementation of accounting prescriptions originating from Western contexts in developing countries, facilitated through the assistance of external aid-givers such as Northern donor government departments and international NGOs. However, the implementation of these prescriptions can be challenging due to contextual differences, such as a lack of government commitment, comprehensive budgets, reliable indicators, and transparent, accountable, and effective civil service capacity. Additionally, incentives to incorporate 'best practice' can be perverse, and sometimes local officials use accounting systems and practices instituted by foreign donors to manipulate information to polish the image and performance of organisations. In the realm of whistleblowing framework, its origins can be traced back to Western developed countries and prestigious organisations like the OECD (Onyango, 2021).

In crafting the draft of the whistleblowing framework, the Qatar Financial Centre Regulatory Authority (QFCRA) precisely examined the protected reporting frameworks of Western esteemed benchmark jurisdictions, including the Financial Conduct Authority (FCA) in the United Kingdom, the Office of the Superintendent of Financial Institutions (OSFI) in Canada, the Australian Prudential Regulation Authority (APRA), and the European Union, drawing invaluable insights from the best practice guidance of the Organisation for Economic Co-operation and Development (OECD) (QFCRA-Consultation Papers, 2017). Therefore, understanding the dynamics is important as it offers invaluable insights into the complex process of establishing a whistleblowing framework. By focusing on Qatar's specific cultural, economic, and regulatory context, this research aims to deepen our understanding of how QFCRA's whistleblowing framework emerges and operates in such contexts and uncover its effectiveness.

This research represents a prominent contribution, aimed at developing more contextually appropriate and highly effective whistleblowing practices in developing nations. As policymakers and stakeholders alike engage in this critical endeavour, the implications of the study extend far beyond national borders, resonating globally to elevate the standards of accountability and transparency, fostering an environment of trust and integrity (Okafor *et al.*, 2020; Onyango, 2021).

Overall, studying whistleblowing in the context of developing countries can offer a better understanding the challenges and prospects for improving whistleblowing framework in these settings. This can lead to the development of more effective policies and strategies for promoting transparency, accountability, and good governance in developing countries.

### 2.2.7 Whistleblowing theories

The whistleblowing process involves a diverse range of actors, including the whistleblower, the report, the wrongdoing, the report recipient, the response, the company, the investigator, and the outcomes (Gao and Brink, 2017; Lee and Xiao, 2018). Previous studies have explored these actors from various perspectives, emphasising the importance of recognising both human and non-human elements within the whistleblowing context (Pianezzi and Grossi, 2020).

Whistleblowing has been examined through different theoretical lenses, including power (Taylor and Curtis, 2013), change (Wolfe and Milliken, 2014), planned behaviour (Alleyne, Hudaib and Haniffa, 2018), organisational justice (Soni, Maroun and Padia, 2015), institutional theory (Okafor *et al.*, 2020), public interest theory (Quayle, 2021), legitimacy (Stolowy *et al.*, 2019), fraud triangle theory (Smaili and Arroyo,

2019). Researchers have employed various research methods, such as archival analysis (e.g., Lee and Fargher, 2013; Baloria, Marquardt and Wiedman, 2017), experiments (e.g., Guthrie and Taylor, 2017; Andon *et al.*, 2018), and surveys (e.g., Brown, Hays and Stuebs, 2016; Alleyne, Hudaib and Haniffa, 2018; Latan, Ringle and Jabbour, 2018), to investigate the determinants of whistleblower intentions, including demographics (Guthrie and Taylor, 2017), personality (A. G. Brink, Lowe and Victoravich, 2017), and morality (Latan, Ringle and Jabbour, 2018). The legal perspective has also been explored, considering aspects such as internal hotlines (Zhang, Pany and Reckers, 2013), anonymous channels (Kaplan *et al.*, 2012), reporting recipients (Kaplan, Pope and Samuels, 2010), and rewards (Brink, Lowe and Victoravich, 2013).

While research on whistleblowing has primarily focused on intentions as a proxy for action, it is crucial to acknowledge that intention alone does not always lead to action. The translation of intention into action is a complex process that depends on the appropriate timing and opportunity (Mesmer-Magnus, 2005). Accessing the whistleblowing process in the field presents a challenge due to its confidential and sensitive nature. Early studies utilised survey questionnaires, scenarios, experiments, and archival methods. Although these methods provide valuable insights, they have limitations in capturing the complexities of whistleblowing in practice (Brown *et al.*, 2014). However, it is essential to conduct this research with professional specialists to capture the reactions and dilemmas faced in real-life organisational contexts (Brennan, 2020).

Despite the significance of whistleblowing, weaknesses exist in our understanding of whistleblower protection (Wainberg and Perreault, 2016), investigation processes, and the functionality of anonymous channels (Guthrie, Norman and Rose, 2012). These gaps motivate the current study, which aims to gain insights into the whistleblowing process as it relates to the emerging whistleblowing framework at the QFCRA, serving as an accountability mechanism to combat fraud and wrongdoing. Understanding the dynamic processes in practice since its birth is crucial for understanding the network outcomes and the underlying structures that contribute to these outcomes (Ahuja, Soda and Zaheer, 2012; Mahama and Chua, 2016).

The forthcoming subsections will present the previous empirical findings concerning the various actors involved in whistleblowing, shedding light on their roles and interactions within the whistleblowing process. Appendix 3 provides a summary of the empirical findings from these studies.

### 2.3 The whistleblowing process (structured phases)

In this section, we dig into a detailed exploration of the empirical findings regarding whistleblowing processes. These findings are organised and presented in terms of structured phases, which were originally proposed by Miceli and Near (1992). The purpose of this analysis is to gain a deeper understanding of the various stages involved in the whistleblowing process, shedding light on how individuals navigate and engage in this crucial phenomenon.

By adopting a structured approach, Miceli and Near (1992) sought to uncover the step-by-step progression of events and decision-making that whistleblowers undergo when they encounter wrongdoing or unethical practices within their organisations. Their work set the foundation for understanding whistleblowing not merely as a singular event but as a complex and dynamic process shaped by contextual factors and individual sense-making.

It is important to recognise that whistleblowing is a complex social phenomenon that involves multiple actors, including whistleblowers, recipients of the information, organisations, and the broader societal context. Each phase of the process brings its own set of challenges, emotions, and considerations, making it necessary to understand the dynamics in the field.

However, while Miceli and Near's (1992) conceptual model provided valuable insights, it mainly relied on empirical data from surveys and hypothetical scenarios. This study aims to build upon their work by scrutinising the whistleblowing process in a real-world context, involving whistleblowing professionals and organisations. By doing so, we can bridge the gap between theory and practice, gaining practical insights that can inform policy and organisational measures to encourage ethical reporting and protect whistleblowers.

Figure 2 illustrates the whistleblowing process as per Miceli and Near's (1992) model (adopted by Lee and Xiao, 2018)<sup>21</sup>.

### 2.3.1 Observing misconduct

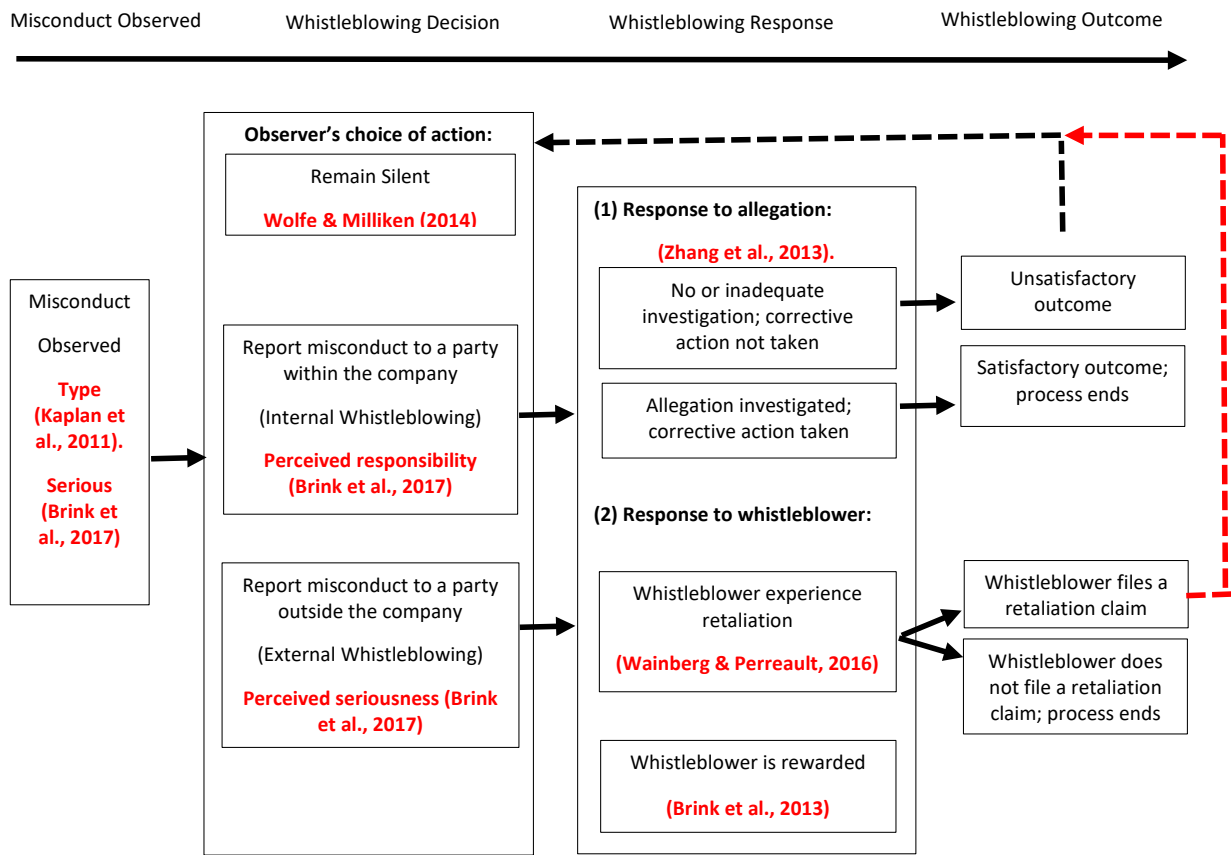


Figure 2: The whistleblowing process (structured phases)

The whistleblowing process initiates with an individual observing an instance of misconduct. The literature identifies three main areas of the wrongdoing observation event that can influence whistleblowing intention. They are the organisational dependence on wrongdoing, the credibility of the evidence presented by the whistleblower, and the legitimacy or illegitimacy of the wrongdoing (Near and Miceli, 1995).

#### 2.3.1.1 Organisational dependence on wrongdoing

<sup>21</sup> If whistleblowers experience retaliation and decide to file a complaint, (retaliation is wrongdoing by itself), they may then choose to report externally and the process continues. A process line is added between "Whistle-blower files a retaliation claim" and "Observer's choice of action".

In the literature, wrongdoing is discussed in relation to its type, such as financial statement fraud, which can benefit both the organisation and the wrongdoer. This type of wrongdoing indicates organisational dependence and, consequently, a lower intention to report. Conversely, any misappropriation carried out by an employee benefits only the wrongdoer and not the organisation; therefore, it does not indicate organisational dependence, which may lead to a stronger whistleblowing intention (Robinson *et al.*, 2012). The analysis of previous research revealed that, in cases of high organisational dependence on wrongdoing, wrongdoing reporting intention is low as whistleblowers anticipate weak organisational response (Kaplan and Schultz, 2007). Conversely, in cases of misappropriation of organisational assets, whistleblowing intention is higher, but only when anonymous reporting channels are available (Kaplan *et al.*, 2009b).

#### 2.3.1.2 Evidence strength

The strength of the evidence of the wrongdoing (Brink, Lowe and Victoravich, 2013; Brink, Eller and Gan, 2015) and the wrongdoing's materiality (Brink, Cereola and Menk, 2015) also significantly influence reporting intention.

#### 2.3.1.3 Legitimacy or illegitimacy of the wrongdoing

The extant whistleblowing literature has hitherto focussed only on illegal acts such as fraudulent financial reporting (e.g., Brink, Lowe and Victoravich, 2013; Erkmen, Çalışkan and Esen, 2014; Andon *et al.*, 2018), asset misappropriation (e.g., (Zhang, Chiu and L. Wei, 2009; Lowe, Pope and Samuels, 2015; Guthrie and Taylor, 2017), and violations of codes of ethics (Alleyne, Hudaib and Haniffa, 2018). On the other hand, when a wrongdoer engages in misconduct, whistleblowing intentions may be influenced by how the wrongdoer is perceived by others. Is the wrongdoer primarily a saint or a sinner? A wrongful act performed to the end of benefiting the company is largely different from one committed for the sole self-interest of the wrongdoer. The latter's motives—as perceived by others—may affect the extent to which he/she is perceived as credible; therefore, whistleblowing intention may be affected accordingly. A wrongful act committed to benefit the company is often met with a weak organisational response (Near and Miceli, 1995).

### 2.3.2 Blowing the whistle

#### 2.3.2.1 Motivations to blowing the whistle

Whistleblowers play a crucial role in exposing wrongdoing and upholding ethical standards within organisations. However, their decision to blow the whistle comes with significant risks and challenges. The study by Kenny, Fotaki and Vandekerckhove (2020) challenges the common perception of whistleblowers as fearless truth-tellers, independent of their organisations. Instead, the study proposes a new understanding of whistleblower subjectivity, highlighting the passionate attachments whistleblowers have to their organisations and professional norms, even after facing severe reprisals.

Motivated by a desire to do the right thing and protect the public, whistleblowers are driven by their ethical faiths (Kenny and Fotaki, 2023). They seek to prevent harm and act as defenders of societal values. Additionally, the study by Kenny and Fotaki (2023) reveals that whistleblowers are not detached individuals but rather passionate organisational subjects. They feel a sense of responsibility and loyalty to the organisations they work for, even when facing mistreatment and rejection (Kenny, Fotaki and Vandekerckhove, 2020).

Whistleblowing increases when an individual perceives more accountability towards reporting accounting misconducts. Thus, this activity is considered to be a pro-social behaviour. Whenever the individuals realise and perceive greater accountability about reporting any accounting-related misconduct, the whistleblowing

intentions is observed to be higher. This relationship has been evident in various studies (e.g., Alleyne *et al.*, 2017; Brink, Lowe and Victoravich, 2017). The personal accountability relating to fraud reporting is examined and has been found that participant considers less personal accountability to report fraud when the sub-certification is present to indicate that financial statements are fraud-free. Subsequently, the intention of reporting internal whistleblowing will be less (Lowe, Pope and Samuels, 2015). Moreover, it has been identified that there is an interconnection between an individual's perceived personal accountability along with individual's team norms and organisational culture. The supportive team norm towards whistleblowing increases the intention and the personal perceived accountability regarding reporting fraud in audits (Latan, Ringle and Jabbour, 2018).

### 2.3.3 The report recipient

The whistle-blower must decide whether or not to report the observed misconduct<sup>22</sup>. Although reporting can be done either internally or to external parties, such as regulators or the media, most whistleblowers report internally (A. G. Brink, Lowe and Victoravich, 2017).<sup>23</sup> The reporting of any instances of misconduct through internal channels is mainly encouraged by corporations, as external reporting would involve greater litigation risks, thereby resulting into higher reputational damage (Berry, 2004). The literature suggests two major categories affecting choice of action: [1] the report recipient, as an individual, and [2] the reporting channel (Near and Miceli, 1995).

#### 2.3.3.1 The report recipient as an individual

The report recipient is the person at the receiving end of the wrongdoing report (Gao and Brink, 2017). As the role of the report recipient is usually played by an internal auditor, most of the studies conducted in this regard have focussed on such players. Considering the differences in relative power between the most common report recipients (top supervisors or internal auditors), when an unsuccessful social confrontation takes place between the potential whistleblower and the wrongdoer, the former's identity is disclosed, compromising his/her anonymity protection. In these cases, to protect themselves from retaliation, whistleblowers tend to report wrongdoings internally to the most powerful recipient within the organisation. As a result, there is a high propensity to blow the whistle on an accounting related misconduct (linked to either financial statements or assets misappropriation) to a top supervisor, rather than to an internal auditor (Kaplan, Pope and Samuels, 2010). Furthermore, internal auditors are a more likely choice than external ones as report recipients (Kaplan, Pope and Samuels, 2011).

#### 2.3.3.2 The reporting channel (anonymous vs. non-anonymous)

Reporting channels have been discussed extensively in terms of their anonymity or lack thereof (i.e., Kaplan & Schultz, 2007; Curtis & Taylor, 2009). The SOX Act establishes that companies are required to set up and maintain anonymous reporting channels. Also, The QFCRA (2018) set out rules that oblige authorised firms to establish whistleblowing policies that mandate the provision of at least two independent channels (i.e., a dedicated email address and telephone number) dedicated to anonymous whistleblowing. Although it has been argued that anonymous reporting channels may reduce the perceived cost of whistleblowing by reducing the threat or fear of retaliation (Libit, 2014; Day, 2017), it can also be considered to make the reports less convincing for the recipients and can hinder effective whistleblowing investigation (Kensicki, 2006). Guthrie *et al.*'s (2012) findings support and state that there is evidence for the negative effects of

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<sup>22</sup> Wolfe & Milliken (2014) asserted that, "Many organisations are caught in an apparent paradox in which most employees know the truth about certain issues and problems within the organisation yet dare not speak that truth to their superiors." Yet, employees remain silent. Wolfe & Milliken (2014) further noted that the "tendency to reject or respond negatively to dissent or negative feedback" is a major reason behind a climate of silence.

<sup>23</sup> Survey results indicate that internal whistleblowing is the preferred option. Björkelo *et al.*'s (2011) survey results show that 98.5% of their sample whistleblowers had reported internally. Another survey conducted by Smith (2010) on Australia's public sector whistleblowers revealed that 97% had filed their reports internally.



anonymous whistleblowing in terms of credibility. although there is no direct relationship between anonymous reporting and whistleblowing intentions (Pope and Lee, 2013). Kaplan & Schultz (2007) examined a sample of MBA students and found that non-anonymous reporting intentions were higher than anonymous ones. On a similar note, Robertson et al. (2011) evaluated data drawn from an auditor group and concluded that non-anonymous whistleblowing was preferred. Pope & Lee (2013) stated that there is no relation between anonymous or non-anonymous reporting and whistleblowing intentions. Curtis & Taylor (2009) further asserted that auditor intentions are reduced when the whistle-blower's identity is disclosed. However, Curtis & Taylor (2009) found no evidence to support any significant differences regarding reporting intentions among anonymous reporting and when the identity is protected. Yet, under certain conditions, little evidence was found in previous studies between anonymous reporting and whistleblowing intentions. Kaplan et al.'s (2012) study further investigated whistleblower reporting preferences, and found that anonymous reporting was only preferred in those cases in which an organisation's previous responses had been negative. Kaplan et al. (2009a) also stated that gender does not impact non-anonymous reporting intentions but anonymous reporting intentions are found to be higher in females.

#### 2.3.3.3 The reporting channel (internal vs. external)

Reporting has been discussed extensively in terms of internal vs. external channels (Lee and Xiao, 2018). Kaplan et al. (2009b) compared the effectiveness of reporting wrongdoings through internal and external channels, and found higher intentions towards the former. Zhang et al. (2013) stated that internal channels may not always be the best in those cases in which whistleblowers are willing to act proactively in the presence of poor organisational responses to whistleblowing. Further, Brink, Lowe and Victoravich (2013, 2017) consistently found that, with a few exceptions, whistle-blowing intentions are higher in relation to internal channels than to external ones. For example, Brink et al. (2017) examined reporting intentions in relation to both channels based on type of wrongdoing (financial statement fraud vs. insider trading) and individual attitudes towards wealth (anxiety, distrust, and power). Their results showed that in those cases in which a wrongdoing is perceived to be serious, the intentions to report it through external channels is comparatively higher. Conversely, when the reporting of a wrongdoing act is perceived as a personal responsibility by the whistleblower, internal channels are preferred.

#### 2.3.4 Organisational response

Organisations are seen to respond to any misconduct observed only in the presence of a whistleblowing report (Near and Miceli, 2016b). They may conduct investigations (Curtis and Taylor, 2009b; Kaplan, Pope and Samuels, 2011), stop the misconduct (if possible), and prevent any retaliation against and reward the whistleblower (Xu and Ziegenfuss, 2008; Brink, Lowe and Victoravich, 2013; Rose, Brink and Norman, 2018). Conversely, organisations may fail to enact the measures listed above and even retaliate against the whistleblowers. A whistleblowing procedure can be considered to have been completed when the results are deemed satisfactory by the whistleblower. On the other hand, if such results disappoint the whistleblower, he/she can decide to take further whistleblowing action, but involving external parties, which can be more damaging for an organisation (Zhang, Pany and Reckers, 2013). Such dissatisfaction can occur when reports are ignored, whistleblowers experience reprisals, and/or the reported misconduct is not rectified. However, whistleblowers may choose to desist after failed attempts to curb any misconduct and bring about changes in organisational practices, thereby effectively bringing to an end the entire whistleblowing procedure.

#### 2.3.5 Outcomes

##### 2.3.5.1 The effects on firms

Corporations largely prefer the reporting of any misconduct to be enacted through internal channels, as external reporting involves greater risk of litigation, thereby resulting in higher reputational damage (Berry, 2004; Kaptein, 2011).

Some studies have taken an archival approach to understand the effects of an organisation's economic and operating characteristics on external whistleblowing intentions (Lee and Xiao, 2018). They collected cases of external whistleblowing from articles, media release platforms, and regulators, and then analysed them. The findings revealed that firms that are more visible, older, reputable (Call, Kedia and Rajgopal, 2016), larger, and with strong share performances (Bowen, Call and Rajgopal, 2010a; Lee and Fargher, 2018b) are more likely to experience external whistleblowing activities.

Prior studies have found negative firm-level impacts in the immediate aftermath of external forms of whistleblowing. Bowen, Call and Rajgopal (2010) conducted a study on various cases of external whistleblowing—involving US firms—that had been effected through different media release platforms and regulators. They found that severe harmful consequences had followed; these could encompass higher share price volatility, poor operational performance, and higher susceptibility to lawsuits (Bowen, Call and Rajgopal, 2010b). Notably, another study conducted to determine the levels of consequences to companies found that they were likely to be subjected to massive regulatory-related fines and penalties as well as to extensive levels of supervisory proceedings (Call et al., 2018).

Despite these negative consequences, it has been recently determined that companies experiencing external forms of whistleblowing will later put in place exceptional corporate governance structures as well as producing very high overall financial reporting quality, making them less likely to further engage in misreporting and aggressive tax practices (Wilde, 2017). Bowen, Call and Rajgopal (2010) found that those companies that had experienced external whistleblowing would improve their corporate governance by reducing the size of their boards—which played a huge role in cutting costs and enhancing board dependency—replacing their CEOs, and, at the same time, ensuring that their board members had lighter workloads (Bowen, Call and Rajgopal, 2010b). It should be noted that these attributes are not as commonly found in entities that have not been forced to engage in external whistleblowing processes.

Therefore, low instances of external whistleblowing signify that a firm has strong control and strong governance, along with a high-quality audit committee (Bowen, Call and Rajgopal, 2010a; Lee and Fargher, 2018).

#### 2.3.5.2 The effects on whistleblowers

Despite whistleblowers' ethical motivations, they often fear retaliation and negative consequences for speaking out. Kenny and Fotaki (2023) point out that these fears are well-founded, as organisations commonly engage in retaliation against whistleblowers. Such retaliation may involve termination of employment, blacklisting from future opportunities, and even legal actions against the whistleblower. To undermine their claims, organisations may resort to discrediting tactics, such as questioning their mental health or accusing them of personal gain (Kenny and Fotaki, 2023).

In specific cases, whistleblowing activities overall favour the individual. For instance, a study conducted on real cases of US-related corporate fraud found that whistleblowing journalists had been the immediate beneficiaries of work and salary-related promotions (Dyck, Morse and Zingales, 2010). However, whistleblowing activities can invite retaliation. In some cases, after engaging in whistleblowing on corporate fraud, auditors lose their clients and find it difficult to secure new clients (Dyck, Morse and Zingales, 2010). The same study found that staff members involved in whistleblowing are then subjected to intense discrimination, which can result in blackballing.

This level of retaliation against whistleblowers is directly linked to the notion of power. The literature discusses the power of wrongdoer in the context of [1] the hierarchical position of the wrongdoer—e.g., if the wrongdoer is in a top-level position or a supervisor instead of a co-worker, the whistleblowing intentions are likely to be low (Taylor and Curtis, 2013)—and [2] the likeability of the wrongdoer— e.g., if the wrongdoer is more likeable, the whistleblowing intentions are low (Robertson, Stefaniak and Curtis, 2011). The power of whistleblowing decreases in those organisations that have a higher dependency on the wrongdoer. It is thereby claimed that retaliation is more likely to occur whenever the wrongdoer is more powerful than the whistleblower, whenever the firm is highly dependent on this former, or even whenever it largely benefits from both the wrongdoing and the wrongdoer (Robinson et al., 2012). Thus, organisations are likely to protect both powerful wrongdoers and good performers. Robertson et al. (2011) and Kaplan (1995) found that when the wrongdoer has an excellent work performance, whistleblowing intentions are reduced, and vice versa.

Besides, when an organisation largely benefits from the whistleblower, the latter is protected even if he/she holds a lower position than the wrongdoer (Robinson et al., 2012). However, powerful wrongdoers and threats of retaliation create an atmosphere of fear and deter whistleblowing (Taylor and Curtis, 2013; Gao, Greenberg and Wong, 2015). Culture also affects whistleblowing. Internal whistleblowing is low when close social ties bind wrongdoer and whistleblower (Hwang *et al*, 2008), even if financial incentives are available (Boo, Ng and Shankar, 2016). Taylor and Curtis (2013) reported that strong organisational responses promote whistleblowing intentions even in relation to powerful wrongdoers.

In light of the challenges whistleblowers face, practical and material support is crucial to help them overcome obstacles and feel empowered to speak up (Kenny, Fotaki and Vandekerckhove, 2020). The study by Kenny, Fotaki and Vandekerckhove (2020) emphasises that whistleblowers are not superhuman heroes but ordinary individuals who may require assistance. Organisations and policymakers should recognise this need and offer support to protect and encourage whistleblowers.

The financial and personal costs borne by whistleblowers can be substantial. They may face a decrease in income, loss of pension titles, and legal expenses related to pre-litigation and legal advice (Kenny and Fotaki, 2023). Additionally, whistleblowers' physical health and personal relationships may be affected as a consequence of their actions. The extent of these consequences can vary depending on the individual's situation and the country they are in (Kenny and Fotaki, 2023).

In response to the challenges whistleblowers face, Kenny and Fotaki (2023) emphasise the need for legal protections and support. Organisations must establish clear reporting mechanisms and cultivate a culture that encourages ethical behaviour and the reporting of wrongdoing. This approach fosters a transparent and accountable environment that promotes whistleblowing as a necessary mechanism for organisational improvement. Furthermore, institutional support and personal networks are essential for the survival and capacity of whistleblowers to speak out (Kenny and Fotaki, 2023). Recognising the vulnerability whistleblowers are exposed to, there is a responsibility to protect them from adverse consequences. This requires practical implications in whistleblower support and policy to safeguard their rights and well-being.

Overall, whistleblowers are driven by their ethical faiths and passionate attachments to their organisations and professional norms. Despite the risks they face, they take extraordinary actions to expose wrongdoing and protect the public interest. Organisations and policymakers need to provide practical and material support, legal protections, and institutional backing to empower and protect whistleblowers.

## 2.4 Trust research in whistleblowing

Organisational trust plays an essential role in motivating whistleblowing. Fair processes and trust in supervisors and the organisation itself increase the likelihood of reporting fraud or wrongdoing (Seifert,

Stammerjohan and Martin, 2014). Trust and fairness foster an environment where employees feel comfortable blowing the whistle, contributing to transparency and accountability.

The concept of ‘trust’ has attracted significant attention in the whistleblowing literature. Prior studies have explored its relationship with various aspects, including attitudes towards money (A. G. Brink, Lowe and Victoravich, 2017), auditors’ intentions (Curtis and Taylor, 2009b), monetary incentives, and organisational justice (Guthrie and Taylor, 2017). The effectiveness of whistleblowing arrangements is strongly influenced by trust. Trust plays a vital role in the development and operation of whistleblowing systems, as it can foster an environment of openness and accountability. Building trust is an ongoing process that can interact with whistleblowing practices over time (Vandekerckhove *et al.*, 2016). However, a gap exists in understanding trust as a dynamic process in whistleblowing practices. This study aims to fill this gap by examining the role of trust in the emergence and enactment of whistleblowing policies, particularly in relation to control (Abdullah and Khadaroo, 2020; Outila *et al.*, 2020). By adopting a practice-based perspective (Reckwitz, 2002; Johnson *et al.*, 2007), this study seeks to uncover the actions and routines involved in building, maintaining, and undermining trust (Mahama and Chua, 2016). This research sheds light on the complex connections between trust, control, and the whistleblowing process, offering valuable insights for organisations and policymakers.

#### 2.4.1 Trusting report recipient

Seifert *et al.* (2014) asserted that the level of whistleblower’s trusts towards their supervisor and organisation. In this context, the supervisors influence their decision making. The high level of trust increases auditor’s intentions and likewise, the low level of trust decreases the intentions of the auditor. In addition, Seifert *et al.* (2014) further stated that a high level of trust has no such effects on external whistleblowing intentions. Additionally, the studies have also examined auditor’s whistleblowing intention and their professional identity. It was realised that the higher the rate of professional identity, higher was the auditor’s intentions towards whistleblowing. The greater commitment of the auditor increased the whistleblowing intentions. These research studies assert that the positive attitude towards profession increased both internal and external whistleblowing intentions.

#### 2.4.2 Trusting protection

Protection from retaliation is critical in building ‘trust’ in whistleblowing policies. For example, the absence of protection in the Auditing Profession Act, APA 2005 in South Africa brings whistleblowing into question as a legitimate act and its ‘trust’ amid employees (Maroun and Gowar, 2013). Under SOX, retaliating against company staff is a crime. However, these regulations are found to be highly ineffective (Miceli, Near and Dworkin, 2008). Rothschild (2008, p. 894) calls the legislative framework of the whistleblowers protection a “*patchwork quilt*”, because whistleblowers are encouraged to report frauds but they fall in the retaliation trap. Also, the European Union (EU) proposed and approved a law, which focused on protecting whistleblowing practice in both public and private sectors (EU, 2018, 2019). It was believed that well-designed internal structural processes can have a positive impact on whistleblowing (Miceli, Near and Dworkin, 2008). However, protection regulations have been shown to be ineffective (Seifert *et al.*, 2010). Nevertheless, Skivenes and Trygstad (2010) highlighted communication culture, especially in Norway’s public companies makes whistleblowing effective within the nation. Managers and employees in Norway are highly engaged in cooperating, which influences wrongdoing. The managers of Norwegian public companies believe that communication and participation are beneficial.

Guthrie and Taylor (2017) asserted that the low threat of retaliation in the organisation along with a higher monetary reward for reporting the fraud will increase organisational trust and whistleblowing intentions of the auditors. Thus, it is understood that the whistleblower’s perception on cost as well as benefits incurred is important for making the decision of whistleblowing against fraud. Guthrie and Taylor (2017) also stated

that the perceived retaliation threat affects auditor's intentions of internal reporting. However, the authors argue that retaliation affects the organisational culture, as the auditors will have low trust over the organisation due to which result misconduct and fraud will be under-reported. Organisational trust plays a significant role in increasing a whistleblower's intentions. The actual organisation retaliation increases external whistleblowing while it decreases the internal whistleblowing. The retaliation threats are more noticeable when it directly affects the whistleblower.

### 2.4.3 Trusting investigation

Curtis and Taylor (2009), stated that the auditor's intention for internal whistleblowing remains higher when they have greater trust towards organisation along with their procedures of investigation for identifying fraud. Furthermore, Taylor and Curtis (2013) opined that organisational responsiveness influences the auditors reporting system, thereby strongly identifying wrongdoers. Kaplan, Pope and Samuels (2011)'s study further supports as well as mentions that internal reporting intentions are high when whistleblowing procedures are inquired. Organisational responsiveness concerning whistleblowing reports determines the whistleblowing intention. Zhang, Pany and Reckers (2013) asserted that negative organisational response towards whistleblowing leads to external whistleblowing intentions.

## 2.5 Critique and questions development

In this comprehensive study, we dig into three distinct but interconnected research streams that collectively illuminate the multifaceted nature of whistleblowing policies within organisations. Each research stream brings a unique perspective to the understanding of whistleblowing, covering different temporal dimensions – past, present, and future. Through these research streams, we aim to gain a holistic view of the complexities surrounding whistleblowing practices, shedding light on its historical emergence, present enactment, and potential future implications. By adopting diverse methodologies and theoretical frameworks, we seek to contribute valuable insights to the field of whistleblowing research, fostering ethical practices, transparency, and accountability within organisations. In this journey, we explore the complex interplay of simplicity and complexity, phenomena and dynamics, and conceptual and actual implications in the realm of whistleblowing policies.

### 2.5.1 Research Stream (1): Simplicity vs. Complexity (Emergence – Past)

Whistleblowing, the act of reporting wrongdoing within organisations, is a multifaceted phenomenon complexly tied to power dynamics within the organisational context (Pianezi and Grossi, 2020). As power relationships evolve over time, the efficacy of whistleblowing can diminish, particularly when an organisation relies heavily on wrongdoers. This can lead to the protection of powerful wrongdoers in high positions, as well as individuals with exceptional performance records. Even lower-ranking wrongdoers may be shielded from accountability. The perceived association between powerful wrongdoers and the threat of retaliation against whistleblowers also influences the intentions of auditors (Taylor and Curtis, 2013; Gao, Greenberg and Wong, 2015). As a result, the propensity for internal whistleblowing is diminished in the presence of close social ties and influential wrongdoers.

Previous scholarly investigations into whistleblowing have sought to simplify the concept by associating it with specific determinants and variables through experimental (e.g., Curtis, Conover and Chui, 2012; Soni, Maroun and Padia, 2015) and survey (e.g., Brown, Hays and Stuebs, 2016; Alleyne, Hudaib and Haniffa, 2018) methods. They often overlook the aspect of time by treating it as a variable compressed into categories like gender, age, work experience, morality, and attitudes. Consequently, whistleblowing has been studied in timeless, general statements, overlooking the temporal progression of activities inherent to organisational life (Langley *et al.*, 2013). This oversimplification hampers the practical applicability of the findings. Acknowledging this limitation, Brown *et al.* (2014) cautioned against symmetrical explanations

for whistleblowing decision-making and emphasised the need for different, asymmetrical explanations that consider the complexities of the empirical world.

To understand the complexities of whistleblowing processes, it is essential to go beyond time-agnostic propositions. Whistleblowing entails a dynamic interplay of temporal activities influenced by the interactions among organisational actors and their evolving context. Merely knowing which gender is more inclined to blow the whistle does not contribute to understanding how whistleblowing unfolds, especially through anonymous internal channels. A more comprehensive approach involves understanding the underlying circumstances that give rise to whistleblowing policies and their specific processes, such as anonymous internal reporting channels, protective measures, and investigations. Furthermore, it requires insight into the micro dynamics that drive changes in whistleblowing processes over time.

Gaining a comprehensive understanding of the emergence of whistleblowing policies facilitates insight into their evolutionary trajectories. Previous studies, which primarily relied on variance theorising, offered knowledge about “what” drives whistleblowing but often neglected the crucial aspect of “how” this knowledge can be effectively applied in practice. Decision-makers and managers seeking to enhance whistleblowing processes over time require actionable guidance rather than abstract information. Thus, the central question arises: “Why and how does a whistleblowing framework emerge?”

## 2.5.2 Research Stream (2): Phenomena/Structure vs. Dynamics (Enactment – Present)

The whistleblowing process involves a diverse range of actors, including the whistleblower, the report, the wrongdoing, the report recipient (individual or channel), the response, the company (the scene of the action), the investigator, the protection officer, and the whistleblowing policy. Previous studies have researched many of these actors from different perspectives (Gao and Brink, 2017; Lee and Xiao, 2018). It is essential to highlight that both human and non-human actors are interconnected within the whistleblowing scene, and their ability to act is influenced by network dynamics, as posited by Actor-Network Theory (ANT) (Pianezzi and Grossi, 2020). Previous studies, such as Miceli and Near (1992) and Lee and Xiao (2018), have identified a structured whistleblowing process with complex relationships. However, due to the temporary nature of social practices, it becomes challenging to examine them through empirical models. The timeless proportions presented in whistleblowing studies limit actionable knowledge, hindering a clear understanding of what actions to take, at what point in time, and in what context (Sandberg and Tsoukas, 2011; Brown *et al.*, 2014). To address this, entities like companies and structures should be seen as continuously evolving and adapting instantiations of ongoing processes, shaped by interactions between human and non-human actors within the company. Whistleblowing policies do not randomly emerge but are built on the social practices of the involved actors, embedded in their context.

Dealing with the complexity of change over time, where the emergent past, enacted present, and future effects intersect, requires following the whistleblowing policy in action at the micro and macro levels. A dynamic approach is vital, as it involves continuously changing and developing forces that control relationships between people or things and how these relationships can evolve. Process thinking assumes that social realities are not stable but dynamic and active processes continuously unfolding (Pettigrew, 1997). Thus, the aim is to capture these dynamic realities. Past emergent whistleblowing policies are not randomly applied to the present but are developed based on the social practices of whistleblowing actors embedded in their context. The processual approach recognises that the evolution of changes is unpredictable and influenced by contextual, political, and cultural factors at various organisational levels. Employing a processual approach, which is analytical rather than merely descriptive, allows for a better understanding of problems in practice and facilitates change management in complex settings (Yazdifar *et al.*, 2012). The dynamics of whistleblowing policies are shaped by organisation-specific processes, temporal progressions of activities, and contextual factors.

Understanding the dynamic processes in practice is important, as our understanding of network outcomes may remain constrained if we fail to evaluate the genesis and evolution of the structures that underpin these outcomes (Ahuja, Soda and Zaheer, 2012; Mahama and Chua, 2016). It is essential to dig into the complex workings of these dynamic processes to gain a comprehensive perspective. By doing so, we can unlock valuable insights into the factors driving the formation and transformation of networks, which, in turn, influence the final outcomes.

Network outcomes are not isolated events; rather, they are shaped by a series of interconnected events and decisions (Mahama and Chua, 2016). A comprehensive analysis of the evolutionary pathways of these structures allows us to understand the underlying mechanisms and interdependencies that contributed to the current state of the network. Ahuja, Soda and Zaheer (2012) advocate for a holistic approach to studying networks, wherein the focus is not solely on the outcomes but also on the processes that preceded them. By adopting this approach, researchers and practitioners can uncover the driving forces, strategic interactions, and essential moments that have driven the network towards its present configuration.

In essence, by understanding the dynamics of networks in practice, we gain a more reflective understanding of their functional dynamics, their strengths and weaknesses, and the opportunities and challenges they present. This knowledge, in turn, equips us to make informed decisions and strategic interventions to optimise network outcomes for future success. Adopting this approach holds the potential to uplift our understanding of network phenomena and foster more effective and impactful strategies within complex networked environments. Therefore, studying the enactment of whistleblowing policies should focus on network dynamics. The primary question researchers should seek to answer is: “How does the whistleblowing policy perform in its strategy and operational processes?”

#### 2.5.2.1 Dynamics (1): the anonymous channel process

Potential whistleblowers are less likely to report accounting-related fraud committed by powerful wrongdoers (Curtis, Conover and Chui, 2012; Taylor and Curtis, 2013; Gao, Greenberg and Wong, 2015), as well as when companies respond negatively to whistleblowing (Zhang, Pany and Reckers, 2013). In synthesis, whistleblowing against upper or top-level management—such as CEOs and CFOs—can be problematic (Ramanathan, Joshi and Khan, 2014). Thus, from this viewpoint, it can be said that whistleblowing mechanisms can help overcome any unethical issues, such as corporate governance failures. At the same time, policymakers need to safeguard whistleblowers. In this context, a whistleblowing recipient is perceived to be internal as well as external recipients through an *anonymous* channel. Even though report recipients are considered to represent a crucial aspect of the whistleblowing process (Loyens and Vandekerckhove, 2018), it has been observed that there is little information on report recipients in relation to whistleblowing through *anonymous* channels. Report recipients can be less convinced by *anonymous* reporting, which can also act as a hindrance for effective whistleblowing investigation. Besides the problems raised in practice, as indicated, by resorting to anonymous channels, there are mixed results concerning whistleblowing report to an anonymous channel (Lee and Xiao, 2018). Previous theoretical research has proposed that credibility, along with the power controlled by the report recipient, significantly assists in motivating individuals to blow the whistle (Near and Miceli, 1995). Hence, it has been suggested that external third parties may control the reporting channels, which may highlight an effective process aimed at protecting or maintaining the anonymity of the whistleblowers (Zhang, Pany and Reckers, 2013; Gao, Greenberg and Wong, 2015). However, in this case, the process of handling whistleblowing reports through anonymous channels is still fragile in relation to the mutual interaction between individuals/investigators and anonymous channels.

#### 2.5.2.2 Dynamic (2): the protection process

There are four common authorised practices, which are involved in promoting whistleblowing. This includes ‘duty to report’, ‘anti-retaliation protection’, ‘liability fines’, and ‘monetary incentives’ (Brennan, 2020).

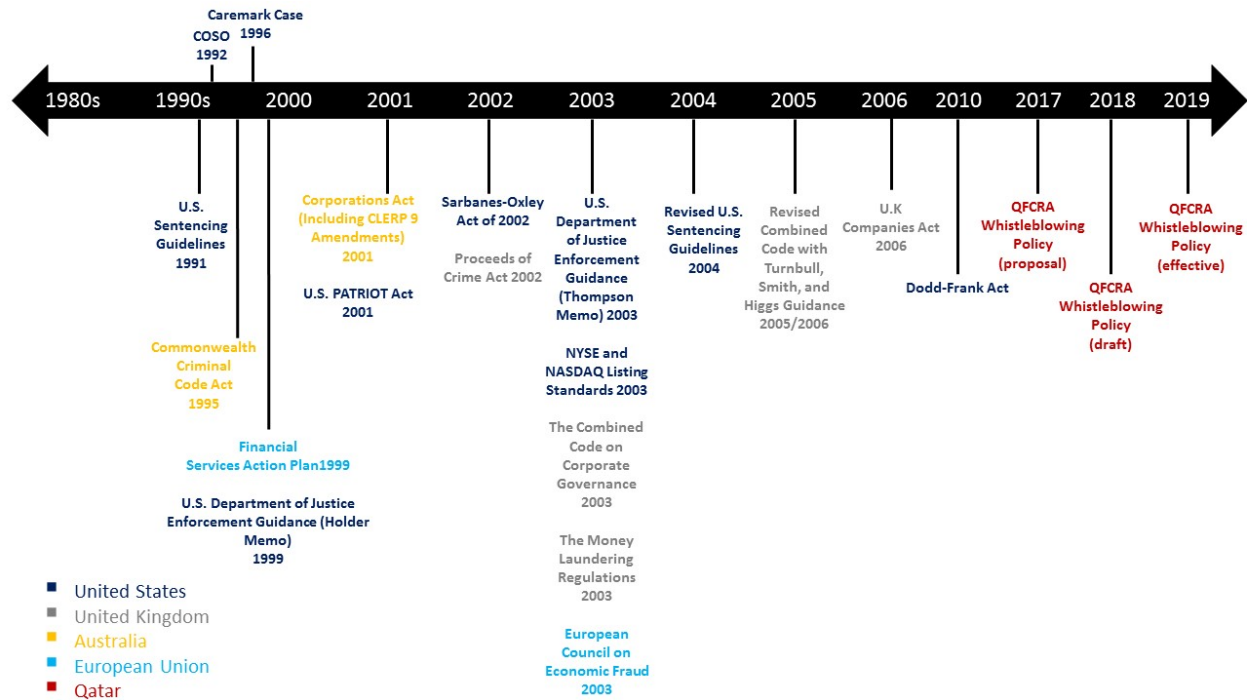


Figure 3: The timeline of regulatory reforms  
(From 1990 – 2005 adopted by KPMG, from 2006 – 2019 adopted by the author)

Globally, specific mechanisms have been proposed to address the issue of overcoming fraud and misconduct. Legislation has been introduced to protect whistleblowers against retaliation and to reward them. Figure 3 presents a timeline of regulatory reforms. In this context, the US and the UK have increased its support to whistleblowing by introducing specific legislation. Thus, the US and the UK introduced legislation such as the Sarbanes–Oxley Act, SOX, 2002<sup>24</sup>, along with the Public Interest Disclosure Act, PID 1999 respectively. Recently, in November 2017, the QFCRA proposed a whistleblowing policy; it was drafted in April 2018 and came into effect in 2019. This policy involves explicit whistleblower protection under the title of ‘protected reporting’.

Moreover, these policies ensure confidentiality and the further protection of whistleblower identities through establishment of anonymous internal channels (Curtis and Taylor, 2009b; Zhang, Pany and Reckers, 2013; Gao, Greenberg and Wong, 2015). The QFCRA’s whistleblowing framework explicitly refers to whistleblower protection and calls the practice “*protected reporting*”. Further, the QFCRA set out compulsory rules for authorised firms to establish whistleblowing policies that mandate the provision of at

<sup>24</sup> The Sarbanes–Oxley Act (SOX) Act was introduced in the US in 2002 to protect corporate whistleblowers. Furthermore, this Act also specifies that listed US companies must maintain an internal whistleblowing system. Moreover, Section 301(m)(4) of the SOX Act highlights the roles of the audit committee in receiving, retaining, and processing complaints regarding accounting, and in auditing matters. The SOX Act specifically protects whistleblowers (Miceli, Near and Dworkin, 2008). Furthermore, under section 18 U.S.C. 1514A, it protects any whistleblowers employed by publicly traded companies from retaliation. Additionally, the Dodd-Frank Act, introduced in 2010, provides provisions aimed at motivating whistleblowers by introducing rewards and incentives (Section 922) (Wellford *et al.*, 2016).



least two independent anonymous channels (e.g., an email address and a telephone number) dedicated to whistleblowing.

The legal protections provided to whistleblowers do not apply to trainee auditors, irrespective of their being part of internal or external reporting structures (Brennan and Kelly, 2007). Awareness of the protection of whistleblowers and of the intentions of auditors was analysed through data drawn from a group of graduate students in Ireland who had auditing experience (Brennan and Kelly, 2007). Brennan & Kelly (2007) also argued that the effective communication of whistleblower protection resulted in fearfulness. Wainberg & Perreault (2016) stated that explicit whistleblower protection (*i.e.*, vivid descriptions of anti-retaliation policies) result into situations in which auditors perceived a higher risk of reporting. Thus, the willingness to report misconduct is reduced. The findings thus suggest that explicit whistleblowing protection should be handled with care. Organisational justice theory shows that, if an organisation's employees perceive that they are being treated fairly, they are more likely to behave in ways that could benefit the organisation itself (Seifert *et al.*, 2010; Soni, Maroun and Padia, 2015b). Internal whistleblowing systems are constructed with the intention of providing higher procedural justice for whistleblowers: interactional justice, which involves a fair conversation with the management about whistleblowing issues; and distributive justice, which involves fair outcomes. These designs encourage auditors to report misconducts (Seifert *et al.*, 2010; Soni, Maroun and Padia, 2015).

As noted above, to assuage the fear of retaliation, governments and policymakers around the world have explicitly emphasised protection in their whistleblowing policies. Besides, these policies ensure further protection and whistleblower anonymity by setting up suitable internal channels. Ostensibly, this explicit emphasis on the protection of whistleblowers is crucial as the reporting of fraudulent activities remains risky even in the presence of anonymous reporting channels. However, the explicit protection afforded to whistleblowers (*i.e.*, the vivid descriptions of anti-retaliation policies) result in fearfulness.

### 2.5.2.3 Dynamic (3): the investigation process

The SOX Act establishes that companies are obliged to maintain *anonymous* reporting channels. The QFCRA (2018) also set out rules compelling authorised firms to establish whistleblowing policies that provide at least two independent *anonymous* reporting channels (*i.e.*, a dedicated email address and telephone number). *Anonymous* reporting channels are argued to have the potential to reduce the perceived cost of whistleblowing by reducing the threat or fear of retaliation (Libit, 2014; Day, 2017). Report recipients could be less convinced by *anonymous* reports, which may also act as a hindrance for effective whistleblowing investigation (Kensicki, 2006). Guthrie *et al.*'s (2012) findings support and state that there is evidence for the negative effects of *anonymous* whistleblowing, as reports presented by *non-anonymous* whistleblowers are perceived as more credible. In this context, whistleblowing is a process that is highly effective when any allegation is adequately investigated and addressed (Pope and Lee, 2013).

### 2.5.3 Research Stream (3): Conceptual vs. Actual Implications (Impacts – Future)

What are the impacts of significant changes resulting from the emergence and enactment of whistleblowing policies? Studying these impacts is crucial to understanding the effectiveness of such policies in protecting whistleblowers from retaliation, shaping organisational culture, and influencing power dynamics (as noted in section 2.5.2). Additionally, exploring the relationship between policy effectiveness and external reporting can reveal insights for continuous improvement (Zhang, Pany and Reckers, 2013; Gao, Greenberg and Wong, 2015). Investigating the long-term implications can guide organisations in refining their strategies for lasting positive outcomes. By addressing this research question, we can promote ethical practices, accountability, and transparency within organisations, ensuring a brighter and more responsible future.

Overall, this study digs into the complexities of whistleblowing policies, moving beyond traditional approaches and exploring the past, present, and future dimensions. By investigating these research streams, we aim to contribute to a deeper and more comprehensive understanding of whistleblowing in developing/emerging economies and its significance in fostering accountability.

## 2.6 Summary and reflection on the literature review

In concluding this chapter, a compelling case can be made for a processual study of whistleblowing and the adoption of Actor-Network Theory (ANT) as a more appropriate theoretical framework than those currently deployed in the literature.

The whistleblowing policy itself poses significant challenges, with its advantages and performance subject to debate. Complaints regarding the functionality of whistleblower programs as accountability mechanisms among accountants and auditors further compound the issue (Guthrie, Norman and Rose, 2012a; Okafor *et al.*, 2020). While prior studies have identified factors influencing internal and external whistleblowing channels (Gao and Brink, 2017; Lee and Xiao, 2018), they have also exhibited limitations. These studies often perceived whistleblowing as a singular event rather than a dynamic process, omitting the crucial temporal dimension in their theoretical accounts (Langley *et al.*, 2013; Brennan, 2020). This event-based perspective, rather than viewing whistleblowing as an ongoing process, restricts our understanding of its true impact and performance (Brown *et al.*, 2014).

Despite decades of research in this field, concerns persist regarding the lack of knowledge about the dynamic processes and network dynamics that trigger whistleblowing's development and changes. Addressing this gap becomes crucial to answering the fundamental question: "why and how do organisational networks (processes of whistleblowing policy as accountability mechanism) emerge, develop, and decline or change significantly over time to meet practice at the organisational level in the context of the QFCRA to suppress fraud and wrongdoings?" Understanding the genesis and movements of these structures is crucial to gain a comprehensive insight into network dynamics and whistleblowing outcomes (Brown *et al.*, 2014; Mahama and Chua, 2016).

Hitherto, whistleblowing studies in accounting-related misconduct fall short of providing evidence-based insights into the alignment between the whistleblowing process and practice, its emergence, development, and potential significant changes. This deficiency arises from the neglect of the temporal dimension in prior theoretical accounts, leading to an abstraction from the temporal flow of organisational life (Langley *et al.*, 2013; Brown *et al.*, 2014). The variance theorising approach, often employed in such studies, overlooks the temporal structure of social behaviours, the inherent uncertainty and urgency in these processes, and the specifics of actions required at different times and contexts (Langley *et al.*, 2013).

Recognising these limitations and adopting a process-oriented approach, such as Actor-Network Theory (ANT), proves necessary (Pianezzi and Grossi, 2020). ANT assumes that social realities are dynamic and active processes rather than stable entities (Gehman, Treviño and Garud, 2013). By conceptualising whistleblowing policies as dynamic bundles of temporal progressions of activities, it highlights the importance of social practices and interactions among whistleblowing actors, both human and non-human, and their context-specific embeddedness. Consequently, generalisations about the uniform performance of whistleblowing policies across organisations become inadequate, as relational dynamics play a defining role in their effectiveness. A whistleblowing policy's efficacy may differ significantly between organisations, impacting transparency and accountability, depending on the existing networks.

Moreover, in the realm of trust-based whistleblowing policies, a contextual and flexible approach is justified. Rather than attempting to rigidly define trust, this research demonstrates the varied and contextually placed definitions of trustworthiness, emerging from routine practices, rather than predetermined a priori notions (Mahama and Chua, 2016; Vandekerckhove *et al.*, 2016). Emphasising the

actions and knowledge employed in the search, development, maintenance, or destruction of trust, the study offers valuable insights into the functioning of such policies.

Recognising the shortage of process-oriented research in whistleblowing contexts (Brown *et al.*, 2014; Langley and Tsoukas, 2016; Brennan, 2020) advocate for a deeper exploration of the relationship dynamics surrounding whistleblowing throughout its entire lifecycle. Whistleblowing, when viewed from this perspective, is no longer seen as an isolated act but rather as a phenomenon that arises from the collective actions and routinized practices of various actors, including both human and nonhuman entities. By adopting a process and situated practice lens, we unlock new avenues to dig into the complexities and differences of whistleblowing (Langley *et al.*, 2013; Brown *et al.*, 2014; Mahama and Chua, 2016).

Through this conceptual shift, our understanding of whistleblowing expands, urging us to explore the interplay between human and nonhuman agency, organisational structures, and the broader socio-technical context in which whistleblowing unfolds. By adopting whistleblowing as an ongoing process and situated practice, we enrich our understanding, opening the way for deeper insights and more informed approaches to studying and addressing this critical issue.

As we dig into the complex dynamics that define whistleblowing, a more comprehensive perspective emerges. This perspective becomes instrumental in formulating effective strategies to promote ethical conduct and accountability within organisations and society as a whole. By recognising the complex net of interactions and influences, we are better equipped to foster an environment that encourages transparency and responsible behaviour. Adopting this broader viewpoint allows us to develop comprehensive solutions and policies that foster a culture of integrity and trust, benefiting both organisations and the larger society.

The ANT perspective involves starting from the study of the network relationships that exist within an embedded organisation and of the process dynamics present within this network. At this point it is appropriate already to mention something about the relation between theory and methodology. ANT's theoretical nature encompasses a methodological orientation. Laughlin (1995) categorises approaches to research partly by their degree of openness to the empirical field. ANT is by this category relatively open. It reflects elements summarised in this paragraph, but it is concerned within that to find things out from the field. It seeks to minimise dogma and theoretical pre-conception. We return to this later.

## 3 Methodology and Theorisation

### 3.1 Overview

This chapter employs Actor-Network Theory (ANT) to explore whistleblowing processes, trust dynamics, and organisational management control systems. Anchored in a methodological theme of Middle-Range Thinking, the chapter unfolds through sections introducing ANT's core concepts, ontological and epistemological aspects, Callon's three translation stages, and trust as a dynamic practice. These insights are then applied to analyse how whistleblowing translates across macro and micro levels, emphasising the role of trust. The chapter also evaluates ANT's strengths and weaknesses in this context. Doing so offers a roadmap for disentangling complex organisational interactions, contributing to a deeper understanding of whistleblowing's interconnected dimensions and its ties to management control and trust dynamics.

### 3.2 Methodological theme – Middle-Range Thinking

We noted above that Actor-Network Theory (ANT) was a relatively open theory. In this section, we give more attention to tracing out other key dimensions of it that shape its methodological orientation and its method preferences (see Laughlin, 1995; Gallhofer, Haslam and Yonekura, 2013). As previously stated, in this regard, this study draws on ANT because of its focus on theorising both human and non-human actors (Banks, 2011).

A significant shift in empirical accounting research took place in the 1970s. The reason for this shift is the perception that many of the normative ideas that emerged from the analysis of that period were not ready for practical use. The proposed design of accounting systems seemed to have nothing to do with current practices. In the hope of designing meaningful normative systems, many scholars have demanded a detailed description to understand the performativity of current accounting practices. Then it is possible to understand how these accounting systems should be changed (Laughlin, 1995).

The endeavours of the economic and behavioural schools in accounting opened up the demand for this thinking about empirical research. This led to the emergence of a Positive Accounting Theory (PAT) that explains why accounting system is as it is, why accountants do what they do, and what the effects of these phenomena on people and resources are. Hopwood (1979) appreciated these endeavours and scholars have been aware that we know little about the actual performativity of accounting systems in organisations. This deliberately shifted away from quantitative analysis and became one of the essential common points to qualitative school researchers (Laughlin, 1995).

Due to the diversity of theoretical and methodological approaches, a dispute arose between schools of thought. The inevitable temptation amid researchers is assuming theoretical and methodological concerns will overcome in the course of the study while collecting the data. To some extent, it may be considered valid, but if this approach is followed, research may have little disadvantage. However, there is a particular advantage and importance of making clear choices before undertaking any research. Because "all empirical research will be partial [and incomplete], despite any truth claims to the contrary, and thus it would be better to be clear about the biases and exclusions before launching into the empirical detail" (Laughlin, 1995, p. 65).

Burrell and Morgan (1979)s' theoretical framework had inspired many scholars in accounting research. Their 2-by-2 matrix based on 2-bipolar continuums helped for understanding wider streams of approaches undertaken in the empirical analysis. According to Laughlin, the paradigm of Burrell and Morgan assumed away complexity. It is too simplistic and implicitly omitted many of the critical domains for choices. In terms of three continua, Laughlin reflects theoretical-methodological stances. These are three all-inclusive

categorical dimensions, identified with ‘theory’<sup>25</sup>, ‘methodology’<sup>26</sup> and ‘change’. Each dimension is categorised into three levels ‘high’, ‘medium’ and ‘low’ as summarised below:

[1] The *theory* band includes a mixture of the level of prior theorisation and previous theories that can be legitimately presented to empirical research. The high level of prior theorising assumes that the material world exists independently of human experience and waiting to be discovered. Therefore, truth claims that there is only one reality and exists outside of the individual mind. Despite the empirical variety, the high-level theory claims to have a high generalisation and ordered structure of the phenomena under investigation. On the other hand, at the far extreme, the low level of prior theorising assumes away the distinction between the world and the individual projections. The world is not material, but the reality exists in each mind and creates a unique version of reality. Thus, truth claims multiple realities. Therefore, the generalisation is not possible. While low-level theory appreciates empiric detail in a particular context and phenomenon, it does not enjoy the knowledge of any other empiric detail, as this detail becomes a theory of its own.

[2] The *methodology* band has to some extends the theoretical definition that forms the nature of the method, and implicitly has implication for the role of the observer. The high-level methodology assumes that the observer plays no part in the investigatory process. On the contrary, the observer is essential and always plays a crucial role in the empirical research of the low-level theorists. However, it does not mean the low-level methodology is rules-free, but it has less constraint as compared to the high-end continuum. The rules are not written in formal codes; because of the fear of restricting the observer’s freedom as his/her subjectivity and variability in perceptual powers are essential in forming the foundation of this way of seeing.

[3] The *change* dimension concerns about the emphasis given to critique of status quo and need for change in the investigated phenomenon. The high-level change believes that everything is unsatisfactory, imperfect and subject to change, even though they do not always be able to bring about the desired change. From another standpoint, low-level change has little problem in maintaining the current situation.

While these continuums can be defined in such simple terms, it is essential to note that they contain a mixture of very complex variables as indicated above. It must also be emphasised that the descriptors of ‘high’, ‘medium’, and ‘low’ cannot be accurate, defined or measured. The stance of the schools of thought concerning the ‘theory’, ‘methodology’ and ‘change’ advocates that understanding empirical research is partial and incomplete (Laughlin, 1995). There is no comprehensive approach to understanding the social world. Although the endeavours of Immanuel Kant and Auguste Comte to amalgam between the old schools (rationalists and empiricists) they were also criticised about claiming absolute truth about the reality for their chosen approach. Despite the claims, the picture of reality they produce is partial and incomplete. Thus, “arguably, neither of these routes provides an easy or obvious solution to the problem of choice” (Laughlin, 1995, p. 78). Therefore, Laughlin (1995) presented the Middle-Range Thinking (MRT) in the hope of reaching to middle-point rather than fighting on one far extreme. In addition, MRT is a way forward for new and well-established researchers to defending and convincing the academic community about their research worthiness. The alternative approaches, Comte and Kant/Fichte, hold the position high/high and low/low on the theory and methodology, respectively. At the same time, both posit a low level of change, but for different reasons. Before proceeding into MRT, it is crucial to evaluate the high and low levels of each dimension ‘theory’, ‘methodology’ and ‘change’ in terms of strengths and weaknesses. This assessment is not claimed as an absolute conclusion, but rather as a value-laden assessment (see Table 1).

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<sup>25</sup> The theory elucidates the extent of ontological reality and epistemological foundation. It represents a synthesised adaptation of Burrell and Morgan's (1979) conceptualisation regarding the nature of social science.

<sup>26</sup> The methodology blends the observer's role in the discovery process with the essence of the method itself. It represents a fusion of the underlying assumptions about human nature and the methodological framework presented in Burrell and Morgan's (1979) paradigm.

Dimensions	Theory		Methodology		Change	
Level	High	Low	High	Low	High	Low
Strengths	Generalisation leads to learning from other theoretically informed situations	Appreciating the diversity and empirical details	Making the perceptual rules public and understanding the phenomenon uncontaminated by observer	Allowing openness in the discovery process	Allowing to change situation	Maintain current situation
Weaknesses	Arguing away diversity and contextual details	Denying commonality and restricting to learn from other situations	Tightening the role of observer and limiting the perceptual categories	Lack of clarity	Arguing nothing is right (unstable situations)	Arguing nothing is wrong with anything

The MRT holds medium/medium/medium levels on all bands ‘theory’, ‘methodology’ and ‘change’. Although MRT believes that the material world exists distinctly from human projections, it does not deny the subjective bias in understanding the investigated phenomena. Therefore, MRT still enjoys learning from other experiences and situations. MRT also recognises that the generalisation of reality is possible but skeletal. Thus, empirical details are of importance to MRT to flesh the body of the skeletal theory. The empirical details contribute to making the skeletal generalisation meaningful and complete within a specific context. For the methodological dimension, MRT does not prohibit the role of the observer. However, MRT designs less strict methodology in such a way that accepts the subjective perceptual powers and their diversity in practice while assures and sets skeletal rules for the discovery process. The methodology is, therefore, flexible in one part and constrained in the other. The more balanced view, which calls for a more sophisticated model of change, lies at the heart of MRT’s change continuum. MRT’s medium stance is open to the possibility of maintaining the current situation, while at the same time, allowing openness to change where necessary.

From a theoretical, methodological and change perspective the medium position of MRT preserves the strengths of both the ‘high’ and ‘low’ levels while avoiding the weaknesses of both as indicated in the above table. Although Laughlin’s MRT preserves the strengths of the methodological theme, it does not pay much attention to the ‘emergence’; however this is considered to be a significant issue in empirical research (Llewelyn, 2003). Llewelyn (2003) warned researchers about the danger of too developed a theorisation at the beginning: “Empirical case studies using grand theorisation can become merely carriers of an identical prior understanding and, hence, any distinctive new themes [such as ‘emergence’] in empirical work can be missed, as they are pre-emptively absorbed into the pre-existing theoretical framework” (Llewelyn, 2003, p. 685). According to Llewelyn (2003), MRT marginalised ‘hunches’ and ‘insights’ that would be regarded as level one ‘metaphor theories’ or two ‘differentiation theories’. In addition to that, MRT tends to exclude unique events, looking towards recurrent aspects of social life, but “there can be much to learn from things that only happen once” (Llewelyn, 2003, p. 686) – historical research recognises the value of researching unique incidents, this may reflect the less ‘theoretical’ nature of many historical investigations.

Following from the above argument, Laughlin’s MRT is outdated and suffering omissions such as Actor-Network Theory (ANT) (Gallhofer, Haslam and Yonekura, 2013). Understanding the ‘emergence’ is in the heart of the ANT (Latour, 2005). This study, therefore, is a way forward to Laughlin’s MRT. The

fundamental elements of ANT and the ‘emergence’ concerning the whistleblowing policy are discussed in the following section.

### 3.3 Actor-Network Theory – theoretical lens

Numerous studies have used Actor-Network Theory (ANT) to understand the social implications of relationships (Callon, Law and Rip, 1986; Justesen and Mouritsen, 2011; Lukka and Vinnari, 2011). According to Callon (2001), the fact that the term Actor-Network Theory mainly incorporates the two words ‘actor’ and ‘network’ can be considered to be reminiscent of the traditional tensions at the centre of social sciences. This includes the relationship between an agency and its structure (Callon, 2001). Additionally, ANT can also be observed to focus on the overall function of technology and on the ways human actors operate within their networks alongside their non-human counterparts (actants), which include software, hardware, and social networking (Baxter and Chua, 2018). This specific theory is further perceived to confer agency to actants in order to reflect on the interrelationship between agency and structure.

#### 3.3.1 Ontological foundations

**Actants have agency** – In the context of ANT, actants play a crucial role in understanding and defining agency. ANT views agency as the capacity to act, which is contingent on an actor’s relationships with other actors within the network (Law, 1999). It is important to differentiate between human and non-human actants, as agency is not limited to human beings alone<sup>27</sup>. The concept of agency implies that it relies on both actors and actants. Non-human actants are considered ontologically real and capable of exercising agency, although they do not have intentions like human actors (Baxter and Chua, 2018).

ANT also explores the different forms in which actants exercise their agency (Latour, 2005). Actants can act as intermediaries, facilitating the transmission of effects from one actor to another, such as an email system that delivers messages. In this role, actants enable others to act. Actants can also act as mediators, transforming messages as they pass between actors. For example, actants can serve as indicators of employee performance, measuring and translating it into exam methodology to obtain various information or meanings. Regardless of their role, actants generate effects and exercise agency in specific capacities. Misunderstandings and disagreements can arise when recipients interpret messages differently from the sender’s intentions, highlighting the transformative power of actants like the email system (Baxter and Chua, 2018).

Furthermore, ANT emphasises the need for symmetrical accounts that consider both social and natural aspects of practice (Baxter and Chua, 2018). When accounting for agency, it is crucial not to privilege one over the other. Power is dispersed and must be identified within the network. Actors are heterogeneous and conditional entities, and their agency is only significant if it makes a difference in the world (Chapman, Chua and Mahama, 2015). ANT has consistently engaged with actants to understand how accounting technologies, such as calculations, tables, reports, performance measures, and information systems, emerge and generate effects (Modell, Vinnari and Lukka, 2017). Therefore, a whistleblowing framework can be regarded as an actant endowed with agency within the network of actors and actants.

**Simultaneity/reflexivity** – The concept of agency in ANT emphasises the relational and material nature of individuals’ abilities to act. Understanding agency becomes challenging when individuals are isolated from their network relationships. Their capacity to act is determined by the relationships they have with other

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<sup>27</sup> For example, if a group of people are chatting, socialising and talking around a table, the table is playing a role in the socialising. The table determines their positions and how they speak, so that they can hear each other well. They are making references and communicating about the papers on the table; therefore, these are material devices which are facilitating interactions.

elements in their network, also known as Action Nets (Czarniawska, 1997). For example, if Adolf Hitler had acted alone, his power would have been significantly diminished. His influence derived from mobilising relational resources and positioning himself at the centre of a network of relationships, which granted him authority to act<sup>28</sup>. The ability to mobilise specific relational resources can enhance an individual's capacity to act. In essence, the ability to act is closely tied to the capability to leverage certain relational resources within a network (Baxter and Chua, 2018).

According to ANT, understanding how agency is exercised requires following the relationships among actants. This involves examining the emergence and instantiation of these relationships and digging into the micro dynamics of actants' interactions. By doing so, we can gain insights into why certain individuals hold positions of power (Chapman, Chua and Mahama, 2015). ANT suggests that capturing the interconnected collective actions that contribute to outcomes necessitates following the relational agency that exists among dispersed actants (Czarniawska, 2004). In the context of an organisation's whistleblowing framework, this raises questions about how the framework may influence operational aspects. We particularly interested in the information conveyed in a whistleblowing framework and the subjective meanings and perceptions it generates.

### 3.3.2 Epistemological commitments

From an ANT perspective, the effectiveness of a whistleblowing framework cannot be universally applied across all organisations. This is because the framework operates within networks that consist of both social and technical elements. The ability of non-human actants to promote transparency and accountability relies on the specific networks in which they are embedded. Therefore, the context in which a whistleblowing framework emerges plays a crucial role in its implementation and impact. To understand the effects of a whistleblowing framework, we must study the networks within organisations and examine the dynamics within these networks. This includes investigating how the framework interacts with other elements in the network and the reciprocal effects they have on each other. It is through this examination that we can assess the effectiveness of a whistleblowing framework in a particular organisation. Consequently, generalising the impact of whistleblowing framework is not feasible. ANT aims to achieve "generalised symmetry" by avoiding asymmetrical assumptions about causal relations between actors and actants (Latour, 2005), challenging the notion that technology has inherent qualities and meanings independent of its context (Phoenix, 2015). Whistleblowing framework itself is actant, and it is essential to uncover how it exercises its agency and generate effects within its specific context. In this case, the effects primarily involve enhancing accountability. As a whistleblowing framework is implemented within an organisation, it will both change and be influenced by the dynamics of the network it operates within (mutual translation; see Law, 1992).

### 3.3.3 Critical perspective

The translation of a whistleblowing framework is influenced by network dynamics. This translation can take various forms, including policy revisions and reinterpretation of its meanings. While a whistleblowing framework is crafted with specific intentions, others may reinterpret and translate it differently. The emergence of a whistleblowing framework is a response to corporate governance failures within an

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<sup>28</sup> For example, in the Soviet Union, the authority came from communism and the relationships mobilised around it. When those relationships dissipated, the power no longer existed. Also, monarchies around the world are based on how they maintain relationships between them, which keeps them in power (Solnick, 1996). Certain empires have collapsed because they could not hold these relationships. It is about being able to hold the relationships together for a long time that defines power; not because an individual is powerful. From a more political point of view, in the last 20 years, some very powerful people who were in power have seen their power collapse, for example, Muammar Gaddafi in Libya. Gaddafi kept himself in a position of power for 40 years because he maintained relationships, but something happened in these relationships. There were multiple relationships, and coming back to the notion of weak ties, relationships with his own people, the relationship with the rest of the GCC, and the relationship with the West. Some relationships had broken down, but he still maintained power for a while; then when the rest of his relationships started to become shaky, his powerful position disappeared, because those relationships negated his powerful position.



organisation, addressing 'matters of concern'. These concerns create a sense of unease, discomfort, and negative energy within the organisation. According to ANT, such concerns are identified as issues that require attention (Latour, 2004). A whistleblowing framework does not spontaneously emerge on its own; there are underlying factors that lead to its development. These factors may indicate potential problems within the organisation's governance, questioning the accountability of the board of directors in their supervisory role. It is in these circumstances that a solution is sought, leading to the implementation of a whistleblowing framework that can complement or supersede the board's supervisory role, assisting in addressing corporate governance failures. Baxter and Chua (2018) argue that ANT maintains a critical stance by advocating for emancipation in a distinct manner. ANT seeks to emancipate society from prematurely naturalised objectified facts, challenging black boxes that are taken for granted and no longer questioned or counteracted. ANT engages in problematizing accounting facts, recognising the need for critical analysis. The introduction of a whistleblowing framework marks the initial step, and its effectiveness depends on the existing networks of relationships at the time of implementation.

Furthermore, the framework's capacity to bring about change is contingent upon how whistleblowing actors and actants, such as whistleblowers, report recipients, wrongdoers, whistleblowing reports, investigators, and organisations, interpret and respond to the framework. It is evident that a whistleblowing framework alone is insufficient; it must collaborate with these actors and actants to generate effects. The concept of relational materiality becomes relevant here, as the whistleblowing framework alters some network dynamics within the organisation while also being influenced by them. This highlights the critical nature and potential of ANT. Empirical research findings can shape change and policy, aligning with a critical orientation, as emphasised by Baxter and Chua (2018).

### 3.4 Callon's three stages of translation: matters of concern and continuous experimentation

In ANT, nothing is fixed or predetermined, with most of our actions being an experiment. We experiment when we confront '*matters of concern*' (Callon, 2009). When we encounter a problem or an issue which does not have an immediate solution, it becomes a matter of concern to us. Therefore, we problematize it by drawing on things that we are familiar with and situating the issue within that context. This crystallises in our heads as a problem or 'concern', which needs to be addressed (Callon, 2007). Matters of concern are not listed in sequence. They are identified and taken up by a variety of actors both existing and new, human and nonhuman. When we encounter matters of concern, ANT posits that there are no predetermined solutions (Callon, Lascoumes and Barthe, 2009); therefore, we use the three stages of problematization to find a solution (Callon, 2007; Callon, Lascoumes and Barthe, 2009).

#### 3.4.1 The three stages of translation: an overview

The translation process comprises three stages: problem disentanglement, analysis, and implementation. In the first stage, problems are isolated from their complex network of relationships and transferred to a controlled laboratory environment. Known as Translation 1, this stage involves moving problems from the complex macro world to a quieter micro world. By conducting experiments in the laboratory, researchers gain insights into the problem's properties and potential solutions. Reduction and simplification techniques are employed to facilitate this translation process (Callon, Lascoumes and Barthe, 2009).

For instance, in a laboratory experiment, bacteria samples are collected, placed in a test tube, and manipulated to observe their behaviour. ANT recognises the challenges of extracting bacteria from the macro world, necessitating simplification and reduction. Technologies aid in the transformation, allowing problems to be distilled into manageable qualities. In business, accounting serves as a valuable tool for simplifying complex situations into financial statements and evaluative indicators (Callon, Lascoumes and Barthe, 2009).

Similarly, in complex projects like building construction, the translation process involves reducing the project to its essential elements for cost analysis. Technological aids streamline the examination of large-scale objects. This abbreviated representation is then analysed to identify cost-related issues and explore design modifications. The translation process facilitates problem-solution analysis within a controlled micro environment (Callon, 2009).

Translation 1 requires significant reduction and simplification. Exclusions are made during the problem's isolation, and both the excluded and included elements are crucial (Callon, Lascoumes and Barthe, 2009). When the solution is reintroduced to the macro world, it interacts with new elements and may generate additional problems. ANT emphasises the continuous nature of experimentation (Callon, 2009).

Successful problem isolation and mobilisation in the micro world rely on material devices. Accounting, for example, simplifies business operations into financial statements, but it may exclude certain elements such as customer satisfaction and interpersonal interactions. The second stage of translation, analysis, breaks down problems into manageable pieces for repackaging. For instance, organisations may need to modify raw materials to address cost-related issues. However, achieving a comprehensive solution remains an aspiration (Callon, 2009).

The third stage of translation involves implementing the solution in the macro world. This stage requires a transition from the microcosm to the macrocosm, as actions take place in the macro environment. Problems identified and examined in the micro world are then reintegrated into the macro world. For example, during the COVID-19 pandemic, scientists studied the virus in laboratories and developed potential solutions<sup>29</sup>. Testing these solutions in the real world often leads to new problems or complications. Reintegrating the solution into the macro world is complex and does not guarantee problem resolution. The interaction between the solution and the macro world may generate further problems, leading to a continuous process of experimentation (Callon, 2009).

In an organisational context, ANT challenges the notion that once a reliable solution is found, additional expenses are unnecessary. Ongoing challenges and the emergence of new issues necessitate continuous experimentation with solutions. The exclusion of certain relationships from the macro world often gives rise to these issues. Weak ties, despite receiving less attention, are equally important as they can significantly impact overall problem-solving effectiveness (Granovetter, 1973; Callon, Lascoumes and Barthe, 2009).

Considering a broader social perspective, ANT recognises the importance of reducing extreme poverty<sup>30</sup>. The complexity of societal dynamics often requires the extraction and disentanglement of connections. Ignoring these relationships may lead to the emergence of new concerns. ANT views the translation process as an ever-evolving scaffold, constantly in flux (Gehman, Treviño and Garud, 2013). Material devices, such as controls, play a crucial role in establishing trust and facilitating interactions within routines (Mahama and Chua, 2016). ANT emphasises the relational character of these devices and recognises that the social construct extends beyond human bodies (Latour, 2005; Baxter and Chua, 2018).

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<sup>29</sup> As an example, COVID-19 interrupted human life in many ways, affecting e.g., the markets, businesses and shops from Wuhan to New York. However, scientists took a sample of the virus into a laboratory and tried to break it down to understand its properties, such as how it behaves in different conditions. To understand those properties, different treatments were applied to attempt to kill it or find a vaccination against it in the laboratory. This was the first stage translation. In the second stage translation, a possible solution was developed. The solution then had to be returned to the real world, as it worked in the laboratory, but it needed to be tested in the real world to see if it worked there. In the course of creating the solution, other problems may also have been created, such as side-effects of the vaccine. On the other hand, it may not work because the solution has connections which are more complicated than what is happening.

<sup>30</sup> For example, if we look at it from a broader social viewpoint, it is in the interest of society, not to have extremely poor people, even in a capitalist society like America. It is not in the interest of the country to have too many poor people working for very rich people, because if they have the riches and enjoy the riches, and they have wealth for people, they are those who turn into a revolution, and then they may have to guard their houses with guns. Thus, riches can come back to bite, creating discomfort for the rich and making it difficult for them to enjoy their wealth. Therefore, traditionally in the Western world, they provide social welfare, giving the minimum for accommodation and food in the welfare system. Then rich people sleep comfortably and others sleep comfortably.

To encapsulate, the three stages of translation provide a comprehensive framework for problem-solving within the macro and micro worlds. The first stage involves disentangling and isolating problems from the macro world, enabling a deeper understanding of their properties. Material devices, such as management control systems, aid in the reduction and simplification of complex issues. The second stage focuses on analysis, breaking down problems into manageable components for repackaging and potential solution development. Finally, the third stage entails implementation in the real world, with challenges arising from the reintroduction of solutions into the macro environment. Weak ties are recognised as essential, alongside their stronger counterparts, as they can significantly impact the overall strength of a solution. ANT emphasises the continuous and dynamic nature of the translation process, highlighting the importance of experimentation and the involvement of material devices in establishing trust. By understanding the complex relationships between humans and non-humans, ANT provides valuable insights into problem-solving and decision-making processes.

### 3.4.2 Trust as practice

In the realm of social sciences, the concept of trust has been explored in connection with the distributed agency of human actors. According to Latour (2005) and Callon (2007), human agency is not solely determined by individuals but is distributed across various elements such as tangible objects, texts, discourses, skills, competences, and routines. However, the significance of routines and calculative practices in their work has not been widely linked to a broader shift in social sciences (Mahama and Chua, 2016). Practices, as defined by Reckwitz (2002), encompass routinized behaviours involving bodily activities, mental activities, the use of objects, background knowledge, and emotional states.

Trust plays a vital role in enabling the occurrence of solutions (Saunders, Skinner and Lewicki, 2010). While administrative controls<sup>31</sup> serve as a technical formal control, trust operates as an element of social cultural control<sup>32</sup>. Both technical and social controls function as devices that facilitate the performance of solutions (Malmi and Brown, 2008). Therefore, the effectiveness of administrative controls is not solely dependent on its technical aspects, but also on the extent to which people trust that it captures all the relevant aspects from the macro world and transports them to the micro world. Technical and social controls complement and sometimes substitute for each other (Abdullah and Khadaroo, 2020; Outila *et al*, 2020).

The relationship between management control systems and trust is a crucial consideration. While trusting may eliminate the need for administrative control, administrative control itself can be instrumental in building trust<sup>33</sup>. When an organisation's management control systems demonstrate transparency and provide clear practices, it instils confidence and gradually fosters trust. However, the notion of trust as a process and situated practice has yet to gain widespread support (Power, 2015; Mahama and Chua, 2016). This study defines trust as an achievement that is socially constructed through the actions and routinized practices of multiple actors, both human and non-human.

By conceptualising trust as a practice, the focus shifts to the routine nature of trust-building. Trust encounters challenges when new elements emerge that influence the dynamics of trust and distrust. Management control system is one of the factors that can influence trust, as it reveals important information about relationships (Reckwitz, 2002; Malmi and Brown, 2008; Saunders, Skinner and Lewicki, 2010). Thus, the connection between management control systems and trust becomes a significant consideration.

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<sup>31</sup> Administrative controls govern employee behaviour, ensure accountability, and promote efficiency in organisations. They encompass organisation design, governance structures, and policies (Malmi and Brown, 2008).

<sup>32</sup> Cultural controls are vital systems used by managers to regulate behaviour based on shared values, beliefs, and social norms within the organisation, encompassing value-based, symbol-based, and clan controls to foster a cohesive and ethical organisational culture (Malmi and Brown, 2008).

<sup>33</sup> For example, if a father gives his son money to do shopping and if the father trusts his son, he is not going to take a piece of paper and account for everything. Therefore, trusting is associated with an absence of performance monitoring.

This study seeks to move away from perceiving trust as a static noun and instead positions it as an active practice and achievement. Therefore, trust is an extension of ANT.

The extension of Actor-Network Theory (ANT) further enhances the translation process within networks. ANT views networks not as linear models but as complex structures where the ability to influence depends on the position of elements within the network. Mobilising resources and placing them in the right position at the right time amplifies their influence (Callon, Lascoumes and Barthe, 2009). Trust plays a role in this process, as it is essential for other parts of the network to allow accountants to practice. Power within networks is not inherent but relational. It relies on mobilising and maintaining relationships over time (Solnick, 1996; Pianezzi and Grossi, 2020).

ANT emphasises the influence of relationships on power and agency (Baxter and Chua, 2018). Management control system, as a material device, gains power through its ability to mobilise relationships within organisations. However, when these relationships break down, management control system becomes a matter of concern (Mahama and Chua, 2016). Therefore, accountants often acquire knowledge and skills in various disciplines to enhance their decision-making power<sup>34</sup> (Lowe and Doolin, 1999; Hopper and Bui, 2016). The ability to insert oneself into the network and mobilise accounting data, knowledge, and people determines power.

In the translation process, the ability of a solution to have influence upon its return to the macro world depends on the relationships between elements in the macro. This process involves experimentation and the exclusion of certain elements. However, the excluded elements can give rise to new problems, becoming additional matters of concern (Callon, Lascoumes and Barthe, 2009). Material devices, acting as intermediaries or mediators, undergo transformations during the translation process. The successful transportation and transformation of these devices have implications for stability, as disorder can emerge from transformations in the macro and reductions in the micro world (Latour, 2005).

To wrap up, trust is a dynamic and situated practice that involves the distributed agency of human and non-human actors. Management control systems and trust are interconnected, with management control systems playing a role in both technical and social control. ANT provides insights into the power dynamics within networks and emphasises the importance of relationships in influencing agency and the translation process. Trust and management control systems are integral components of this process, shaping the understanding of trust as a practice and the complexities involved in its implementation and maintenance.

### 3.4.3 The translation of whistleblowing, trust and management control systems

Whistleblowing plays a crucial role in organisations, and its translation from the macro world to a framework document in the micro world is a complex process (Pianezzi and Grossi, 2020). During translation, contextual elements are decontextualized, disentangled, and incorporated into the whistleblowing framework. However, this process often leads to reductions, exclusions, and transformations, potentially rendering the framework incomplete. The effectiveness of the framework depends on its ability to mobilise resources from the macro to the micro world and back. Simply placing the framework in proximity to other elements is not enough; it must comprehensively cover a wide range of aspects to have a significant influence. The framework's success in addressing whistleblowing cases is influenced by the transformations that occur during translation.

When the whistleblowing policy is implemented in the macro world, it enters the organisation to combat corrupt and illegal practices. While the policy may fulfil its purpose, the effectiveness is determined by the

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<sup>34</sup> Accountants learn other subjects in order to take decisions, which gives them a lot of power. For example, they insert themselves into healthcare, by introducing casemix accounting. They use it to study body parts and cost body parts, which has changed hospital administration. Now accountants call the shots. Most hospitals are run by accountants and business managers in the UK. If we look at the hospital trust 'the trust network', they call the shots in the background, and there is huge confusion between accountants and doctors, so that doctors now learn accounting and business (Lowe and Doolin, 1999; Hopper and Bui, 2016).

elements that were excluded during its development. Exclusion is a social phenomenon that occurs during the first and second stage translations (Pianezzi and Grossi, 2020). The first stage involves gathering information about organisational focus areas, while the second stage translates this information into a policy document (see Figure 4). However, certain relationships and connections that were excluded from the policy can significantly impact its efficacy. The presence or absence of these elements defines the strengths and weaknesses of the policy to act.

Actor-Network Theory (ANT) recognises the complexity of the relational network in the macro world (Callon, Lascoumes and Barthe, 2009). The whistleblowing policy, as a network of relationships, may not cover every single aspect due to the inherent incompleteness of controls (Pianezzi and Grossi, 2020). Leakages may occur in the translation process, affecting the policy’s ability to act (Callon, 2007). The enactment of the policy in the macro world depends on how many elements come together and are maintained over time.

Trust is essential for the whistleblowing policy to be effective (Seifert, Stammerjohan and Martin, 2014). If top management does not pay attention to allegations, employees may hesitate to blow the whistle and there will be no action taken against wrongdoings. Building trust in the policy is crucial, as mere assurances of confidentiality may not be enough. Actions from top management are necessary to create a sense of protection and confidence. Without outcomes and explanations, reporting may be considered useless, leading to a lack of trust in the system (Vandekerckhove *et al.*, 2016). Trust influences the extent to which the policy can effectively address whistleblowing cases.

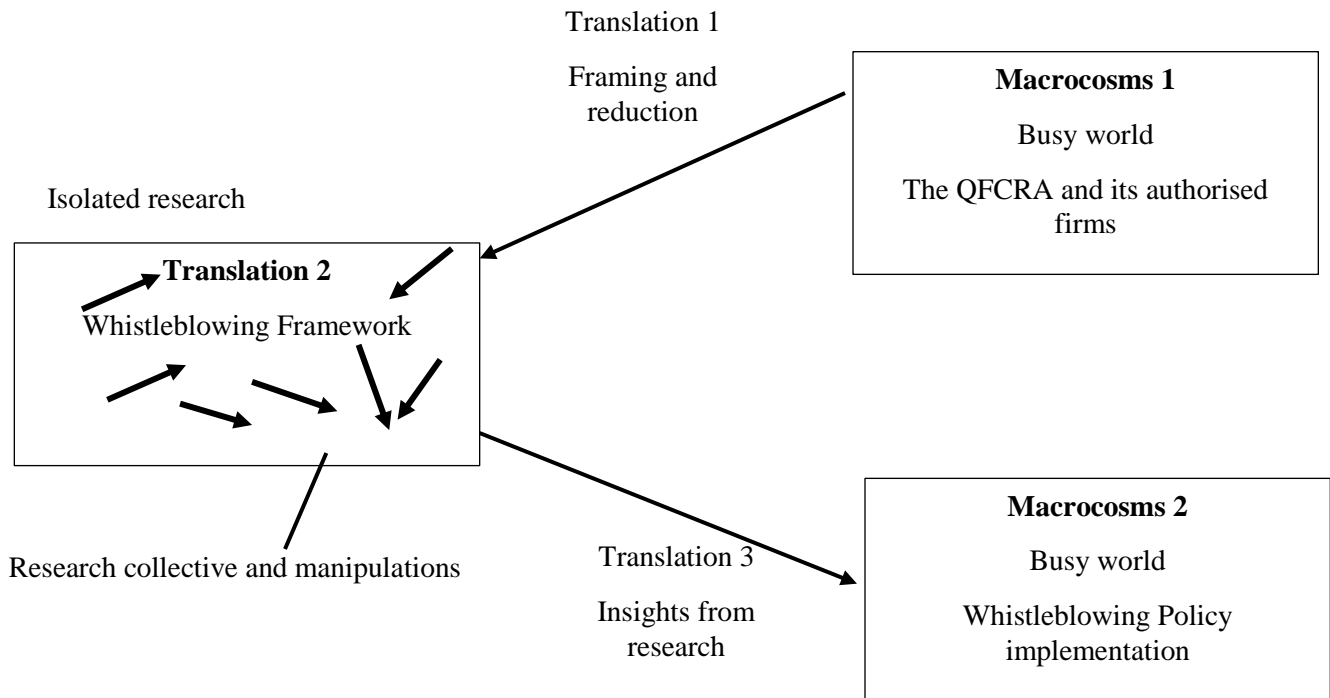


Figure 4: Callon’s three stages of translation for whistleblowing (adopted by the author)

Trust is not a static entity but a dynamic process and practice (Reckwitz, 2002; Vandekerckhove *et al.*, 2016). Some organisations may adopt whistleblowing policies as symbolic gestures without actual impact (Brennan, 2020). To differentiate between symbolic and instrumental policies, a comprehensive

understanding of the whistleblowing framework's emergence is necessary (Brennan, 2020; Pianezzi and Grossi, 2020). Critical and situational analyses shed light on the processes and elements involved in framework development. The implementation of whistleblowing policies may require a balance between administrative and cultural controls (Abdullah and Khadaroo, 2020; Outila *et al.*, 2020). Cultural controls, such as shaping the organisation's architecture and establishing risk management and compliance cultures, complement formal administrative controls (Malmi and Brown, 2008).

The whistleblowing policy is not merely a piece of paper (Brennan, 2020); it is a network of diverse elements that come together to define its functionality (Pianezzi and Grossi, 2020). The policy's ability to act depends on the relationships between various elements, including changes in organisational structure, the management control systems, and top management's tone. Viewing the whistleblowing policy as a network of relationships provides insights into its effectiveness and interactions with other components.

This study aims to understand the emergence of the whistleblowing policy, the implications for formal controls, and the dynamics of the network when the policy is enacted. The investigation focuses on how elements are related, reinforced, and interconnected within the policy. The policy's effectiveness is determined by its connection with other elements and its ability to exercise agency. By studying this network, new insights can be gained into the complex nature of whistleblowing practices and the entanglement of management control systems and trust practices. Trust as practice offers an alternative perspective, moving beyond static conceptualisations of trust and opening avenues for further exploration.

To wrap up, the translation of whistleblowing, trust, and management control systems is a multifaceted process that involves the mobilisation of diverse elements. The whistleblowing policy functions within a network of relationships, and its effectiveness is contingent upon the comprehensive coverage of elements and the establishment of trust. Understanding the emergence, enactment, and implications of the policy contributes to a deeper understanding of whistleblowing practices and the complex interplay between management control systems, trust, and organisational dynamics.

### 3.5 Unpacking the strengths and weaknesses of Actor-Network Theory

This study combines a practice perspective (Reckwitz, 2002) and Actor-Network Theory (ANT) (Latour, 2005; Callon, Lascoumes and Barthe, 2009) to gain new theoretical insights into whistleblowing processes (Brown *et al.*, 2014). ANT diverges from Institutional Theory by considering both human and nonhuman actors and recognising that organisational structures and actions are not fixed, but emerge and achieve temporary stability through translation processes (Modell, Vinnari and Lukka, 2017). Stability is viewed as a temporary condition, and a more dynamic and performative understanding of organisational processes is needed to understand their functionality (Langley *et al.*, 2013). This perspective shifts the focus from viewing whistleblowing as a single event (Brown *et al.*, 2014) or symbolic artefact (Brennan, 2020) to understanding it as a process situated within networks (Langley and Tsoukas, 2016).

A practice perspective, rooted in a relational ontology, is central to this study (Latour, 2005). It entails tracing the heterogeneous assembly of social and material elements into action networks (Czarniawska, 2004), treating success/failure, subjects/objects, humans/nonhumans, and micro/macro in a symmetrical manner (Latour, 2005). It also highlights the mobility of practices across different contexts and invokes the concept of translation to explain the efforts required when performing "ostensive rules" (Callon, 1984; Callon, Law and Rip, 1986; Latour, 2005). By examining the controversies that arise in action, the study aims to understand the central whistleblowing processes.

ANT, unlike Institutional Theory, encompasses a mix of relationist, realist, and constructivist propositions, emphasising the concepts of actor, network, and translation (Modell, Vinnari and Lukka, 2017). Actors in ANT include diverse and contingent elements, both human and nonhuman, that have the ability to act and exercise agency (Callon, 2001; Latour, 2005). Nonhuman actors, such as accounting technologies, play a

significant role in ANT studies and illustrate their emergence and effects (Modell, Vinnari and Lukka, 2017). The term “actor-network” refers to both an actor that networks disparate pieces and a network that can reproduce and modify itself (Callon, Lascoumes and Barthe, 2009). Actors and relationships in ANT are dynamic and constantly redefined through networked interactions.

ANT’s focus on action and linkages diverges from the conventional emphasis on clearly defined actors and stable structures in Institutional Theory. It does not distinguish between the devices and methods used to study reality and reality itself (Latour, 2004). ANT is considered a vital counterpoint to mainstream theorisations of accounting practice as it blurs the boundaries between human and nonhuman actors and offers different directions for accounting research (Baxter and Chua, 2018). ANT’s situational approach recognises the emergence and instantiation of a whistleblowing policy within specific contexts.

While ANT offers valuable insights, it also has limitations. Its practical application can be challenging due to the requirement for in-depth examination of actor-object relationships. Critics argue that ANT is too descriptive, lacks sufficient explanatory power, and does not provide a clear basis for evaluating truth or validity. Additionally, ANT’s narrow focus on the micro-level and its perceived apolitical and ahistorical nature have been subject to criticism. To overcome these weaknesses, researchers can develop clear guidelines, balance the role of human and nonhuman actors, integrate complementary methods, and critically engage with power relations and social inequalities (Modell, Vinnari and Lukka, 2017). By addressing these limitations and adopting effective strategies, researchers can leverage the strengths of ANT to gain a deeper understanding of complex social interactions and contribute to the study of whistleblowing processes. Through rigorous research practices and a comprehensive analysis of actor networks, ANT offers valuable insights into the complex dynamics that shape our social world.

## 4 Method

### 4.1 Overview

The primary objective of this study is to answer the fundamental question: “Why and how do organisational networks (processes of whistleblowing policy as accountability mechanism) emerge, develop, and decline or change significantly over time to meet practice at the organisational level in the context of the QFCRA to suppress fraud and wrongdoings?” To achieve this, the research will employ a case study research design, incorporating semi-structured interviews, archival document analysis, and observations. By collecting longitudinal qualitative data, the study aims to gain a comprehensive understanding of the whistleblowing process and its implementation within the QFCRA.

The case study research design allows for an in-depth exploration of the emergence, development, and transformation of organisational networks related to whistleblowing policy (Langley *et al.*, 2013; Brown *et al.*, 2014). Through semi-structured interviews, valuable insights will be obtained from key stakeholders involved in the whistleblowing practices. The analysis of archival documents will offer historical context and facilitate an in-depth exploration of the whistleblowing process. Additionally, the observations will provide valuable insights into the dynamics and interactions within the QFCRA, complementing the interview data and documents analysis.

By utilising this comprehensive methodology, the research seeks to uncover the underlying processes and mechanisms that contribute to the effectiveness of whistleblowing practices in combating fraud and wrongdoings (Maroun and Solomon, 2014). The longitudinal nature of the data collection enables the identification of patterns and trends over time (Langley *et al.*, 2013), providing valuable insights into the evolution and impact of whistleblowing policies within the QFCRA. Ultimately, this study aims to contribute to the enhancement of accountability mechanisms and the promotion of ethical practices within the organisation. The study aims to address the following particular questions:

1. *Why and how does the whistleblowing framework emerge?*
2. *How does whistleblowing framework perform in its strategy and process of operation as an accountability mechanism to suppress fraud and wrongdoings?*
3. *What are the impacts of any significant changes?*

The subjectivism and openness of the approach shapes the focus of the research and method preferences (Laughlin, 1995; Gallhofer, Haslam and Yonekura, 2013). Here, they lead the researcher towards a case study research design as elaborated below, consistent with prior ANT research. See Figure 5: Formulating the research design that incorporates philosophy, strategy, and methods.

In the following sections, we highlight the justifications for using a qualitative research design, specifically case study research. We acknowledge the significant value that case study research brings in providing valuable insights and contributing to knowledge (Yin, 2003). Unlike prior studies that often reduce complex interrelationships to mere variables, case study research digs deeper into these complexities. By exploring real-life situations in their contextual richness, case studies offer a more comprehensive understanding of the whistleblowing policy’s emergence and performativity (Langley *et al.*, 2013; Brown *et al.*, 2014). Through our research, we aim to leverage the power of case study methodology to uncover hidden connections and gain different insights that go beyond simplistic variable analysis. This approach allows us to generate meaningful and actionable knowledge that contributes to the broader body of research in the whistleblowing field.



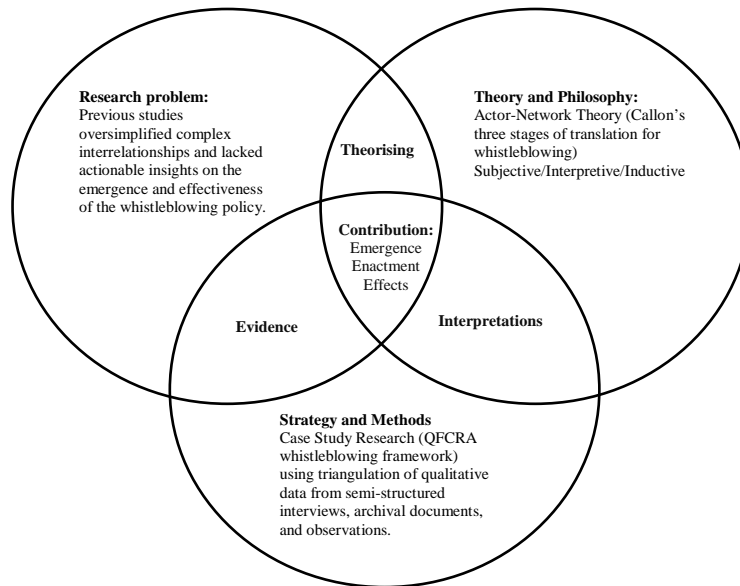


Figure 5: Formulating the research design

## 4.2 Understanding the case study through qualitative research

The use of a qualitative approach has mostly been related to case study research as well as to ‘interpretive’ schools of thought (Creswel, 2009). Subsequently, the use of qualitative methods in scientific study has expanded in different fields due to the potential to describe attitudes and processes in a holistic way in the context (Eriksson and Kovalainen, 2015).

The method definitions are different based on [1] the purpose and focus on how individuals understand and experience the world. [2] The association with interpretivists and subjectivists stance of reality. [3] The data collection methods and analysis, such as interviews, archived documents, and observations (Guest, Namey and Mitchell, 2017).

Instead of narrowing the research and its methodology in the lines of paragraphs, in an attempt to outline the basics of qualitative research, this study will focus on the primary uses of qualitative research as well as its advantages and disadvantages:

[1] Qualitative research focuses on how individuals interpret, understand, experience, create or shape the world. Some of the fundamentals that qualitative research understands, such as social meanings, interpretations, processes and practices, are vital and can be found in the social world (Eriksson and Kovalainen, 2015). Therefore, this research helps us to consider the social climate of the local society in the QFCRA and how these fundamentals act in the reporting of wrongdoing, investigation and protection during the whistleblowing process.

[2] Qualitative analysis utilises flexible and adaptive data processing approaches for the social context in which the data are generated. Qualitative analysis can evolve from its context and adjust to specific data. To this end, the qualitative analysis does not utilise narrowly hierarchical and rigid approaches that can neglect the real-life conditions in which they are implemented. This flexibility and openness help the environment and background of the analysis to pay attention to the fundamental elements that affect the development, understanding and meaning of the results, which can be overlooked by the use of rigid standardised approaches that cannot be adjusted to their social context (Creswel, 2009; Eriksson and Kovalainen, 2015). Due to contextual, political and cultural factors, this flexibility and adaptability are considered essential in this research. The emergence, development and death of whistleblowing processes

have not been explicitly researched under the context of accounting fraud and have therefore been mostly unexplored.

[3] Qualitative research seeks to generate broad, descriptive, complex, different, and context data-based understandings (Eriksson and Kovalainen, 2015). Based on a holistic view of analysis and interpretation, the attention to information and the comprehensive review for this study by considering how the human and non-human actors of the research environment may influence and shape whistleblowing processes.

Many approaches are available for the researcher to collect, analyse and interpret qualitative data (Creswel, 2009). This research focuses on the case study research design and thematic inductive analysis as one of the favoured qualitative methods to answer the research questions and the study's objectives in the best manner.

Typically, qualitative approaches require more time to gather, record, document, transcribe and analyse the data than quantitative ones (Eriksson and Kovalainen, 2015). Therefore, when developing this form of a qualitative study, the time factor is taken seriously into account. To meet time constraints while still attaining research objectives, sometimes, the modification could involve the allocation of time and data amount.

Despite the advantages and characteristics of the qualitative methods that would benefit the results of the research, the generalisability of the results is limited. The variance analysis approach is not feasible since the study of smaller samples is carried out in greater detail, to draw trends and more critical sample correlations (Guest, Namey and Mitchell, 2017).

### 4.3 Case study research

As previously noted, ANT stands as an assemblage of hybrid and heterogeneous groupings in which both humans and non-humans are inextricably intertwined (O'Connell *et al.*, 2014; Mahama *et al.*, 2016). Whistleblowing is a multifaceted phenomenon influenced by various actors including the whistleblower, the report, the wrongdoing, the report recipient, the response, the company, the investigator, and the outcomes (Gao and Brink, 2017; Lee and Xiao, 2018). The case study method enables us to examine the whistleblowing process within the specific organisational context of the QFCRA. By focusing on the QFCRA as the case study site, we can uncover this organisation's unique dynamics, policies, and practices related to whistleblowing. This method allows us to identify the processes that influence whistleblowing within the QFCRA, explore different types of professionals and their practices, and explore the development and aftermath of the whistleblowing framework. By digging into the complexities of whistleblowing, we aim to provide a comprehensive understanding of the phenomenon and its implications within the QFCRA.

#### 4.3.1 Understanding the rationale behind case study research

Classic case studies<sup>35</sup> are methodologically aligned with interpretative, ethnographic, and field research traditions (Dyer and Wilkins, 1991). In contrast to experimental, quantitative, and deductive research approaches prevalent in business research, which strive for statistical generalisations, case studies take a distinct approach. They emphasise the exploration and interpretation of individual cases, focusing on the unique characteristics and contextual dynamics that provide rich insights (Eriksson and Kovalainen, 2015).

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<sup>35</sup> Intensive case study research is rooted in qualitative and ethnographic research traditions, placing significant emphasis on the interpretation and understanding of the case under investigation. This approach goes beyond surface level observations and digs into the complex nets of cultural meanings and sense-making processes within specific contexts. While extensive case study research adopts the principles of empirical, quantitative, and positivist inquiry. Its focus lies in identifying common patterns, mechanisms, and properties within a specific context to facilitate theory development, elaboration, or testing (Eriksson and Kovalainen, 2015).

By exploring the complexities of specific cases, case studies enable a different understanding that goes beyond mere statistical generalisations.

The case study method was selected for its capacity to offer a comprehensive understanding of the complex aspects of whistleblowing. In contrast to surveys or experiments<sup>36</sup> employed in prior whistleblowing studies, which may lack evidence-based practice, case study method digs into the essence of practices and their contextual application, encompassing resource-related processes and dynamics (Langley *et al.*, 2013; Brennan, 2020). This in-depth exploration can yield original evidence that supports the necessary for change (Laughlin, 1995).

The primary objective is to gain a deep understanding and exploration of the case by exploring its dynamics and perspectives of the individuals involved. This approach does not imply a lack of theoretical grounding or the inability to contribute to theory development (Eriksson and Kovalainen, 2015). On the contrary, as Dyer and Wilkins (1991) suggest, classic case study research is both theoretically informed and capable of advancing theoretical frameworks. However, the primary focus lies in understanding the complexities of the specific case rather than testing predetermined theoretical propositions.

By adopting a case study methodology, researchers can immerse themselves in the case and uncover valuable insights from within. This approach allows for a different understanding of the unique context, perspectives, and interactions that shape the case. Theoretical frameworks provide a foundation for interpretation and analysis, guiding the exploration of underlying patterns and relationships within the case. However, the primary emphasis remains on capturing the richness of the case itself, rather than solely using it to confirm or challenge existing theories (Eriksson and Kovalainen, 2015).

This study will adopt a case study design for several compelling reasons. Firstly, the case study approach allows for the development and acquisition of “interactional expertise” by engaging with specialists who have valuable knowledge about the technical aspects of whistleblowing (Langley *et al.*, 2013; Brown *et al.*, 2014). This engagement is crucial in gaining a comprehensive understanding of the dynamics within the whistleblowing context, which is central to the objectives of this study.

Secondly, the case study design provides deep access to whistleblowing practices, ensuring that the perspectives, activities, and interests of specialists are duly considered. The emphasis on reflexivity is vital in managing the complex and ongoing interactions that occur within a whistleblowing setting (Langley *et al.*, 2013). This focus on reflexivity is central to this study’s methodology.

Thirdly, the case study design enables a fine-grained understanding of the challenges and complexities of whistleblowing at the micro and macro levels (Langley *et al.*, 2013). By digging into the micro and macro level dynamics, this approach uncovers the differences and fluctuations inherent in whistleblowing practices. This detailed understanding is crucial for this study’s objectives.

Moreover, the case study design allows for a contextual understanding of the whistleblowing environment, taking into account its social and cultural complexities (Brown *et al.*, 2014). This comprehensive view ensures that the research captures the broader factors that influence whistleblowing behaviours and outcomes.

Furthermore, the case study design facilitates a profound exploration of behaviours and perceptions related to whistleblowing (Eriksson and Kovalainen, 2015). By employing this methodology, the study gains insights into the complex workings of whistleblowing, going beyond theoretical frameworks and exploring the practical realities of the phenomenon.

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<sup>36</sup> Previous studies have used different research approaches, such as survey questionnaires regarding whistleblowing (e.g., Brown, Hays and Stuebs, 2016; Alleyne, Hudaib and Haniffa, 2018; Latan, Ringle and Jabbour, 2018), its respective scenarios (e.g., Brennan and Kelly, 2007), experiments (e.g., Guthrie and Taylor, 2017; Andon *et al.*, 2018) and other approaches like archival (e.g., Lee and Fargher, 2013; Baloria, Marquardt and Wiedman, 2017). These methods elucidate some insights; however, it is challenging to uncover strong dilemmas.

Additionally, the case study design serves to bridge the gap between whistleblowing theory and its actual practice. This methodology enables an exploration of how theory translates into real-world contexts, providing valuable insights for theory development and practical applications (Langley *et al.*, 2013; Brown *et al.*, 2014; Eriksson and Kovalainen, 2015).

Finally, the case study design encompasses multiple research methods, allowing for the comparison of results, reducing bias, and ensuring credibility and trustworthiness (Berry and Otley, 2004). By employing a combination of methods, such as interviews, document analysis, and observation, the study achieves a robust and comprehensive analysis of the whistleblowing phenomenon. This methodological rigour enhances the validity and reliability of the research findings.

The adoption of a case study design in this study offers numerous advantages, including the acquisition of interactional expertise, deep access to whistleblowing practices, a fine-grained understanding of micro and macro level dynamics, contextual insights, exploration of behaviours and perceptions, bridging theory and practice, and methodological robustness. However, the case study method also has some limitations. It focuses on specific cases, which may limit the generalisability of findings to broader populations. Furthermore, it requires extensive time and resources to collect and analyse data, making it a more intensive research approach (Near and Miceli, 1985; Yin, 2003). Despite these limitations, the benefits of employing the case study method outweigh the drawbacks for our research on whistleblowing (Brown *et al.*, 2014; Eriksson and Kovalainen, 2015). The advantages strengthen the study's ability to disentangle the complexities of whistleblowing and achieve its research objectives effectively.

## 4.4 Data collection

Fieldwork research was conducted over an eight-month period in 2021, covering from January to August, to gather the necessary data. This involved formal interviews with 13 participants, as well as informal discussions and the collection of secondary data from online sources available on websites and offline sources from the fieldwork documents such as PowerPoint and press release.

The process involved scheduling and conducting interviews with participants, transcribing and analysing the interview data, and systematically analysing the relevant documents and observations. Challenges may have included scheduling difficulties, potential biases in participant responses, limited access to certain documents, or the need to ensure confidentiality and anonymity of participants.

### 4.4.1 Data collection methods

The data collection methods used in this research include triangulation of semi-structured interviews, document analysis, and observation (Duriau, Reger and Pfarrer, 2007; Creswel, 2009; Brown *et al.*, 2014). Each data collection method was chosen to align with the research questions and objectives. Interviews provide rich and in-depth qualitative data, allowing for a deeper exploration of the complexities and differences of whistleblowing framework development within the QFCRA. Document analysis provides objective documentation and supports the analysis of the organisational context and policies. Observation complements the interview and document analysis by capturing real-time behaviours and interactions, providing valuable contextual insights into the whistleblowing process.

The data collection methods have their advantages and limitations. Interviews allow for in-depth exploration and clarification of participants' perspectives, experiences, and motivations (Creswel, 2009). Document analysis provides access to written records that may contain critical information about the organisational whistleblowing practices (Duriau, Reger and Pfarrer, 2007). Observation allows for a direct examination of behaviours and interactions (Brown *et al.*, 2014). However, limitations may include potential biases in participants' self-reporting during interviews, access limitations to certain documents, and the need for proper interpretation and contextual understanding during observation.

To ensure the reliability, validity, and credibility of the collected data, a funnel strategy was employed. This involved implementing lower structured methods such as informal conversation in the research process, particularly during the initial exploratory stages (Hoque *et al.*, 2017). By adopting this approach, the data collection process was able to maintain a robust level of quality and accuracy.

#### 4.4.2 Going beyond the traditional dichotomy of whistleblowing studies

This study goes far beyond the traditional division of whistleblowing vs. silence, which is typical of most accounting-related whistleblowing studies (Brown *et al.*, 2014). In practice, this study does so by explaining responses other than silence or whistleblowing in an exploration aimed at understanding the process of whistleblowing through organisational dynamics (anonymous channel, protection, and investigation processes). The qualitative methods of in-depth interviews, document analysis, and observations conducted within the QFCRA seem particularly appropriate for this study. These methods involve a holistic perspective designed to provide insights into the complexity of the professional environments in which whistleblowing decisions are made. In-depth interviews, document analysis, and observations enable the enactment of in-built triangulation methods (which combine several types of data collection that supplement and validate each other) (Brown *et al.*, 2014). This combination of different qualitative approaches will lead to a more comprehensive and holistic view of the decision-making process of whistleblowing at the organisational level in the QFCRA.

##### 4.4.2.1 Interviews

Case studies employ open-end narratives ‘narrative interviews’ or life histories to capture dynamic processes (Eriksson and Kovalainen, 2015). By adopting the call for research on process patterns in whistleblowing irregularities, this study enriches the literature and uncovers the contextual differences that influence whistleblowers’ decision-making processes (Brown *et al.*, 2014). To achieve this, in-depth analysis is necessary, considering the contextual factors.

This approach proves especially suitable for studying process patterns and the environmental conditions that shape them, as it offers vibrant and detailed descriptions of group and organisational dynamics, leading to comprehensive insights (Brown *et al.*, 2014; Eriksson and Kovalainen, 2015). Tracking the decision-making processes through the whistleblowing journey allows for the identification of process patterns underlying reporting issues (Berman, 2007).

The analysis employs a narrative approach, inviting respondents to share their experiences in response to whistleblowing policy procedures. Therefore, careful attention is given to the contextual factors and decision-making processes embedded in these narratives (Brown *et al.*, 2014). Edwards (2008) advocates for a paradigm shift in the study of wrongdoing reporting, urging a focus on the processes of context and sense-making rather than viewing it as a singular event. This necessitates research methods beyond experiments and surveys (Berman, 2007). Edwards (2008) proposes the diary method, aligned with narrative research, to gain a deeper understanding of decision-making processes and examine temporal sequences of events and employee reactions.

To analyse the narratives, the process tracing method is employed. Process tracing seeks to identify patterns, exploring the sequential events and observable implications (George and Bennett, 2005; Friedrichs, 2016). This comprehensive approach allows for the identification and exploring the intervention mechanisms and theories regarding the interaction of processes (Steel, 2004; Brown *et al.*, 2014).

##### 4.4.2.1.1 The criteria for selecting participants

The interview meetings with QFCRA staff related to whistleblowing were arranged by the Associate Director of the QFCRA Enforcement Department. In coordination with her, a comprehensive list of

interviewees from various departments, including enforcement, supervision, authorisation, and policy, was provided. The Associate Director also facilitated scheduling, considering the availability and locations of the participants. Due to the COVID-19 pandemic, all interviews were conducted online through Microsoft Teams to ensure the safety and well-being of everyone involved. For further details on the arrangements made by the Associate Director, please refer to Appendix 4. Additionally, Appendix 5 contains the semi-structured interview questions utilised during the interviews.

The interviewees from the bank operating under the QFC authority were arranged through the personal connections of the Policy Director at the QFCRA. Leveraging his professional network, the Policy Director facilitated the scheduling and coordination of these interviews. On the other hand, the researcher took the responsibility of arranging interviews with the representatives from Big-4 audit firms authorised by the QFC. Through direct communication and collaboration, the researcher established contact and organised the interviews with these individuals. This collaborative effort ensured a diverse range of perspectives and insights in the study.

The sample comprised individuals who were involved in whistleblowing processes within the QFCRA. Recruitment strategies such as purposive sampling or snowball sampling may have been employed (Noy, 2008). The sample aimed to be diverse and representative, capturing a range of perspectives and experiences related to whistleblowing.

The sample population for this study consisted of 13 participants who took part in both individual and group interviews. Specifically, 7 participants completed individual interviews, while 6 participants engaged in group interviews. All interviews were precisely recorded and subsequently transcribed for analysis. To facilitate organisation and analysis, the interview transcripts were uploaded to NVivo 12 Pro, a software specifically designed for qualitative data management. Each participant was assigned a unique identifier to ensure confidentiality and anonymity. On average, the interviews lasted approximately 53 minutes. For a detailed overview of the interview characteristics, refer to Table 2.

The sample aligns with the research questions and objectives by providing insights into the whistleblowing phenomenon within the specific context of the QFCRA. By including participants with varying job positions and experiences, the sample enables a comprehensive exploration of the emergence of the whistleblowing framework, its performativity process, and its outcomes within the organisational setting.

Recruiting participants for the study posed challenges and limitations, including concerns over confidentiality, limited availability of specific individuals, and potential biases in participant self-selection. Gaining access to whistleblowing activities in the field proved difficult due to their confidential and secretive nature (Brennan, 2020). Additionally, the number of interviewees, particularly those outside the QFCRA, was limited due to the sensitive subject matter and the impact of the COVID-19 pandemic. The study employed effective recruitment strategies to address these challenges, upheld ethical considerations, and prioritised participant confidentiality.

Table 2: Interview transcript characteristics			
Participant	Length of interview (minutes)	Type of Interview	Company Type/Department
Participant 1	50	Group Interview	The director of prudential supervision (QFCRA Supervision Department)
Participant 2	50	Group Interview	The Associate Director, Investment Manager, Advisor and Securities Supervision (QFCRA Supervision Department)

Participant 3	50	Group Interview	Associate Director of Anti-Money Laundering and Combating Financial Crime (QFCRA Supervision Department)
Participant 4	38	Group Interview	The Associate Director (QFCRA Enforcement Department)
Participant 5	38	Group Interview	Senior Associate (QFCRA Enforcement Department)
Participant 6	38	Group Interview	The director of the enforcement department (QFCRA Enforcement Department)
Participant 7	55	Individual Interview	The director of the Policy department (QFCRA Policy Department)
Participant 8	93	Individual Interview	Assistant Manager of Internal Audit in a Big-4 audit firm under the QFC authority
Participant 9	58	Individual Interview	Internal Audit Manager in a Big-4 audit firm under the QFC authority
Participant 10	61	Individual Interview	Senior associate of internal audit in a Big-4 audit firm under the QFC
Participant 11	41	Individual Interview	Partner in a Big-4 audit firm under the QFC
Participant 12	65	Individual Interview	The Compliance Officer in a QFC- authorised bank
Participant 13	48	Individual Interview	The HR manager in a QFC- authorised bank

#### 4.4.2.1.2 The selection of the case study sites

The criteria for selecting the QFCRA as the case study site included its significance as a regulatory authority, its relevance to the research questions, and its accessibility for data collection. The selection aimed to ensure a diverse and representative case study sites that captures the complexities of whistleblowing within a regulatory context. Refer to the ‘Company Type/Department’ column in Table 2 to access information regarding the selected sites.

The process involved conducting a comprehensive review of potential case study sites, considering their alignment with the research objectives and their willingness to participate in the study. Challenges may have included obtaining permission and cooperation from the QFCRA, as well as potential limitations due to the specific context and accessibility of the organisation.

The selected case study sites align with the research questions and objectives by providing a real-world context in which whistleblowing occurs. By focusing on the QFCRA, the research can gain insights into the unique organisational dynamics, policies, and practices related to whistleblowing. This alignment enhances the relevance and applicability of the research findings.

Overall, intensive case study research crafts an attractive narratives that digs into the complex interplay of various contextual factors (Dyer and Wilkins, 1991). By exploring the whistleblowing framework within the QFCRA, this research sheds light on its performative aspects and effects. It uncovers motivations, experiences, and outcomes, offering valuable insights into the effectiveness, challenges, and implications of the policy framework’s emergence.

#### 4.4.2.2 Document analysis

Document analysis involves examining written records, such as reports, policies, memos, emails, and other textual materials, to extract valuable insights and information (Durliau, Reger and Pfarrer, 2007). In the context of the study on organisational whistleblowing practices, document analysis plays a significant role (Brown *et al.*, 2014). The fieldwork offers access to written documents that hold crucial information about how whistleblowing is addressed within the QFCRA. These documents can include whistleblowing policies, reports, press release, PowerPoints, communication channels (whistleblowing E-Form), and any other relevant materials (see Appendixes 8-12).

By conducting an in-depth analysis of these documents, researcher gains a deeper understanding of the whistleblowing practices within the QFCRA. The researcher can identify patterns, trends, and gaps in the implementation of whistleblowing policies, as well as assess the effectiveness of existing practices.

Document analysis allows researcher to examine the language used in these documents (Durliau, Reger and Pfarrer, 2007), identify key stakeholders involved in the whistleblowing process, and uncover any inconsistencies between stated policies and actual practices. It provides a comprehensive view of the organisational context and sheds light on the decision-making processes and actions taken in response to whistleblowing.

#### 4.4.2.3 Observations

Besides interviews and documents analysis, observations (see Appendix 6) play a vital role in case study research as a data collection method (Eriksson and Kovalainen, 2015). In a case study focusing on ethical decision-making in police work and labour inspection services, Loyens (2012) highlighted the benefits of combining observations, interviews, and informal communication in three key areas.

Firstly, Loyens (2012) found that during the observation period, a foundation of mutual trust was established between the researcher and the participants. The informal conversations that ensued had a profound impact on the subsequent in-depth interviews. Participants felt comfortable sharing aspects of their work and personal lives that they may not have divulged to a stranger. Remarkably, Loyens (2012) discovered that these conversations led participants to disclose highly sensitive internal matters, such as internal scandals involving employee misconduct, shedding light on their decision-making processes.

Secondly, participants felt compelled to discuss sensitive issues because they believed the researcher had already been informed about them through conversations with their colleagues during the observation phase. This motivated them to present their side of the story and provide a comprehensive account.

Lastly, the presence of the researcher over an extended period instilled confidence in the participants, encouraging them to offer reliable and accurate information about their work. Participants recognised that the researchers extended presence made it less likely for inaccurate or incomplete information to go unnoticed.

Observations complements other data collection methods, such as interviews and document analysis, by providing additional evidence and supporting the analysis of the research findings.

Reflecting on the above, the researcher contacted the policy director at the QFCRA through LinkedIn direct messages. With a LinkedIn account displaying a golden premium badge, signifying authenticity, the researcher was able to establish credibility and build trust. Prior to the meeting, the researcher discovered that both he and the policy director had studied at the same university, fostering a shared connection. During the introduction meeting, they talked about their time at the university, including their professors and experiences in the courses. These shared moments helped relieve tension and sensitivity surrounding the topic of whistleblowing, allowing the policy director to feel more comfortable sharing information. As a result, the policy director introduced the researcher to the rest of the team at QFCRA, including the compliance officer from a bank under the QFC's authority, who played a crucial role in the study.



It is worth mentioning that the researcher also worked as an adjunct lecturer of accounting at Northumbria University, Qatar campus, from January 2021 to January 2022. This branch of the university has a partnership with Qatar Finance Business Academy (QFBA), which is affiliated with QFC. When conducting interviews with QFC members, the researcher disclosed his affiliation with Northumbria University-QFBA. This information fostered a sense of belonging and trust, with one interviewee even considering the researcher as part of their team. These stories and connections played a vital role in building confidence and encouraging interviewees to share information openly and without hesitation.

By leveraging interviews, document analysis, and observation and informal communication, researcher can access valuable insights and foster openness among participants, ultimately enriching the depth and quality of the study. This research method uncovers not only the visible aspects of the whistleblowing framework but also the underlying cultural and structural influences that shape its emergence and impact. It offers a deeper understanding of the complexities involved and lays the foundation for evidence-based recommendations and improvements in whistleblowing practices within the QFCRA.

#### 4.4.3 Data recording and transcribing

The data was recorded using suitable equipment such as audio recorders or digital note-taking tools during the interviews. This ensured accurate capturing of participants' responses, allowing for later analysis and interpretation. The chosen equipment was based on its reliability, ease of use, and the ability to record high-quality audio or written notes.

Data transcription was performed to convert the recorded interviews into written text format. Transcription software "Otter" was employed to enhance efficiency and accuracy. The choice of transcription tools and services was based on their reliability, security, and compatibility with the recorded data.

Challenges or limitations encountered during the data recording and transcription process may include technical issues with recording equipment, difficulties in transcribing certain accents or expressions, and the time-consuming nature of transcribing lengthy interviews accurately.

#### 4.4.4 Potential biases and steps taken to mitigate them

Potential biases that may have influenced the data collection process include researcher bias and participant bias. Researcher bias refers to the subjective interpretations or preconceived notions of the researcher that may influence the data collection, analysis, and interpretation. Participant bias refers to participants' tendency to provide socially desirable responses or withhold certain information (Creswel, 2009).

To mitigate biases, several steps were taken. Firstly, multiple data collection methods, such as interviews, document analysis, and observation, were employed to triangulate the data and ensure a more comprehensive understanding of the whistleblowing phenomenon. Additionally, member checking, where participants were given the opportunity to review and verify their responses, was conducted to enhance the credibility and accuracy of the data. The researcher also maintained reflexivity by critically reflecting on their own biases and assumptions throughout the research process.

Despite these mitigation efforts, it is important to acknowledge that biases may still exist to some extent. Participants may selectively disclose or withhold information, and the interpretation of data may be influenced by the researcher's perspectives and assumptions (Creswel, 2009). These biases and limitations should be considered when analysing and interpreting the research findings.

### 4.5 Thematic Analysis

#### 4.5.1 The process of thematic analysis

When doing qualitative research, the thematic analysis identifies and analyses broad themes, concepts, and meanings within a dataset. It involves a systematic and rigorous process of organising and interpreting the data to generate insights and understandings related to the research questions and objectives (Braun and Clarke, 2006).

The process of thematic analysis begins with familiarising oneself with the data through repeated readings and immersion. Then, initial codes are generated by identifying meaningful data units and labelling them with descriptive codes. These codes are then organised into potential themes based on their similarities and relationships. Themes are reviewed, refined, and defined through continuous analysis cycles, ensuring coherence and consistency. Finally, the themes are named and supported with representative quotes or examples from the data (Braun and Clarke, 2006).

#### 4.5.2 Analytical framework

The analytical framework used in the thematic analysis provides structure and guidance for organising and interpreting the data. It includes coding schemes, categories, or themes that emerge from the data and help identify meaningful patterns and relationships.

##### 4.5.2.1 Description of the analytical framework

Drawing inspiration from Callon's three stages of translation (Callon, Lascoumes and Barthe, 2009), the analytical framework of this study incorporates a skeletal theory (Laughlin, 1995; Gallhofer, Haslam and Yonekura, 2013). This framework comprises pre-defined coding schemes, categories, or themes that have been carefully developed to align with the research questions and objectives. By employing this systematic approach, the analysis of data can be conducted in a focused and structured manner, allowing for meaningful insights to emerge. The coding schemes, categories, or themes act as guiding principles, ensuring that the research remains aligned with its intended purpose and objectives. This framework serves as a valuable tool in organising and interpreting the data, facilitating the exploration of key patterns, relationships, and findings within the study. The framework captures critical aspects of whistleblowing, such as emergence, processes, challenges, and consequences, allowing for comprehensive data analysis.

##### 4.5.2.2 Development and modifications

The analytical framework was developed through a continuous process of familiarising the data, generating initial codes, and organising them into potential themes. These codes were refined and expanded through a continuous process as new insights emerged from the data (Braun and Clarke, 2006). Regular discussions and consultations with the supervisors helped refine and validate the framework (Creswel, 2009; Given, 2012). Modifications were made as new codes or themes emerged, ensuring that the framework accurately captured the complexity of the data.

The analytical framework was designed to align with the research questions and objectives by focusing on crucial processes of whistleblowing policy framework, its emergence and performativity within the QFCRA. It enables systematic exploration of the research topics and facilitates the identification of meaningful patterns and relationships in the data.

#### 4.5.3 Limitations to the thematic analysis

Thematic analysis, like any research method, has certain limitations that should be acknowledged and addressed to ensure the validity and reliability of the findings. Possible limitations of the thematic analysis

method include the potential for researcher bias in coding and interpretation, subjectivity in identifying and defining themes, and reliance on the available data for analysis. Other limitations may arise from the dataset’s characteristics, such as variations in participant responses, missing or incomplete data, or the influence of contextual factors on the analysis (Braun and Clarke, 2022).

To mitigate potential limitations, rigorous procedures were followed, including engagement and continuous discussions with the two supervisors about coding and analysing the data. This process allows for coder reliability and helps ensure the objectivity and consistency of the analysis (Creswel, 2009; Given, 2012). Additionally, the researcher maintained reflexivity throughout the analysis, critically reflecting on their biases and assumptions (Braun and Clarke, 2006, 2022). Limitations specific to the dataset were carefully considered, and efforts were made to utilise available data sources effectively and gather additional information if necessary.

#### 4.5.4 Presentation of themes and sub-themes

The thematic analysis identified several themes and sub-themes from the data analysis. These themes provide insights into the research questions and objectives, shedding light on the various processes of whistleblowing within the QFCRA (see Table 3: Alignments between research questions, themes, and data).

Table 3: Alignments between research questions, themes, and data			
<b>The fundamental question:</b> “Why and how do organisational networks (processes of whistleblowing policy as accountability mechanism) emerge, develop, and decline or change significantly over time to meet practice at the organisational level in the context of the QFCRA to suppress fraud and wrongdoings?”			
Research questions	Themes	Sub-themes	Data sources
<b>RQ1:</b> Why and how does the whistleblowing policy emerge?	<ul style="list-style-type: none"> <li>- Translating matters of concern into a ‘solution’</li> <li>- Calculations: developing and evaluating a Whistleblowing Framework</li> </ul>	<ul style="list-style-type: none"> <li>- The matters of concern</li> <li>- The identification of the function responsible for managing fraud cases</li> <li>- The essence of the QFC’s primary operations</li> <li>- The connection between the QFC’s central business activities and the task of addressing fraud cases</li> <li>- Activities to identify trustworthy whistleblowing framework that yield value</li> <li>- Assessing framework statements as standard procedure</li> </ul>	<ul style="list-style-type: none"> <li>- semi-structured interviews</li> <li>- document analysis</li> <li>- observations</li> </ul>
<b>RQ2:</b> How does whistleblowing	<ul style="list-style-type: none"> <li>- Framing the microcosm ‘the</li> </ul>	<ul style="list-style-type: none"> <li>- Beyond mere documentation: a</li> </ul>	<ul style="list-style-type: none"> <li>- semi-structured interviews</li> </ul>

framework perform in its strategy and process of operation as an accountability mechanism to suppress fraud and wrongdoings?	whistleblowing framework'	strategic approach to compliance - Establishing predictability: a strategy for strengthening the Whistleblowing Framework	- document analysis
<b>RQ3:</b> What are the impacts of any significant changes?	- Navigating struggles in the wider context - Towards a robust whistleblowing culture: overcoming struggles and restoring faith	- Technical straggles (protection and investigation) - Cultural straggles (blackballing, awareness, clarity)	- semi-structured interviews - observations

The themes and sub-themes will be presented based on the data analysis. Each theme represents a meaningful pattern or concept that emerged from the participant’s responses. Sub-themes reflect the specific aspects or variations within each theme. Table 4 presents the codebook as extracted from ‘Nvivo’.

Table 4: Codebook		
Name	Files	References
calculating and making whistleblowing framework	9	34
evaluating policy statements	7	16
analysis	3	7
focus on fraud reporting fearless	7	9
identify trustworthy whistleblowing policy	5	18
co-developing the policy	2	4
cooperation with other department	2	2
demonstration and train the supervisors	2	3
sharing information	4	5
formal and informal meetings	3	3
less details	1	2
small familiar set	2	4
effects	6	15
the effects on firms	3	3
the effects on whistleblowers	6	12
accountability and WBP	6	11
framing the microcosm	10	44
documented policy	3	4
spell out the roles and responsibilities of each participating actors	4	11
the philosophy behind the policy document	10	29
fixed whistleblowing framework	5	8
key criteria - what-if scenarios	2	3
motivation - value generating	6	13

open access to the reports - electronic access	3	5
People and WBP	12	78
Influential positions	8	23
leaders tone	5	12
powerful person	7	11
reporter and recipient	12	55
external report recipient	8	13
independent report recipient	8	20
relationship with recipient	4	8
report recipient	1	1
reporter	8	13
Processes	13	215
Investigation	12	81
anonymity hinder investigation	5	8
evidence and investigation	2	2
internal audit and whistleblowing	5	6
investigation arrangements	5	9
investigation outcomes	9	27
investigation resources	8	29
Protection	13	79
anonymity is not guaranteed	8	20
protection resources	8	21
protection via anonymity	7	19
risk of reporting	7	19
Reporting	11	55
alternative forms of communicating the concerns	6	12
reporting arrangements	6	9
reporting time	4	8
what to report	9	26
Struggling in the macrocosm	13	89
back to macrocosm	2	3
struggles	12	86
hiring whistleblowers	3	9
internal controls and whistleblowing	7	17
investigation	4	8
protection	4	6
relationships	4	9
colleagues	2	3
leaders and managers	3	6
reporting channel	1	1
whistleblowing policy awareness	9	32
whistleblowing policy clarity	2	4
translating matters of concerns into a solution	8	40
forming consultation team	2	2
matters of concerns	5	20

process of identification	7	18
identity of the function	5	5
the QFC core business	5	13

Each theme and sub-theme will be explained in ‘chapter 6 Empirical analysis’, highlighting their relevance to the research questions and objectives. The analysis will demonstrate how these themes and sub-themes provide insights into the complexities of whistleblowing, including emergence, processes, challenges, and consequences. The interpretations will be supported by evidence from the data to enhance the credibility and trustworthiness of the findings.

The thematic analysis offers a systematic and rigorous approach to exploring the data and generating meaningful insights about whistleblowing within the QFCRA. By identifying and analysing themes and sub-themes, the analysis provides a comprehensive understanding of the research topic, addressing the research questions and objectives.

The thematic data analysis was not meant to compare the findings to pre-defined hypotheses, as this was an inductive and exploratory study. It was also not the intention to merely report “what happened” in the field. A novel interpretation of “what is going on here” was sought by working at a boundary between emic (meaning-systems used by individuals in the field) and etic (meanings used by the researcher to interpret observations) (Barley and Kunda, 2001; Whittle and Mueller, 2010). A simple repetition of the stories told by respondents is unlikely to contribute much to the creation of a theoretical framework. To this end, the themes and sub-themes employed in this study were generated through an incremental movement between the data and the literature stimulated from ANT.

By assigning sections and sub-sections to the three primary objectives of the study, the analysis chapter was completed and organised. However, the data analysis chapter was performed using an emic methodology in order to allow the voices of participants in the population to be heard in an organised fashion. The data is not offered as factual data, but rather as a presentation of the views, opinions, and constructions of the individuals who participated in the study. The emic strategy was used in order to minimise the impacts of the researcher on the data obtained and to provide the necessary distance between participants and the researcher. In the discussion chapter, an etic technique is used to organise ideas. The analysis chapter outlines the ‘matters of concern’ and the process of translation as per Callon’s three stages of translation.

In seeking to answer the research questions, this study draws on Callon’s three stages of translation (Callon, 2007; Callon, Lascoumes and Barthe, 2009), which inspired and guided the research. Economies and their arrangements are processes which are constructed rather than pre-existing entities which are discovered (Çalışkan and Callon, 2009). In the same vein, whistleblowing policy and its implementation (such as changes in organisational structure, the introduction of new jobs, protecting whistleblowers, investigating whistleblowing reports) are considered accomplishments rather than taken for granted pre-assumptions that existed before the end of the process. Instead, a whistleblowing policy is a socio-technical arrangement (agencement) constructed by and through people and material entities, made up in historically specific ways.

## 4.6 Ethical Considerations

### 4.6.1 Ethical considerations related to the study

Ethical considerations play a crucial role in research, particularly when studying sensitive topics such as whistleblowing. It is important to address these considerations to ensure the well-being and rights of the participants and maintain the integrity of the research process (Creswel, 2009; Eriksson and Kovalainen, 2015; Hoque *et al*, 2017). The study considered ethical aspects such as confidentiality, privacy, and

informed consent. These considerations were identified as essential to protect the participants' identities, rights, and personal information. Throughout the research process, steps were taken to adhere to ethical guidelines. Confidentiality and privacy were maintained by implementing measures to safeguard participants' identities and data. Informed consent procedures were followed to ensure participants were fully informed about the study, their rights, and the potential risks and benefits of participation. Despite efforts to address ethical considerations, potential challenges may have arisen during the research. These challenges could include difficulties in obtaining consent, participant reluctance to disclose sensitive information, or unexpected ethical dilemmas that required thoughtful and ethical decision-making.

#### 4.6.2 Participant confidentiality and privacy

Protecting participant confidentiality and privacy is of utmost importance to maintain trust and ethical standards in the study. Participant confidentiality and privacy were ensured by using pseudonyms or de-identification techniques. Any personal identifiers were removed from the data to minimise the risk of identification. Data obtained during the research were stored securely, following established protocols. Access to the data was limited to authorised researchers, and measures were implemented to prevent unauthorised access or breaches (Creswel, 2009; Eriksson and Kovalainen, 2015). Despite precautions, there is always a potential risk of breaches. Any potential breaches of confidentiality or privacy were promptly addressed by taking appropriate actions, such as investigating the cause, notifying the relevant parties, and implementing corrective measures to prevent further breaches.

#### 4.6.3 Address potential conflicts of interest

Identifying and managing conflicts of interest is essential to maintain the integrity and impartiality of the research. Potential conflicts of interest, such as relationships with participants, were carefully identified and evaluated. These conflicts were recognised as potential influences that could impact the research process and findings. Conflicts of interest were appropriately addressed by disclosing them and managing them transparently. Measures were implemented to mitigate their influence on the research, such as ensuring objectivity and independent analysis (Eriksson and Kovalainen, 2015). Despite efforts to address conflicts of interest, it is essential to acknowledge any remaining conflicts and discuss their potential impact on the research. By acknowledging these conflicts, the study can maintain transparency and ensure the findings are interpreted in an unbiased manner.

#### 4.6.4 The process of obtaining informed consent

Obtaining informed consent is a fundamental ethical requirement in research involving human participants (Creswel, 2009). The process of obtaining informed consent involved providing participants with detailed information about the study, including its purpose, procedures, risks, benefits, and voluntary nature. Informed consent forms were used to ensure participants understood and agreed to participate (see Appendix 7: Consent Forms). Participants were fully informed about the study, including their rights as participants and the confidentiality measures in place. They were given the opportunity to ask questions and clarify any concerns before providing consent (Eriksson and Kovalainen, 2015). There may have been challenges or limitations in obtaining informed consent, such as participants' hesitation or reluctance to participate, or difficulties in reaching certain individuals. These challenges were addressed by employing effective communication strategies and respecting participants' autonomy and decisions.

### 4.7 Method concluding remarks

The method chapter has outlined the research design and methodology employed in this study on the emergence of the whistleblowing framework, its performativity, and effects within the Qatar Financial

Centre Regulatory Authority (QFCRA). The chosen approach, which includes the case study method, thematic analysis, and ethical considerations, provides a robust foundation for investigating the complexities of whistleblowing in a real-world organisational context.

The case study method was deemed suitable for this research due to its ability to offer an in-depth exploration of the whistleblowing phenomenon within the QFCRA. By focusing on real-life cases and interactions, this approach enables a comprehensive understanding of the factors influencing whistleblowing behaviours and the outcomes associated with whistleblowing actions. The analysis will shed light on the emergence of the whistleblowing framework, its development processes, and its implications for the organisation.

Thematic analysis serves as a vital analytical tool in this study, facilitating the identification and interpretation of patterns, themes, and meanings within the collected data. This method allows for a different exploration of participants' perspectives, experiences, and practices related to whistleblowing within the QFCRA. By uncovering and analysing these themes, the study aims to generate valuable insights into the performativity of the whistleblowing framework and its effects on the organisation.

Ethical considerations have been given due attention throughout the research process, ensuring the protection of participant confidentiality, privacy, and informed consent. Steps have been taken to address potential biases and conflicts of interest, ultimately enhancing the validity and reliability of the study's findings. Adhering to ethical guidelines, this research maintains the integrity of the investigation and fosters trust in the research outcomes.

The implications of this methodological approach are significant for both academic and practical purposes. Academically, the findings of this study will contribute to the existing body of knowledge on whistleblowing and organisational behaviour. The insights gained from the in-depth exploration of the whistleblowing framework's emergence, performativity, and effects within the QFCRA can inform future research and theory development in this field.

Practically, the study's findings may provide valuable insights for the QFCRA and other organisations seeking to enhance their whistleblowing policies and practices. Understanding the factors that influence whistleblowing behaviours and the outcomes of whistleblowing processes can assist organisations in creating supportive environments that encourage ethical reporting and protect whistleblowers. Ultimately, this research has the potential to contribute to the development of more effective and ethical organisational frameworks for whistleblowing.

The method chapter has set the foundation for a comprehensive and rigorous exploration into the emergence of the whistleblowing framework, its performativity, and effects within the QFCRA. The selected research design, data collection methods, thematic analysis, and ethical considerations collectively provide a robust framework for exploring the complexities of whistleblowing in an organisational context. The implications of this methodological approach extend beyond academia, with the potential to inform both theory and practice in the field of whistleblowing.

The "empirical analysis chapter" will focus on the specific details of the data analysis process, including the development of themes and sub-themes and their interpretation. The analysis chapter organised data using an emic approach to amplify participant voices. The presented data represents perspectives, not facts. Callon's three stages of translation guided the research, recognising the constructed nature of whistleblowing policy. The study employed thematic data analysis to explore and interpret findings. It aimed to go beyond mere reporting and contribute to theoretical frameworks. This approach considers whistleblowing policy as a socio-technical arrangement shaped by people and materials. Additionally, the chapter will discuss the implications of the research findings and any limitations that may have influenced the study.



Before digging into the analysis of the empirical data, it is crucial to gain a comprehensive understanding of the context in which the research takes place. Next, the context chapter will provide an in-depth exploration of the specific setting, focusing on the significance of Qatar and the Qatar Financial Centre Regulatory Authority (QFCRA). Understanding the unique context of Qatar and the QFCRA is essential for interpreting the research findings and understanding the implications within this specific socio-cultural and regulatory framework. Through exploring the context, we can uncover valuable insights that contribute to a more different understanding of whistleblowing practices and their dynamics in this particular environment.

## 5 Research context

### 5.1 Overview

The research context chapter presents a compelling case for studying whistleblowing within the context of Qatar as an emerging economy and developing country. Qatar's remarkable economic growth, driven by its abundant natural resources and strategic investments, positions it as a prominent player in the global market. However, as an emerging economy, Qatar faces unique challenges in establishing robust governance frameworks and addressing issues related to fraud and misconduct. The study of whistleblowing within this context is crucial as it offers an opportunity to understand the dynamics and complexities of reporting mechanisms in a rapidly evolving economic context. By examining the experiences of accountants, auditors, and professionals facing ethical dilemmas in Qatar, this research aims to contribute to the knowledge base on whistleblowing practices in developing countries. The findings have the potential to inform policymakers, regulators, and organisations in Qatar and beyond, helping to shape more effective whistleblowing policies, enhance transparency, and foster a culture of accountability. By focusing on Qatar as an emerging economy and developing country, this research fills a significant gap in the literature and provides valuable insights into the challenges and opportunities associated with whistleblowing in similar contexts worldwide.

### 5.2 The State of Qatar

Qatar, officially known as the State of Qatar, is an Arab country situated in the eastern region of the Arabian Peninsula in Southwest Asia. It is bordered by Saudi Arabia to the south and has maritime borders with the United Arab Emirates to the east and the Kingdom of Bahrain to the west. Qatar's capital city is Doha, and it spans an area of 12,000 square kilometre (IMD, 2019).

With a population of 2.8 million in 2019, Qatar is home to over 85 different nationalities, reflecting its diverse cultural context (QFC, 2019). This high-income country boasts the world's third-largest reserves of natural gas and oil, which serve as essential pillars of its economy (United Nations, no date). The United Nations has classified Qatar as a nation with very high human development, making it the most advanced Arab country in terms of human development (United Nations, no date).

Qatar's impressive economic performance is evident in its GDP per Capita, which stands at a remarkable US\$128,537—the highest in the world according to IMD (2019). The country also boasts an exceptionally low unemployment rate of 0.1%, making it one of the lowest in the world. Moreover, Qatar's commitment to economic growth is exemplified by its US\$34.9 billion in direct investments and its impressive ranking of 10th out of 63 countries in the Global Competitiveness Report 2019 (QNA, 2019). It is the second-highest ranked country in the Middle East and North Africa region.

Qatar has emerged as a significant player in the Islamic finance market, positioned as the fifth largest market globally. The country's banks hold approximately US\$120 billion in assets, experiencing a growth rate exceeding 10% (QFC, 2019). Furthermore, Qatar's dedication to infrastructure development is evident in its US\$200 billion government investment programme, aligned with the objectives of the Qatar National Vision 2030<sup>37</sup> (QFC, 2019). In line with its economic aspirations, the Qatar Government established the Qatar Financial Centre (QFC) in 2005 to foster economic growth and development.

Qatar's strategic location, thriving economy, cultural diversity, and commitment to sustainable development have positioned it as a leading nation in the region. With its abundant natural resources,

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<sup>37</sup> In 2008, the Government of Qatar established the pillars of Qatar Vision, which include four main pillars (Human, Social, Economic, and Environmental) development (Government Communication Office, 2019).

remarkable GDP per Capita, and high human development index, Qatar continues to be an attractive destination for investment and serves as a testament to the country’s vision for a prosperous future.

### 5.3 The Qatar Financial Centre (QFC)

The Qatar Financial Centre (QFC), headquartered in Doha, was established by the Government of Qatar with the aim of attracting international financial institutions and companies to participate in the thriving financial services market in Qatar. The primary objective of the QFC is to position Qatar as a prominent financial hub in the region, attracting investment and fostering a vibrant environment for financial services in the Gulf and Middle East. Operating in alignment with international standards, the QFC provides businesses with a robust and legally sound infrastructure that adheres to global best practices. This ensures familiarity for companies already operating in other financial centres worldwide. To effectively carry out its operations and strategies, the QFC operates through two key entities: the Qatar Financial Centre Authority (QFCA) and the Qatar Financial Centre Regulatory Authority (QFCRA).

The Qatar Financial Centre Authority (QFCA) assumes responsibility for the administrative functions of the Centre. It focuses on securing administrative processes, formulating commercial strategies, and facilitating the growth and expansion of the Centre’s activities. The QFCA actively cultivates relationships with financial institutions both regionally and globally, attracting leading entities in the field of financial services to strengthen the Centre’s position.

On the other hand, the Qatar Financial Centre Regulatory Authority (QFCRA) was established to develop and oversee the systems associated with the organisation and operation of the QFC. As an independent agency owned and funded by the State of Qatar, the QFCRA operates under the purview of the Council of Ministers. Its mandate encompasses a range of crucial activities, including the regulation of financial services companies, the formulation of policies and laws, ensuring their proper implementation and compliance within the QFC, combating money laundering, and facilitating international cooperation with regulatory bodies and international organisations. Notably, the QFCRA places importance on safeguarding whistleblowers through the enactment of a robust whistleblowing policy (QFCRA, no date). The main departments involved in the whistleblowing process within the QFCRA are policy, enforcement, and supervision and authorisation. The subsequent subsections outline the scope of their work and their respective roles in implementing the whistleblowing framework. Figure 6 provides an illustration of the governance structure of the QFCRA.

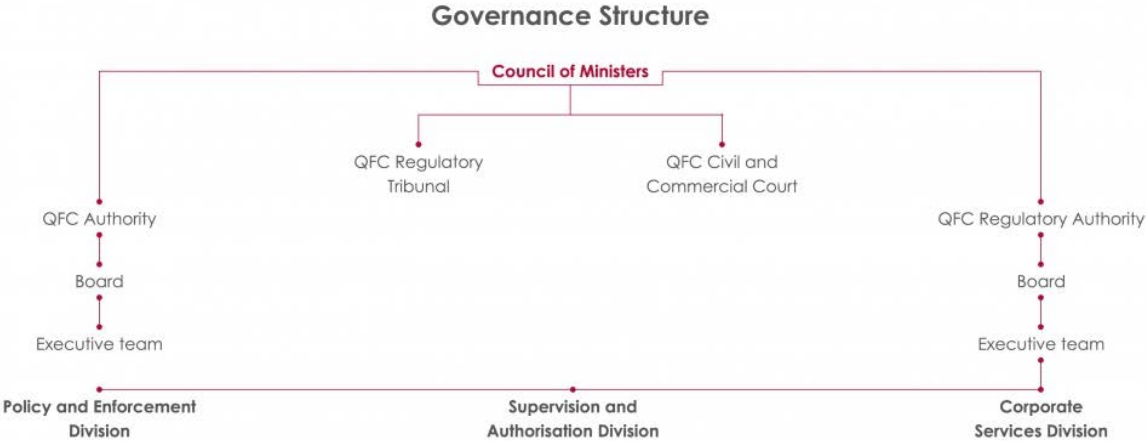


Figure 6: The governance structure of the QFCRA (Adopted by the QFCRA)

#### 5.3.1.1 The QFCRA – Policy Department

The Policy Department plays a vital role in the development and implementation of QFC’s regulatory framework. As part of the QFCRA’s mission to maintain the highest regulatory standards in the industry, the Policy Department actively collaborates with renowned standard-setting organisations<sup>38</sup> to ensure that regulations remain competitive on an international level. With a focus on regulatory and legislative perspectives, the department persistently analyses emerging trends, opportunities, initiatives, and risks to inform policy decisions (QFCRA, 2020e).

Working within a robust policy-making mechanism, the department formulates proposals that align with the QFCRA’s regulatory system. These proposals are designed to enhance the legislative and regulatory framework of the organisation. To ensure inclusivity and transparency, the Policy Department maintains regular engagement with market participants, particularly those approved by the QFC. Through consultation papers and town hall meetings, the department actively seeks public feedback, allowing for a collaborative and informed approach to policy development (QFCRA, 2020e).

In 2017, the Policy Department took a significant step by developing the whistleblowing framework, which was further refined in 2019 for enforcement by the Enforcement Department. This emphasises the department’s commitment to promoting accountability, transparency, and ethical practices within the QFC, thereby fostering a culture of integrity and trust (QFCRA, 2020e).

#### 5.3.1.2 The QFCRA – Enforcement Department

An effective regulatory regime necessitates a mechanism that empowers the Regulatory Authority to take decisive enforcement measures in response to violations of rules and regulations. In this regard, the Department of Enforcement assumes a vital role within the QFCRA, making significant contributions towards the organisation’s primary goals. Equipped with a range of powers, the department strategically employs its resources to proactively prevent, detect, and deter various forms of misconduct, including fraud, dishonesty, money laundering, market manipulation, insider trading, and other financial crimes that pose a threat to the credibility of the QFC (QFCRA, 2020c).

Under the purview of the Regulatory Authority, the ‘Protected Reporting’ whistleblowing framework operates in conjunction with the provision of support for the independent function of ‘Authorised Firms’. Furthermore, the Regulatory Authority mandates that all ‘Authorised Firms’ must establish their own ‘Protected Reporting’ whistleblowing policy. Within this framework, the Enforcement Department assumes responsibility for the recording, allocation, monitoring, and reporting of all whistleblowing reports received by the Regulatory Authority, in accordance with the General Rules (GENE) governing the ‘protected reporting’ framework. The establishment of this scheme dates back to 2017, with the ongoing management now entrusted to the capable Enforcement team (QFCRA, 2020c).

#### 5.3.1.3 The QFCRA – Supervision and Authorisation Division

The Supervision and Authorisation Division encompasses three key departments: Authorisation, Macro Prudential Analysis, and Supervision, which also includes Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) (QFCRA, 2020f).

The Authorisation team’s responsibility lies in granting approval exclusively to companies or individuals engaged in financial services within or originating from the QFC. Notably, this regulatory authority

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<sup>38</sup> For example: Basel Committee on Banking Supervision (BCBS), Financial Action Task Force (FATF), and International Association of Insurance Supervisors (IAIS).

oversees corporate banks, investment banks, investment management firms, advisory companies, insurance firms, and insurance intermediaries (QFCRA, 2020b).

To complement the traditional approach of company-specific monitoring, the Macro Prudential Analysis team employs horizontal or cross-company practices to monitor industrial practices in banks, insurance firms, and investment industries. This methodology facilitates the identification of common financing methods, preparation of financial position statements, evaluation of interconnections, and analysis of other variables influencing systemic risk. By providing early warnings and insights into emerging risks and macroeconomic factors impacting relevant financial sectors, this team assists individual companies in making informed decisions and taking timely action (QFCRA, 2020d).

The Supervision department adopts a risk-based supervisory strategy that encompasses ongoing monitoring, routine onsite and offsite risk assessments, and scrutiny of financial information. Guided by internationally recognised supervisory guidelines, this division ensures effective oversight and promotes the stability and integrity of financial operations (QFCRA, 2020g).

Operating as a dedicated entity, the QFCRA maintains a specialised framework for tracking financial crime risks, strengthening AML/CFT oversight within companies, and enforcing AML/CFT regulations. This framework plays a vital role in safeguarding the integrity of financial systems (QFCRA, 2020a). Figure 7 illustrates the regulatory authorities within Qatar’s regulatory framework, including the QFCRA, the Qatar Financial Markets Authority (QFMA), and the Qatar Central Bank (QCB) (QFCRA, 2020b).



Figure 7: Regulatory framework in Qatar (adopted by the QFCRA)

The Supervision department is responsible for overseeing whistleblowing cases exclusively involving authorised firms operating under the QFCRA in accordance with Law No. 5 of 2005.

### 5.4 Whistleblowing in Qatar

Whistleblowing presents a complex context with inherent challenges and contradictions. Despite the existence of whistleblowing policies and organisational encouragement for reporting misconduct, the evidence reveals a disturbing trend of management retaliation against whistleblowers, significantly undermining the effectiveness of these policies (Brennan, 2020). Moreover, the stark disparity between the establishment of whistleblowing policies and the adverse responses from management raises critical

questions regarding the practical functioning and efficacy of whistleblowing policies. The QFCRA's statistics reveal an upward trend in reported incidents from 2018 to 2020. Referrals increased from two in 2018 to six in 2019, and then doubled to ten in 2020. This rise in referrals corresponds to the growing presence of authorised firms, indicating a higher likelihood of encountering fraud or misconduct (for more details refer to 6.2.1 The matters of concern). It is necessary to dig deeper into these issues to understand the underlying dynamics and factors that impede or facilitate whistleblowing in order to inform the development of more robust and effective policies and practices in Qatar.

The QFCRA emphasises the importance of encouraging staff to report unlawful behaviour, outlining the need for clear codes of conduct and accessible whistleblower protection (QFCRA, 2012). Similar objectives are shared by the Royal Sun Alliance (RSA) Ireland's whistleblowing policy, which seeks to enable internal reporting of concerns and provide confidential channels (Brennan, 2020). However, these policies often remain ceremonial, as evident from Qatar's declining efforts to combat corruption according to Transparency International's Corruption Perception Index (CPI) (refer to Figure 8)<sup>39</sup>. This decline raises concerns about the future effectiveness of whistleblowing policies in fighting fraud. Qatar's ranking in reported fraud cases in the MENA region indicates hesitancy among accountants and auditors to act as whistleblowers (Association of Certified Fraud Examiners, 2018).

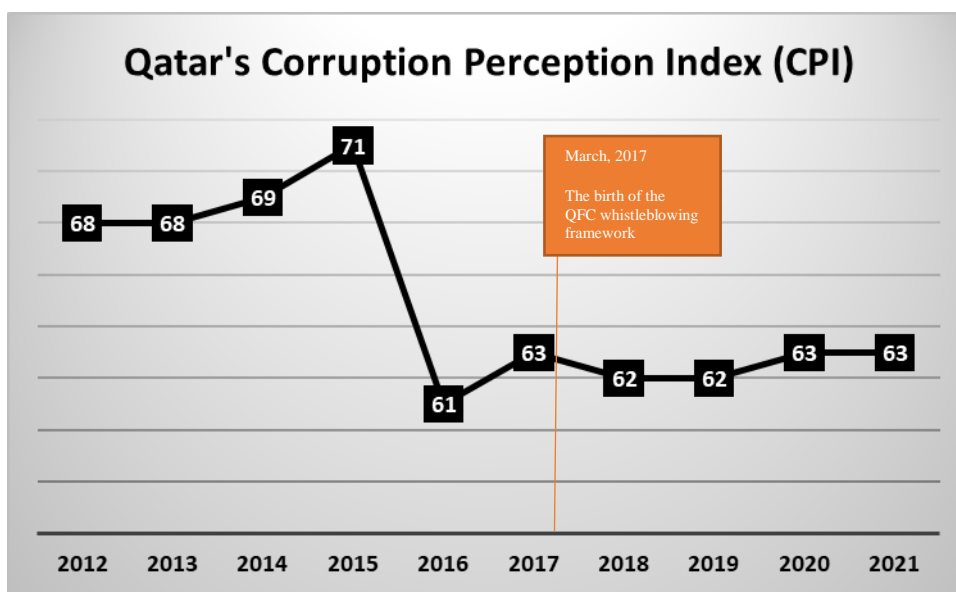


Figure 8: Qatar's Corruption Perception Index (CPI) adopted by the author

The literature on whistleblowing lacks critical perspectives on the performative nature of policies, often revealing contradictions between organisations' claims of integrity and their attitudes towards whistleblowing (Sikka, 2010; Brennan, 2020). To understand the effectiveness and trust associated with whistleblowing policies, it is essential to study the dynamic processes surrounding whistleblowing and the networks and structures that contribute to outcomes (Brown *et al.*, 2014; Mahama and Chua, 2016; Brennan, 2020)

Qatar's progress in corporate governance and adoption of QFCRA whistleblowing framework make it an timely setting for whistleblowing research (QFCRA-press release, 2017). The prevalence of fraud cases

<sup>39</sup> Qatar's Corruption Perception Index (CPI) has indicated a decline in combating corruption over the last years. Qatar's CPI scores (scale 0-100) over 2015–2021 were 71, 61, 63, 62, 62, 63, and 63 respectively (a 0 score indicates a high level of perceived corruption, while 100 suggests a low level of perceived corruption). The observation of declining Qatar's CPI raises concerns and uncertainty about the future performativity of the whistleblowing policy and its role in combating frauds. The whistleblowing policy emerged during this period. Its birth was November 2017; the QFCRA proposed a whistleblowing policy; this was drafted in April 2018 and became effective on 28 March 2019.

and the cultural context of high uncertainty avoidance<sup>40</sup> further highlight the need to explore whistleblowing in Qatar and evaluate the effectiveness of the whistleblowing framework within the QFCRA<sup>41</sup>. Conducting research involving experienced professionals facing ethical dilemmas in their organisations provides valuable insights into real-life whistleblowing dynamics. Understanding the whistleblowing context in Qatar can contribute to enhancing trust and creating a safe reporting environment.

## 5.5 Qatar's anti-fraud measures: strengthening integrity and trust

### 5.5.1 Arresting Qatar's finance minister over embezzlement allegations

In a significant development on the 6th of May 2021, Qatar made headlines as the country's finance minister, Ali Sherif Al-Emadi, was arrested on charges of corruption. The arrest followed allegations of abuse of power, misuse of public funds, and embezzlement. H.H Sheikh Tamim Bin Hamad Al-Thani, the country's leader, promptly removed Al-Emadi from his position (Kerr, 2021; Reuters, 2021). Al-Emadi, who held the role of finance minister since 2013, had also played prominent roles in Qatar National Bank (QNB) and Qatar Airways. His involvement extended to Qatar's powerful \$300 billion (£216 billion) sovereign wealth fund, the Qatar Investment Authority, where he sat on the board and owned 50% of Qatar National Bank. Furthermore, Al-Emadi had been involved in infrastructure projects associated with the 2022 World Cup hosted by Qatar (BBC News, 2021).

While such arrests are rare in Qatar, the nation has been actively combating corruption as it prepares to host the FIFA World Cup 2022, investing billions of dollars in stadiums and facilities. H.H Sheikh Tamim has been at the forefront of an anti-fraud and corruption campaign since assuming leadership ten years ago, stressing the importance of good governance, the rule of law, and combating corruption and injustice for successful development. He has made it clear that financial and administrative corruption, which can undermine institutions, will not be tolerated. Qatar's commitment to integrity and transparency has been consistently emphasised by its officials (Administrative Control and Transparency Authority, 2021).

An election is scheduled for October 2021 in Qatar, where the consultative assembly, the Shura Council, will be chosen. This election marks the first since H.H Sheikh Tamim assumed power (Cornwell and Barrington, 2020). Prior to his cabinet appointment, Al-Emadi had played a vital role in establishing Qatar National Bank as the region's largest lender during his nearly seven-year tenure as CEO. However, following his arrest on embezzlement charges, Al-Emadi was removed from QNB's board of directors. The Financial Times has reported allegations of bribery and improper commissions related to government contracts (Kerr, 2021). Qatar's Foreign Minister, Mohammed bin Abdulrahman Al-Thani, clarified that the investigation solely focuses on Al-Emadi's government work, with no allegations pertaining to his involvement in any other entities. He expressed confidence in the high levels of corporate governance within Qatar's companies, highlighting regular reviews and audits conducted to ensure governance standards are upheld (Reuters, 2021).

This incident raises concerns about the effectiveness of whistleblowing policies, as the country's top leadership maintains a strong stance against corruption and financial fraud. As a testament to their commitment, the Qatari ministries cabinet approved a draft law to combat conflicts of interest, subsequently

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<sup>40</sup> The dimension of uncertainty avoidance demonstrates "the degree to which the members of a society feel uncomfortable with uncertainty and ambiguity" (Hofstede Insights, 2021).

<sup>41</sup> Previous research on whistleblowing has focused on countries like Barbados (Alleyne et al., 2017; Alleyne, Hudaib and Haniffa, 2018), China (Zhang, Chiu and L. Wei, 2009; Zhang, Chiu and L.-Q. Wei, 2009; Liu, Liao and Wei, 2015), South Africa (Maroun and Gowar, 2013; Maroun and Atkins, 2014; Maroun and Solomon, 2014; Soni, Maroun and Padia, 2015a), Turkey (Nayir and Herzig, 2012; Erkmén, Çalışkan and Esen, 2014), New Zealand (Liyanarachchi and Newdick, 2009; Liyanarachchi and Adler, 2011), Indonesia (Latan et al., 2018; Latan, Ringle and Jabbour, 2018), Taiwan (Hwang et al., 2008a), South Korea (Park and Blenkinsopp, 2009), Ireland (Brennan and Kelly, 2007), Australia (Liyanarachchi and Adler, 2011; Cassematis and Wortley, 2013), Germany (Pittroff, 2014), the US (Reckers-Sauciuc and Lowe, 2010; Robinson et al., 2012; Taylor and Curtis, 2013; Andon et al., 2018), and countries across Europe (Hassink, De Vries and Bollen, 2007) were considered as the most common choice for such research settings in the past. However, research on Qatar still presents an empirical gap in relation to whistleblowing.

referring it to the Shura Council (QNA, 2021). These developments emphasise Qatar's ongoing efforts to strengthen integrity, transparency, and trust within its governance and financial sectors, reinforcing its commitment to combating corruption and ensuring accountability.

### 5.5.2 H.H Sheikh Tamim Bin Hamad Al-Thani International Anti-Corruption Excellence Award

The Highness Award serves as a global beacon in the fight against corruption, encouraging international efforts to combat this pervasive issue. The award, presented in four categories – Lifetime/Outstanding Achievement, Innovation, Youth Creativity and Interaction, Research and Academic Educational Materials – aligns with the United Nations' International Anti-Corruption Day on December 9th. Qatar's consistent sustainability of the award for seven consecutive years since its inception in 2016 reflects the nation's commitment to enhancing transparency and accountability on a global scale. By honouring exceptional contributions to the fight against corruption, the award emphasises Qatar's dedication to supporting activists combating this worldwide menace and igniting optimism for reform and change (Anti-Corruption Excellence Award, 2017).

Despite corruption's widespread grip on the world, this initiative aims to showcase exemplary actions and best practices in tackling corruption, raise awareness, foster solidarity, and inspire similar initiatives towards a corruption-free society (Rule Of Law and Anti-Corruption Center, 2019). Founded by the Center for the Rule of Law and Anti-Corruption, chaired by Dr Ali bin Fetais Al-Marri, the former Attorney General and United Nations Special Advocate for Combating Corruption, the award celebrates individuals and organisations that represent specific criteria and qualities in their anti-corruption endeavours (United Nations Institute for Training and Research, 2020).

Corruption, a multifaceted phenomenon affecting countries globally, undermines institutions, hampers economic progress, and contributes to government instability. Recognising the importance of addressing corruption, the United Nations adopted the United Nations Convention against Corruption in October 2003, designating the United Nations Office on Drugs and Crime as the secretariat for the Conference of the States Parties to the Convention. Moreover, the United Nations General Assembly designated December 9th as International Anti-Corruption Day to raise awareness about corruption and the Convention's role in combating and preventing it (United Nations Office on Drugs and Crime, 2004). This award plays a crucial role in fostering a global culture that recognises the indispensable link between sustainable development, the fight against corruption, and the consolidation of the rule of law.

## 5.6 Research context concluding remarks

The research context chapter has provided a compelling case for studying whistleblowing within the unique context of Qatar as an emerging economy and developing country. As a prominent player in the global market, Qatar's remarkable economic growth and abundance of natural resources emphasise its significance in the international arena. However, amidst this prosperity, the nation faces distinctive challenges in establishing robust governance frameworks and addressing issues related to fraud and misconduct.

The study of whistleblowing within this context is of utmost importance, offering a valuable opportunity to dig into the dynamics and complexities of reporting mechanisms in a rapidly evolving economic context. By examining the experiences of accountants, auditors, and professionals dealing with ethical dilemmas, this research contributes to the knowledge base on whistleblowing practices in developing countries. The findings have far-reaching potential, informing policymakers, regulators, and organisations both in Qatar and beyond, thus shaping more effective whistleblowing policies, enhancing transparency, and fostering a culture of accountability.

Qatar's commitment to integrity and trust is evident in its dedication to combating corruption and financial fraud. The recent arrest of the finance minister and the establishment of the H.H Sheikh Tamim Bin Hamad



Al-Thani International Anti-Corruption Excellence Award exemplify the nation's relentless efforts to strengthen its governance and financial sectors. However, despite the existence of whistleblowing policies, the evidence reveals concerning trends of management retaliation against whistleblowers, raising critical questions about policy effectiveness.

The research in this context holds remarkable promise. By digging into the dynamics and processes of whistleblowing, we can gain valuable insights into policy performance and trust-building routines, enabling the development of more robust and effective whistleblowing practices. Qatar's progress in corporate governance and its adoption of QFCRA whistleblowing framework make it a timely setting for this study, providing a deeper understanding of the cultural context and addressing reluctance to blow the whistle.

In essence, the study of whistleblowing in the context of developing countries like Qatar is a crucial undertaking, offering valuable lessons and perspectives for policymakers and stakeholders alike. It is an opportunity to promote a resilient and robust whistleblowing framework that can withstand the challenges and contradictions often associated with whistleblowing practices.

## 6 Empirical analysis

### 6.1 Overview

This chapter presents the findings derived from the analysis of data gathered from the semi-structured interviews, archival documents, and observations. The analysis chapter outlines the ‘matters of concern’ and the process of translation as per Callon’s three stages of translation (see section 3.4 Callon’s three stages of translation: matters of concern and continuous experimentation). The study investigates the creation and development of whistleblowing framework as an accountability mechanism within the QFCRA. Further, it portrays the evolving relationships that exist between trust and management control systems.

There were four themes that arose from this qualitative analysis: [1] Translating matters of concern into a ‘solution’, [2] Calculations: developing and evaluating a whistleblowing framework, [3] Framing the microcosm ‘the whistleblowing framework’, and [4] Navigating struggles in the wider context ‘macrocosm: the actual whistleblowing practice’. Each theme encompassed several subthemes and codes that support answering the research questions.

The first section, translating matters of concern into a ‘solution’, explained the reasons behind the emergence of the whistleblowing framework and started with identifying the matters of concern: [1] costly for QFC to keep two reporting channels in its both arms the QFCA and QFCRA, [2] chaotic situation with no policy in place, [3] costly for SMEs under the QFC authority to develop policies, [4] Qatar witnessed fast growing in number of authorised firms which associated with increase in frauds, and [5] pressure to enhance the trust outlook for attracting foreign investments to Qatar. These matters of concern triggered future uncertainty and suggested to do the process of identification of fraud reporting. These were not the factual problems, but they were ‘claims’ matters of concern that collectively defined the problem. At that point, the problem had been identified as: costly, wasteful, and inefficient. Then, the consultation team proceeded to define the identity of the QFC as well as the general business interests that the QFC serves to bring about the solution. The connections drawn between the costs of handling fraud cases and other themes: the function was neither a strategical differentiator, nor a core competency, and it was inefficient. The solution was a bright future with a delegated whistleblowing framework promised efficiency, key personnel in the QFC unchained to concentrate on their core competencies, and a collaborative world of integrated whistleblowing actors at all levels of the process.

The second section, calculations: developing and evaluating a whistleblowing framework, explained how the whistleblowing framework emerged. The development method was: [1] doing activities to identify trustworthy whistleblowing framework that yield value, and [2] assessing framework statements as standard procedure. This theme portrays the process of ‘crafting’ whistleblowing framework that participants in this study reported. Participants shared the culture at their companies around whistleblowing framework. They also identified the goals they believed motivated the whistleblowing framework, and the calculative methodologies used to function as an accountability mechanism. It showed how the QFC attempted to develop a trustworthy whistleblowing framework as well as value-generating statements.

The third section, framing the microcosm ‘the whistleblowing framework’, it showed how the ‘frame’ objectified the whistleblowing framework and assisted in making it ‘real’ by providing it with legal standing, identifying selected actors, and dispersing agencies among them all. This section demonstrated the endeavours of the QFC consultants to create the strategies for the interface amid the whistleblowing actors (e.g., the QFC departments, the authorised firms, etc.). A model of how the whistleblowing framework would practice-as-strategy represents the concept underlying the framework document had been developed: the establishment of predictable behaviour, mutual value sharing, and information exchange as the basis of a ‘philosophy’. Criteria were created through a ‘hypothetical scenarios’ and defined the capacity to monitor, supervise and control the development of policies and procedures by the authorised firms. The

whistleblowing framework in its fixed form would assist in reducing uncertainty. It constrains the whistleblowing procedures options open to the authorised firms. Reporting information would be exchanged, and system interfaces would allow the QFC to have quick and stress-free access to the reporting information of all the authorised firms. For the QFC, building trust had to be based on clear and reciprocally common expectations regarding various responsibilities for satisfying the narrated criteria in the framework. Sharing information between QFC and its authorised firms on fraud reporting and monitoring was perceived as a foundation for building trust. This was a component of the concept underlying the framework document: 'the philosophy'. For the QFC-authorised firms, their readiness to release their whistleblowing reports not only exposed them to possible 'control' by the QFC management, but it also signalled their commitment to be 'transparent' and 'accountable'. In turn, this signalled that QFC-authorised firms trusted that the QFC management would utilise the information in a 'sensible' way. Therefore, the analysis aligns with the notion that management control systems could be a foundation for trust.

The fourth and final section, navigating struggles in the wider context 'macrocosm: the actual whistleblowing practice', highlighted the issue of diverse 'trust trials'. When the model was implemented, management control systems materialised the magnitude of violated commitments that the framework promised to deliver, and the whistleblowing framework assumed a new identity as a symbolic instrument. The relationships in the fieldwork did not manufacture readily as shown previously in the theorised micro world. In other words, the new macro-world did not reflect the hypothesised model in the micro-world of the QFC consultants and administrators. The major issue focused on the struggles in the macrocosm 'the actual whistleblowing practice', which uncovered participants' descriptions of the process of whistleblowing reporting. This included information about the investigation process that occurs with a whistleblowing report. The struggles in the macrocosm were composed of new matters of concern both technical and cultural. The technical matters of concern were [1] unguaranteed protection in anonymous reporting and [2] incredible investigation of anonymous reports. Another matter of concern that arose from this analysis was calculating and making the whistleblowing, which was composed of participants detailing the aims of whistleblowing policies and the culture around these whistleblowing policies. This included [1] resistance of hiring whistleblowers, [2] the lack of awareness about the whistleblowing framework, [3] and the absence of clarity in the policy statements which was recognised and discussed by the associates of QFC-authorised firms.

The whistleblowing framework in the QFC was fortified as an accountability mechanism since its birth, calculation, and framing. The final relationship, however, struggled due to issues of complexity and uncertainty that emerged right from the time the whistleblowing framework was issued. The QFC spent a significant amount of money and resources in developing a trustworthy whistleblowing framework and in ensuring that the anticipated duties and responsibilities were well understood. This significant up-front investment appears to have contributed significantly to subsequent feelings of deep disappointment when it was seen that QFC-authorised firms and the framework practice had breached their commitments. As a result, the method in which a whistleblowing framework is established has an impact on its future trajectory – history is important. The issue of 'distrust' and feelings of dissatisfaction primarily contributed to repair work aimed at restoring the whistleblowing framework.

## 6.2 Translating matters of concern into a ‘solution’

The analysis foundation for whistleblowing, viewed through the lens of Actor-Network Theory, entails a shift from ‘matters of fact’ to ‘matters of concern’ (Latour, 2004). Matters of fact refer to general statements about the nature of phenomena, while matters of concern dig into ongoing inquiries that are never fully resolved. In essence, matters of concern continuously explore and consider phenomena as unsettled, revealing their origin within complex and diverse networks. Both matters of fact and concerns emerge from heterogeneous networks, yet matters of concern highlight the intermediated and processual nature of reality, focusing on constructing relationships that may ultimately lead to the emergence of actors with agency. By regarding whistleblowing as a matter of concern, we continuously question and challenge its nature and function, emphasising the multitude of relationships that mediate and influence whistleblowing in specific and contextual ways.

Callon (2009) emphasises the significance of incorporating matters of concern when analysing the ordered form of a phenomenon. By doing so, we can adopt procedures and devices that not only encourage the expression of arising problems but also facilitate the design and evaluation of theoretical or practical solutions to address those challenges.

### 6.2.1 The matters of concern

During the fieldwork, several unconnected instances came to light, raising significant concerns about the management of fraud and wrongdoing cases, and opening the way for the implementation of a delegated ‘Whistleblowing Framework’ as a viable solution.

One of the primary concerns identified was the lack of complementarity in the collaboration between the QFC Authority and the QFC Regulatory Authority. This led to both entities independently dealing with and managing fraud and wrongdoing cases, resulting in the existence of two separate channels for reporting such incidents within the QFC. Consequently, the costs associated with maintaining these dual channels became a cause of concern for the QFC management, who deemed them unacceptable.

*We do this by way of regular normal quarterly submissions, we get formal notifications of any complaints. whistleblowing is could also be complex, but also the requirement that if there is any report, then it has to be communicated to us within five days of reporting, not after you have investigated and decided the threshold where they should be referred to the regulator or anything that is reported (The director of prudential supervision (QFCRA Supervision Department))*

He implies the collaboration between the two entities in processing and managing fraud and wrongdoing cases. The costs associated with this process include the time and resources dedicated to regular quarterly submissions, formal notifications of complaints, and communication within five days of reporting. The QFC Regulatory Authority ensures that firms have communicated the whistleblowing process to their employees. This represents another cost, in terms of time and resources allocated for regular visits and discussions with senior management. The Associate Director, Investment Manager, Advisor and Securities Supervision mentions:

*When we do our regular visits with them as when we have discussion with the senior management, we need to make sure that the whistleblowing within the firm has been communicated to, to the employees or the staff*

Similarly, The Associate Director (QFCRA Enforcement Department), noted:

*have to go back to the, like the supervisor, need to liaise this, highlight this point during their rough visit. And they will talk to you about this. Yes. Yeah. So it's like, and we are waiting their their feedback. So it sometimes takes like a couple of months to finalise it*

The process of liaising with supervisors and awaiting feedback can be time-consuming, implying a cost in terms of time and resources spent on each case. “So, and I would not quality control... I have to rely upon the specialists in these areas to be able to do their job properly” (The director of the enforcement department (QFCRA Enforcement Department)). This implies a cost in terms of relying on specialists in different areas to properly handle cases and ensure that they are dealt with correctly. Also, The Associate Director of Anti-Money Laundering and Combating Financial Crime highlights that the QFC Regulatory Authority receives information from the enforcement department and engages with firms to gather and analyse information. The costs involved here include resources for information gathering, analysis, and engagement with the firms:

*When we receive information generally from the enforcement department who run the whistleblowing scheme, we're given certain information and as supervisors we we do what we do as supervisors we we we engage with the firm, we gather information, we analyse that information.*

Following from the above, the QFCRA management recognises the significance of a robust whistleblowing mechanism; however, they express concern over the associated costs and resources required to maintain its efficacy. The investment in time, resources, and personnel for facilitating regular submissions, notifications, communication, visits, discussions, information gathering, analysis, and engagement with firms is substantial, and the QFCRA acknowledges these costs as a matter of concern in ensuring the effectiveness of the protected reporting process for addressing fraud and wrongdoing cases. The QFC “started looking at this as a policy initiative ... the regional examples, and ... international examples” The director of the Policy department (QFCRA Policy Department). Cost of maintaining two channels for receiving fraud and wrongdoing cases: Having both the QFC Authority and the QFC Regulatory Authority as channels for receiving fraud and wrongdoing cases could lead to duplication of efforts, resources, and costs.

Second, there was no policy in place to protect whistleblowers. Without a policy in place, “the organisation will be chaotic” (The Compliance Officer in a QFC-authorized bank), because fraud witnesses will have no idea who to contact, how to report their concerns, whether they will be protected or not, and what the end result of the reporting will be.

*we didn't have a whistleblowing protective reporting framework before. And then we took a board of directors decision to develop a framework... there would be would have been instances in the past where, you know, individuals may have come across information or been aware of activity that they, they wanted to report, maybe they addressed it to the institutions. And I'm not aware of any specific reports coming into the regulator. But again, supervision or enforcement maybe may have prior knowledge of previous cases. But of course, they wouldn't necessarily fit any legislative definition, because we wouldn't have had the rules in place then. (Director of the Policy Department, QFCRA)*

Third, developing policies is costly for companies. Companies do not create a policy unless it is a binding order from the regulator. Many of the companies operating under the QFC umbrella did not have a whistleblowing policy in place. “The companies might be a small, medium, and big size companies under QFC” (Partner in a Big-4 audit firm under the QFC). Few QFC-authorized firms did have a whistleblowing policy, while many others did not. An Assistant Manager of Internal Audit in a Big-4 (QFC-authorized firm) detailed the different reasons in a continuum between Small-Medium Enterprises (SMEs), governmental and Non-Profit Organisations (NGOs), and public firms in having a whistleblowing policy

in place. Figure 9 illustrates the continuum. He, further, highlighted the stance of the QFC-authorized firms and the rationale behind that:

*QFC request has officially made this requirement in 2017. Well, definitely, because QFC wants to, they want to make sure that the companies that are registered under underneath it are transparent companies that support that have you know, a mature level of controls, to make sure you know that the companies that are registered under it are aligned with leading practices that are aligned with the local laws and regulations, such as Qatar Financial Markets Authority rules or such as the Minister of commerce rules. So, you know, based on leading practices, they considered this particular procedure is very important to be at least.*

“The Regulatory Authority recognises that some QFC firms may already have protected reporting arrangements in place as a matter of good practice, although implementation may differ among firms. The introduction of protected reporting requirements for all Authorized Firms will result in a consistent framework that is in line with best practice principles” (QFCRA-Consultation Papers, 2017).

Some of the QFC-authorized firms that had a whistleblowing policy in place prior to the QFCRA mandating it, “they have higher budgets for the spending to improve the practice. So, these high budgets can entail better practice. Improved practices by spending more on opportunities that can improve the control environment that improve the control activities” (Assistant Manager of Internal Audit, big-4 QFC-authorized firm).

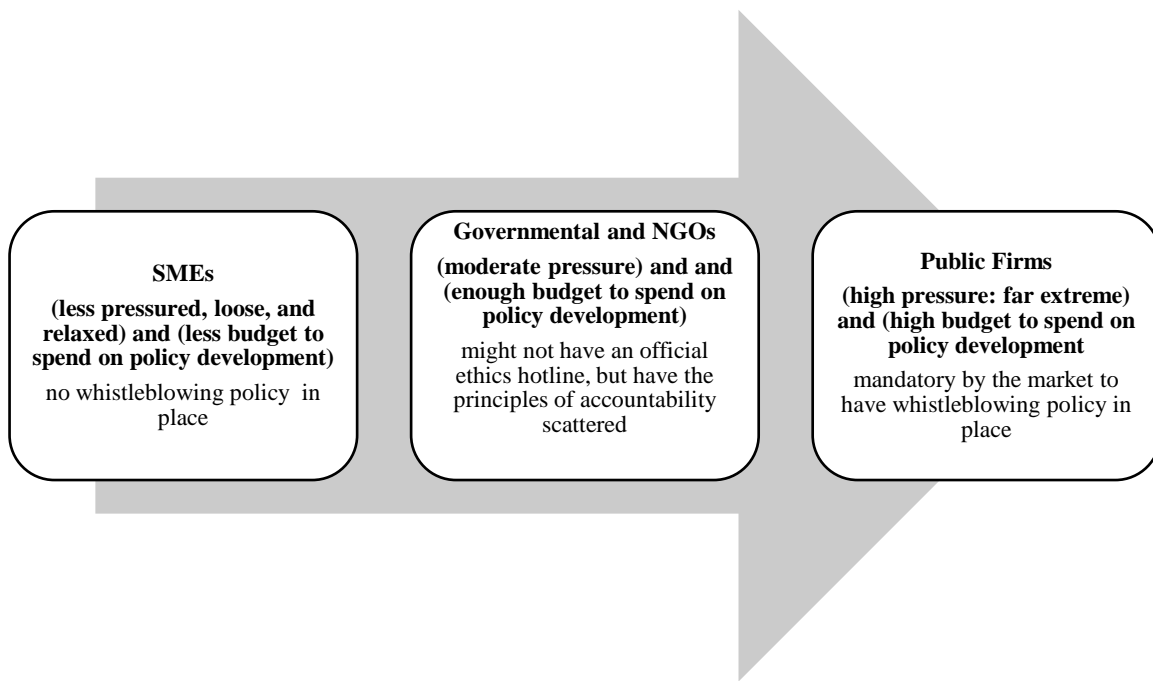


Figure 9: The continuum between the extremes of having whistleblowing policy in place

Although many other QFC-authorized firms did not have a whistleblowing policy, the notion of whistleblowing was not something new in the banking field. The banks are highly regulated because they are subject to higher risks than other sectors. The elements of whistleblowing were scattered amid different approaches. There was no formal or appropriate procedure for whistleblowing till the QFC mandated all

the authorised firms to develop their own whistleblowing policies. The Human Resources Manager in a QFC-authorised bank noted:

*... the idea of whistleblowing is not something new, at least in our in our in my practice in my field in the banking field. Apart from the whistleblowing policies, we have a fraud policy. We have a code of conduct and ethics policy. We have human resources and staff Handbook, manuals and policies. So for me, the topic of whistleblowing was not a new topic. It was a topic that was mentioned in several different places. So whether you are reporting a certain wrongdoings or a legal contract relating to fraud, or to the Code of Conduct or ethics such as discrimination, or, you know, harassment or other things, so there were bits and pieces about whistleblowing everywhere. And I believe that when the Qatar Financial Centre mandated that we have a whistleblowing, it was definitely a good call, because whistleblowing is a very important thing to have as a separate policy as a separate document.*

A Manager of Internal Audit in one of the Big-4 audit firms (authorised by the QFC), also noted:

*... There's not a formal or the right method of whistleblowing, but it happens like if there is anybody who has complaints issues, they might directly reach out to the HR and report it.*

The QFC recognises the varied dimensions of companies operating within its boundaries. Understanding the implications of company size is essential, as it can significantly influence the dynamics and organisational structures in place. For instance, smaller companies may foster informal communication channels and exhibit less rigid hierarchies, while their larger counterparts may have complex organisational structures and establish formal reporting systems.

This awareness of diversity highlights the importance of adopting a standardised approach to confront potential challenges that may emerge from these disparities. By addressing these concerns with an efficient and well-considered strategy, the QFC can ensure that all companies, regardless of their size, can thrive and contribute to the collective success of the business environment.

Fourth, the QFC was experiencing a fast-growing number of authorised firms registered under its authority, which could be associated with growing fraud/wrongdoing incidents. Not to mention that the QFC did not officially have a written whistleblowing policy and reporting mechanism framework at that time. The associated costs of controlling the case reporting became another concern to the QFC. The director of the Policy department (QFCRA Policy Department) highlights the various scenarios in which an employee of an authorised firm might become aware of wrongdoing. The diverse nature of these scenarios points to the concern that as the number of authorised firms grows, the likelihood of encountering instances of fraud or misconduct also increases. This necessitates the existence of a comprehensive reporting framework that can accommodate the varying nature of incidents employees may encounter. The director of the policy department at the QFCRA elucidated:

*... I'm not aware of, because I don't work in supervision. But, you know, I would imagine that there would be would have been instances in the past where, you know, individuals may have come across information or been aware of activity that they, they wanted to report, maybe they addressed it to the institutions. And I'm not aware of any specific reports coming into the regulator*

The potential for past instances of fraud and wrongdoing that may have gone unreported or addressed through unofficial channels. This emphasises the importance of implementing a formal whistleblowing framework to better handle such incidents, particularly in light of the increasing number of authorised firms under the QFC's purview. On a similar note, an Assistant Manager of Internal Audit in one of the Big-4 audit firms (operating under QFC) stated:

*it can be that, you know, because of the increased of may because of the influx of companies that have, you know, decided to operate in Qatar. You know, in a short time span, maybe from 2012 or 2013 to 2017. They're inside, okay, now, a lot of companies are operating, we have an increased volume of registrations, okay. Anything that grows too big, needs to be checked. For sure. And one of the ways to make sure it's checked is by you know, implementing or introducing new rules and regulations for these operating entities.*

He further suggested that the QFC has updated its rules and regulations in response to a trigger event. This update implies a reaction to the growth in authorised firms and the potential risks associated with that growth, such as ethical violations or breaches:

*I can't say that it's too late. Because it's, you know, at the end of the day, it's I mean, the moment an actual corrective action has been taken policy. We don't look at the history of the problem unless we want to learn the lesson. But definitely, definitely. QFC was I mean, these updates in the rules book regulations or rules have happened because of the trigger event. You know, there were some standards when it came to ethical violations or ethical breaches. And QFC was asking, you know, maybe QFC they have their own. I'm not aware enough what happened, the event that triggered this regulation or this rule, but something must have happened.*

The Associate Director (QFCRA Enforcement Department)'s analysis of the provided table (see Table 5: Whistleblowing (“WB”) - Key Statistics) demonstrates an upward trend in reported incidents from 2018 to 2020. According to the statistics, referrals increased from two cases in 2018 to six in 2019, and then doubled to ten in 2020. This escalating number of referrals corresponds to a rise in the number of authorised firms, implying a greater probability of encountering fraud or other forms of misconduct.

Table 5: Whistleblowing (“WB”) - Key Statistics			
Stage in WB Process	1 Jan – 31 December 2018	1 Jan – 31 December 2019	1 Jan – 31 December 2020
Enquiries to WB (whether in or outside jurisdiction)	2	6	10*
Out of scope matters	1	0	3
WB matters under assessment	0	0	4^
WB matters closed	1	6	3
* includes two matters carried over from 2019 ^ includes one matter carried over from 2019			

This observed trend emphasises the importance of proactive measures and continuous vigilance by the QFC to identify and address potential problems before they become more severe. In response to this growing issue, the QFC should consider implementing enhanced monitoring systems, educational initiatives, and stricter enforcement policies to mitigate the risk of fraud and maintain the integrity of its regulatory framework.

Fifth, at the same time, Qatar is diversifying its economic sources of income by transforming to an economy based on non-hydrocarbon sources. This relieves pressure on the hydrocarbon sector and opens up new revenue streams. The non-hydrocarbon sector has expanded rapidly, with a greater emphasis on



manufacturing, construction, and finance (Shawtari *et al.*, 2023). The QFC aims to make Doha a global financial capital. Therefore, the QFC made a strategic plans<sup>42</sup> for attracting more than 1,000 new foreign direct investments (FDIs) value 25 billion USD by the end of 2022 (Graham and Murphy, 2021). The strategies have 5 main strategic objectives as follows: improve financial sector regulation and promote regulatory cooperation; develop financial markets and foster innovation in the financial sector; maintain the integrity and trust in the financial system; promote financial inclusion; and develop human capital. The QFC is constantly looking for ways to improve and ensure that they are addressing the concerns of their stakeholders; they must ensure that their stakeholders are satisfied. One way to accomplish this is through the establishment of an ethical hotline or whistleblowing procedure.

*a lot of corporates are introducing to make sure they are, you know, they are satisfying the stakeholders, mostly their stakeholder satisfaction is in place. So, it is, you know, again, it's one of the another way I look at it is you know, how how much they're satisfying, you know, stakeholder needs the stakeholders desires, how are the voice addressed are the concerns addressed, again through whistleblowing. So I look at it as something, you know, that's becoming a lead part of the leading practices. (Assistant Manager of Internal Audit, big-4 QFC-authorized firm)*

The QFC was under a massive pressure to enhance its trust outlook. The QFC needs to establish an excellent commercial, legal, and regulatory environment. Such enhancements in ethics standards are needed to enable investors' trust. As a third line of defence, the QFC strives to gain investors' trust by improving governance and accountability within authorised firms through ethics to suppress frauds and wrongdoings. It was said that these ethical hotlines are meant to reduce the regulation, reputational, and legal risks therefore gaining investor's trust. Whereas not gaining investors trust could be costly. Within the QFC, the process of managing fraud/wrongdoing cases was one of the target areas for review.

*... Well, it goes back to our regulatory objectives, you know, that we are trying to ensure that the, the financial sector and the regulatory financial sector is safe and secure (The director of the Policy department (QFCRA Policy Department))*

The above highlights the importance of whistleblowing in the financial sector, focusing on the need for a robust framework to protect and support whistleblowers. In this context, the QFC may have been under pressure to enhance its trust outlook by introducing a whistleblowing framework to strengthen the overall stability and integrity of the financial system. The financial sector relies heavily on the trust and confidence of its customers, investors, and stakeholders. Maintaining a positive reputation is essential for any financial centre, including the QFC. By introducing a whistleblowing framework, the QFC demonstrates its commitment to transparency, accountability, and ethical practices within the financial sector. This proactive approach can enhance the trust outlook and foster a more positive perception of the QFC among various stakeholders.

*Companies that are under Qatar Financial Centre... they have less than burden when it comes to regulatory requirements... They have put this in place, you know, the whistleblowing... QFC and QFMA... they would look at... what kind of gaps or risks might be from the operations of these companies? It's mostly to show... that QFC companies are aligned with leading practices in this field and to minimise any risks of regulation... QFC is responsible to regulate these companies... it is the oversight body over these organisations... (Assistant Manager of Internal Audit, big-4 QFC-authorized firm)*

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<sup>42</sup> First plan was "Strategic Plan for Financial Sector Regulation between 2013-2016", while the second one was "Strategic Plan for Financial Sector Regulation - 2017-2022" (QFCRA, 2021).

Companies registered under the QFC benefit from a reduced regulatory burden in comparison to those operating outside the QFC. This is done to encourage private investment and promote business growth in Qatar. However, the challenge lies in maintaining a balance between ease of doing business and ensuring adherence to regulations and ethical standards. Implementing a whistleblowing policy is one way that the QFC can ensure a minimum level of control and governance. Encouraging employees to report unethical or illegal practices can help in identifying and mitigating potential risks and reinforcing corporate governance. Both the QFC and the Qatar Financial Markets Authority (QFMA) share a common goal of identifying and addressing potential risks arising from the operations of companies under their jurisdiction. They do this by implementing market listing rules, commercial laws, and regulations. The QFC aims to demonstrate that companies operating within its framework adhere to leading practices and maintain high standards of corporate governance. This helps to minimise potential risks associated with regulation, reputation, and legal liabilities. As the regulator and oversight body, the QFC must remain vigilant in its efforts to uphold its reputation and credibility. An Assistant Manager of Internal Audit, big-4 QFC-authorized firm elucidated:

*And if these firms or organisations are accused with ethical with ethical violations or they're contracted with ethical violations, QFC will be under scrutiny for sure by the public. The first question that will come to their mind is, where's QFC? Why didn't they address this earlier on? How? Why didn't they mandate these requirements in the QFC rules book or QFC handbook? Why did they just wake up?*

If the QFC and the companies under its jurisdiction do not implement a whistleblowing policy, it could lead to a loss of investor trust in the Qatar market. Investors may view the lack of a whistleblowing policy as an indication that the companies under the QFC are not fully committed to ethical standards and compliance with regulations. This could make investors hesitant to invest in these companies, which could ultimately impact the overall reputation and credibility of the Qatar market.

The financial burden associated with addressing instances of fraud and misconduct has emerged as a significant issue, as the present lack of a systematic approach is unable to offer satisfactory resolutions. This deficiency in a designated framework has given rise to uncertainty regarding the future management of fraud and misconduct cases within the QFC-authorized firms. Consequently, this uncertainty amplifies concerns about the long-term effectiveness of tackling these issues. "To remove uncertainty and bring about this common world in which those suffering from myopathy would find their place in a collective they have composed with others, the only solution is to embark on the exploration of possible worlds, to work at the coalface of investigation where, after having identified and formulated the problems"(Callon, Lascoumes and Barthe, 2009, p. 141).

Uncertainty is inherently linked to the processes of identifying and investigating instances of fraud and misconduct. In response to the QFC's concerns regarding the financial implications of managing such cases, a comprehensive identification and investigation procedure has been introduced. This streamlined approach aims to mitigate the potential risks associated with these cases, such as the expenses incurred due to gaps in internal controls and governance. By implementing this process, the QFC seeks to enhance the efficiency of fraud and misconduct management and establish a more robust system for addressing these concerns. In manifesting an aspiration for a review of the function of handling fraud and wrongdoing cases, the director of the policy department noted:

*In 2017, the Regulatory Authority was briefed by the Audit and Remuneration Committee to develop a whistleblowing framework for both the employees of the Regulatory Authority and employees of Authorised firms. Following internal review and discussion at senior management and Board level, the QFCRA decided to develop and approve a formal policy on whistleblowing for its authorised firms. The rationale for developing the policy was based on the belief that the introduction of such*

*requirements for authorised firms would assist both authorised firms and the Regulatory Authority in the early identification of risks and potential wrongdoing. In the same year, the Regulatory Authority drafted rules to develop and approve a formal policy on whistleblowing for its Authorised Firms.*

To better understand and tackle the challenges associated with managing fraud cases, a comprehensive work improvement initiative was launched, focusing on identifying the key drivers and the desired performance outcomes. The QFC sought inspiration from “international best practice, regional best practice, if that is evident”, and “publicly consult”, according to the policy director at the QFCRA. They actively solicited feedback from the market to shape their framework effectively. A specialised consulting team was assembled by the QFC to participate in and support the review process for handling fraud cases. This team required experts proficient in process analysis and control to identify and address the underlying issues. To ensure an in-depth evaluation, the consultation paper was distributed to experts across all QFC departments, enabling the team to examine the existing processes and develop appropriate solutions to the problem at hand. The director of the policy department, noted:

*In October 2017, the QFCRA released a consultation paper containing proposals to introduce protected reporting rules for QFC authorised firms. The consultation closed in January 2018 and the QFCRA then went through the process of analysing the consultation responses and making any appropriate changes to the draft rules. The new rules came into force on 1 May 2018.*

The analysis comprehensively detailed a method for discerning three critical aspects: firstly, the identification of the function responsible for managing fraud cases; secondly, the essence of the QFC’s primary operations; and finally, the connection between the QFC’s central business activities and the task of addressing fraud cases. This comprehensive approach was employed to facilitate a comprehensive understanding of the integral components and their interrelationships, thereby promoting the effectiveness and efficiency of the organisation’s fraud management processes. See Figure 10: The dynamics of macro world in the QFC (translation 1).

## 6.2.2 The identification of the function responsible for managing fraud cases

The process of managing fraud cases was developed through an analysis utilising an analytical tool called the consultation paper (QFCRA CP No. 2017/03) titled “Proposed Protected Reporting (Whistleblowing) Amendments Rules” (QFCRA-Consultation Papers, 2017) (refer Appendix 9 to for the consultation paper and Appendix 12 for the policy draft). This consultation paper effectively functioned as a central hub for calculations and analysis, offering a refined portrayal of the system designed to address cases of fraud and wrongdoing.

To develop a comprehensive understanding, the QFCRA gathered data from a variety of sources, including academic literature reviews, international regulatory requirements, and best practice guidelines for whistleblowing frameworks. Notably, the whistleblowing framework has focused on several reports and best practice guidelines issued by both the Group of Twenty (G20) and the Organisation for Economic Co-operation and Development (OECD).

For best practice guidance, the QFCRA also considered the protected reporting frameworks of the Financial Conduct Authority (FCA) in the United Kingdom, the Office of the Superintendent of Financial Institutions (OSFI) in Canada, the Australian Prudential Regulation Authority (APRA) and the European Union as benchmark jurisdictions.

Upon compiling the data, it was incorporated into the General (Protected Reporting) Amendments Rules 2017 (QFCRA-press release, 2017), ensuring a robust and well-informed approach to addressing fraud and fostering an environment of transparency and accountability.

In a comprehensive analysis through the process of identification, three crucial components have been discerned in managing cases of fraud and wrongdoing. Firstly, clear definitions for both a protected report and a protected reporter must be established. Secondly, the identification of specific requirements necessary for the creation of a robust protected reporting policy is essential. Lastly, the effective implementation of this policy must be ensured.

Prior to this examination, these vital elements had been fogged within the functions of both the QFC divisions: the QFCA and the QFCRA. The findings are further detailed in Table 6: The QFC’s handling fraud/wrongdoing function elements. The consultation team’s expert insights have enabled greater transparency, providing visibility to these critical policy aspects, aiming to achieve consistency in the handling and administration of fraud and wrongdoing cases. By doing so, a reliable framework that serves to protect those who come forward with crucial information can be created.

Table 6: The QFC’s handling fraud/wrongdoing function elements		
Definitions	Requirements	Implementation
- Not given!	<ul style="list-style-type: none"> <li>- Approval by the firm’s governing body.</li> <li>- Communication to all staff.</li> <li>- Offering protections (e.g., anonymity, confidentiality and measures against retaliation).</li> <li>- Recognition the right of the protected reporter to communicate with the QFCRA.</li> <li>- Providing for the acknowledgment, assessment, investigation, escalation and conclusion of the protected reporting process.</li> <li>- Providing for the outcomes of those processes to be communicated to the protected reporter.</li> </ul>	<ul style="list-style-type: none"> <li>- Nomination a senior individual to oversee the implementation of the policy.</li> <li>- Notification the Regulatory Authority of protected reports received by the Authorised Firm.</li> <li>- Review the policy at least every three years.</li> <li>- Regularly train staff on the policy and applicable procedures.</li> <li>- Appropriately deal with any outsourced elements of the policy.</li> </ul>

Through utilising the consultative approach, previously disconnected and dispersed elements have been consolidated, made compatible, and presented within a shared analytical and visual framework. This process has generated a comprehensive representation of the management of fraud and wrongdoing cases, which is easily comprehensible by all. Moreover, the general concerns about managing fraud and wrongdoing expenses have been refined and mobilised into three distinct challenges: (1) inefficiencies in processing fraud and wrongdoing reports, (2) excessive costs linked to the functioning of the management system, and (3) insufficient protection for whistleblowers.

These particular challenges highlight the adverse consequences of the existing system’s shortcomings, specifically in terms of offering the necessary protection and efficacy in addressing misconduct reports within QFC-authorized firms. The improvements sought aim to establish a more robust, efficient, and secure framework for managing fraud and wrongdoing cases, ultimately benefiting all stakeholders involved.

In a nutshell, the primary issue with the existing ad-hoc function responsible for managing fraud and wrongdoing was found to be its costliness, wastefulness, and inefficiency. Once the problem was identified, the consultation team sought a solution by defining the QFC's identity and its primary business interests. The core business of the QFC, which serves the interests of its authorised firms, was deemed the most crucial aspect.

### 6.2.3 The essence of the QFC's primary operations

In order to provide substantial benefits to the QFC's authorised firms, the concept of core business and its related core competencies were comprehensively discussed within the business context, while concurrently reviewing the function that handles fraud and wrongdoing cases (Quinn and Hilmer, 1994). The QFC recognised that they are "not a specialist in all those areas" (The director of the enforcement department). To mitigate unspecified risks, the consultation team focused on evaluating the position of the function responsible for managing fraud and wrongdoing cases within the QFC's core business framework. The director of the policy department at the QFCRA elucidated:

*... within the regulatory authority, we have lots of different functions, but policy is the one I've just described, we were responsible for developing the rules, then once the rules have been made and implemented, then our supervisors, they have an ongoing relationship with our firms, they supervise them, make sure they're in compliance with the rules. So on a on an ongoing basis, they have to check that the banks the insurance and the asset management firms are implementing whistleblowing framework and whistleblowing rules. And they routinely go in and check supervise compliance by those authorised firms. Okay, the bank will go in look at the banks talk to the banks about how they design their whistleblowing framework, how they've been looking at any risks arising out of whistleblowing. So that's what the supervisors do. And then the enforcement function, as I described before, their their primary responsibility in terms of whistleblowing is to receive or be another channel for whistleblowers to receive whistleblowers report.*

The consultation team precisely analysed and restructured the underlying causal relationships, which were not initially apparent or obvious, concerning the positioning of the function responsible for managing fraud and wrongdoing cases within the QFC business context. The director of prudential supervision at the QFCRA asserted:

*... the work of a regulator in essence, is always to review and assess an institution's compliance risk and control frameworks... we come in as the third line of the fourth line of defence. So things happen every day, institutions, they have boards and governing bodies, senior management, and all employees are the ones that are responsible for ensuring that they conduct the operations in an environment that is well managed, that complies with the rules, regulations, and contracts ...not all elements of non-compliance indicators or should be treated as whistleblowing... the responsibility of regulator is not to prevent fraud. We, in our daily jobs, don't give people an absolute assurance that the fact that we are there will catch everything... the responsibility of all these is definitely management on the board...*

The primary responsibilities of a regulator encompass reviewing and assessing an organisation's compliance risk and control frameworks. Their crucial role ensures that institutions adhere to established rules, regulations, and contracts. As one of the multiple lines of defence within an organisation, regulators work alongside boards, governing bodies, senior management, and all employees to create a well-managed environment that complies with rules and regulations. Regulators cannot guarantee absolute protection against fraud, but their role is to take reasonable action to maintain a high standard of oversight and escalate non-compliance issues when necessary. Ultimately, the responsibility for compliance lies with the

institution's management and board. Whilst the regulator's role is to support and monitor compliance, it is the institution itself that must be held accountable for its actions.

#### 6.2.4 The connection between the QFC's central business activities and the task of addressing fraud cases

Indeed, the QFC neither had nor should have held a strategic competency or competitive advantage in managing cases of fraud or wrongdoing. Addressing such cases has been characterised as a peripheral and expensive responsibility by the QFC's consultation team. They have proposed that the most effective solution to diminish the identified inefficiencies and create value for the QFC lies in delegating its authorised firms to establish and execute whistleblowing 'policies' in accordance with the established 'framework'. This approach not only streamlines the process, but also fosters a culture of transparency and accountability, ultimately benefitting the QFC and its stakeholders. The director of the Policy department in QFCRA Policy Department highlighted that:

*protective reporting framework that that's the name of our if you like whistleblowing rule requirements that apply to our enterprise firms that is set out in our general rules 2005.*

Also, the compliance officer at an authorised bank noted:

*...it is mandatory for each QFC entity to have or set its own whistleblowing policy and there is a special form that is requested by the regulatory authority.*

A proposed intervention to combat fraud and wrongdoing cases can yield significant benefits to organisations. By implementing a delegated whistleblowing framework, businesses can reduce the costs associated with managing such incidents, streamline management work, and foster innovation in the handling of fraud and wrongdoing cases.

The efficacy of this intervention is highlighted by an examination of the costs of managing fraud cases, which are not only significant but also represent a non-core activity that detracts from the organisation's strategic focus. Furthermore, managing fraud cases can be an inefficient process, further amplifying the cost implications.

By contrast, a delegated whistleblowing framework offers a range of benefits. Key personnel are unburdened from the task of managing fraud cases, enabling them to concentrate on their core competencies. Additionally, a collaborative network of whistleblowing actors, integrated at all levels of the process, can be created, promoting efficiency and a more effective handling of such cases.

The concept of concentrating on core competencies and shedding non-core activities resonated with QFC's managers, who found it familiar and sensible. Such cognitive familiarity often motivates people to adopt with an uncertain future (Lewis and Weigert, 1985; Wilson, McNellis and Latham, 2018), making the proposed intervention more favourable.

The QFC then set about implementing the delegated whistleblowing framework to achieve the desired benefits of cost savings and value creation. This move represented a crucial step towards realising the proposed future of the organisation, one that emphasises efficiency, collaboration, and innovation.

Overall, QFC can benefit greatly by adopting a delegated whistleblowing framework to combat fraud and wrongdoing cases. This intervention promises to reduce costs, streamline management work, and foster innovation, while freeing key personnel to focus on core competencies. By creating a collaborative network of whistleblowing actors, businesses can create a more effective and efficient response to such incidents. The QFC's successful adoption of this framework is a testament to the benefits it can offer.

**Matters of concerns:**

- Costly: keeping 2 channels
- Chaotic situation: no policy in place
- Costly: developing policies
- Fast growing in number of authorised firms
- Pressure to enhance the trust outlook

**Triggered  
Future  
Uncertainty**

**And**

**QFC  
Formed  
Consultation  
Team**

**Process of investigation and identification:**

- The identification of the function responsible for managing fraud cases
- The essence of the QFC's primary operations
- The connection between the QFC's central business activities and the task of addressing fraud cases

Figure 10: The dynamics of macro world in the QFC

## 6.3 Calculations: developing and evaluating a Whistleblowing Framework

Before initiating any fraud reporting, it is crucial to identify the individuals or entities involved, ascertain the nature of the reporting subject, and delineate the terms and conditions under which the fraud will be reported. Specifically, it is essential to clarify the concept of ‘value’ to be achieved, identify the trustworthy framework statements that maintain accountability for all parties, and elucidate the terms and conditions for delivering the defined value. This discussion illustrates the QFC’s endeavour to establish a dependable whistleblowing framework and develop value-generating policies, thereby fostering trust in the system.

### 6.3.1 Activities to identify trustworthy whistleblowing framework that yield value

The process of selecting framework statements involved a series of routine operations aimed at achieving the ideal practice, as demonstrated in Table 7: Developing and Evaluating a Whistleblowing Framework (Translation 2). One might wonder which routines the QFC implemented and why. In order to determine the statements for the whistleblowing framework, the QFC conducted a public consultation. Their rationale for this approach was to establish a whistleblowing framework they could genuinely know and trust, as stated in the QFCRA-press release (2017).

Initially, five potential international practices known to the QFC were analysed and considered for selection. While the QFC’s prior experience with these international best practices facilitated their analysis and selection, they were not immediately deemed suitable for implementation. Further work was necessary, and the QFC needed sound justification before choosing which framework statements could reliably deliver the value they sought.

Interestingly, the QFC decided against distributing a detailed document outlining criteria and requirements at the beginning of the framework statements selection process. Instead, they opted for an experimental approach to develop these requirements, which would serve only as a ‘framework’. This methodology was acknowledged as relatively unconventional within the QFC. The policy director outlined the reasons behind the decision:

*... the rules aren’t particularly lengthy. And in terms of our process of putting the rules in place, I mean, that they’ve been in place for a couple of years. Well, two years. So I think. And, you know, we’ve had enough time now, where we have some experience and how firms have been implementing these requirements and in detail gives the QFCRA dealing with whistleblowing report.*

Rather than adhering to conventional definitions of requirements, a combination of official and informal discussions took place. These sessions proved to be highly productive, allowing the QFC to evaluate the extent of innovation incorporated within the framework statements. By using these discussions as a platform, the QFC emphasised their objective for outcomes to be co-determined through extensive communication and information exchange. It was deemed by the director of prudential supervision that the QFC had submitted more particular information than was customary:

*... the only reason I say this is that when, what I’ve noticed, what I’ve observed, especially when I started working in the QFCRA, is I have actually benefited from the insights of a lot of our colleagues from different jurisdictions, in essence, where some decisions are very mature, and will be way ahead in terms of what actually happens in mature legislation. So it’s almost like you learn from the best practices of other jurisdictions, not in any way saying that. Because we don’t do that we are not doing the right thing, but just trying to understand that these aspects work differently in different regulatory regimes and different legislative regimes. And so from that perspective, but*



*we're in my perspective, if I'm reflecting on it, Anything I tell you anything that is outside the QFC and QFCRA, I'll probably point out the experience and tell you the example I've seen.*

The compliance officer at a bank authorised by the QFC also emphasised the collaborative development of 'requirements':

*...the documented whistle blowing policy and procedures that is endorsed by the board of directors of the organisation... When we draft the policies and procedures of the whistleblowing it should be reviewed and discussed by the board members and once the board members okay endorse it which means approve it, it is final... that is okay, that is in compliance with the regulatory rules and regulations and it is reviewed and endorsed slash approved by the Board members... These board members are being approved individually by the regulatory authority. Each one has been approved by the regulatory authority. Each one has reviewed this word policy and procedure each one has signed and approved it ...since it is approved, it is an ideal document that you should refer even if it is the first time I raised the red flag and raised my voice there is a misconduct within the organisation done by this X or done by this department.*

The consultants pledged to devise solutions that would enable them to share value and mitigate risks. It is evident that, at this stage, the process of selecting framework statements relied on a range of interrelated activities conducted concurrently: beginning with a small, familiar set of practices, exchanging knowledge, and collaboratively creating framework statements. Additional activities were also undertaken.

The QFC team members presented the proposed framework through a series of demonstrations and engaged in discussions with QFC-authorized firms during several town hall meetings. This interaction aimed to boost confidence in the framework statements' capacity to perform as outlined in the proposed framework. As a result, the QFC gained increased assurance in the efficacy of the framework statements as documented.

*...taking a step back to what happened in 2017. So when we go through any process of refinement of our rules, or issuing new rules, there is a very good consultative process. And once the rules are promulgated, we normally do conduct what we call town hall meetings where we invite individuals from institutions, especially compliance risk, and maybe the SCA will also attend... (The director of prudential supervision)*

A robust consultative process is crucial when refining existing rules or introducing new ones, as it guarantees that the rules are well-conceived and effective in addressing pertinent issues. Holding town hall meetings following the establishment of framework is a valuable practice, which involves individuals from relevant institutions, especially those in compliance and risk. The primary objective of these meetings is to guarantee that all stakeholders are well-informed and understand the framework.

*...try to add to create awareness and explain the policy position, what the rules aim to do, and what their responsibilities are ...the requirement for the whistleblowing framework to provide regular training. So it is the responsibility of their management to actually ensure that there is regular training to all staff on whistleblowing ...whether we have done any additional awareness sessions on whistleblowing since we released the rules, apart from the town hall meeting. (The director of prudential supervision)*

The objectives of town hall meetings include raising awareness, clarifying the framework position, elucidating the goals of the framework, and defining the responsibilities of all involved parties. There is a necessity for regular training on whistleblowing within the framework, with management bearing the responsibility of ensuring that all staff members receive this training. A question arises regarding the existence of any additional awareness sessions on whistleblowing since the release of the framework, aside

from the town hall meetings. This inquiry highlights the significance of continuous education and awareness in guaranteeing the effectiveness of whistleblowing policies and procedures.

*... from a few talking, once we issued the rules ... we did a town hall where this was explained to the firms. But internally, even for internally. The there was a presentation on whistleblowing and how to go through the process. But if you're talking about internally, then it's just a matter of we had a session and this is like the steps that you need to do for whistleblowing, but from supervisor perspective, how to deal with whether it's actually from each department ... how to deal with a whistle blowing. (Associate Director, Investment Manager, Advisor and Securities Supervision at the QFCRA supervision department)*

The presentations served a dual purpose: not only did they function as a means for the QFC to assess whether they could ultimately trust the framework statements to deliver results, but they also acted as a mechanism to attract whistleblowers. The implementation of a training and awareness programme for the firms' supervisors would empower them to develop an effective policy.

Certain framework statements underwent the Customer Dispute Resolution Scheme (CDRS) procedure to showcase their ability to generate value as pledged. Subsequently, the QFC consulting team sought validation from professional referees to verify these components. In the process of establishing trust, reference checking was deemed a vital step. The Associate Director in the QFCRA enforcement department stated:

*...we are having a customer dispute resolution scheme and whistleblowing scheme. And we are doing the regular work for enforcement like investigation and other things advices. So we are all talking about little bit CDRS with coming through, because some reference we received couldn't be out of the scope and this should be addressed to customer dispute resolution scheme.*

Thus far, this study has primarily examined how the consultation team utilised calculative methodologies to translate initial concerns into well-defined issues characterised by waste, inefficiency, and non-core functions. The introduction of a whistleblowing framework emerged as the solution. In creating this framework, it was essential to identify suitable entities and invest considerable effort in determining reliable framework statements.

Establishing trust in these framework statements required a series of evaluations. Initially, the focus was on statements previously managed by the QFC and those already familiar to the organisation. Additionally, departments that could collaborate with the QFC to generate innovative suggestions were considered. These departments needed to demonstrate successful discussions, convince the QFC of their ability to deliver as stated in the documentation, and pass reference checks. Through this rigorous evaluation process, the identity of the selected statements within the framework became increasingly well-defined and solidified.

Activities to identify trustworthy whistleblowing policy	Evaluation Criteria for Policy Statements
<ul style="list-style-type: none"> <li>- Utilise familiar international standards</li> <li>- Share information via formal and informal meetings (less detailed)</li> <li>- Collaboratively develop the framework</li> <li>- Provide demonstrations and training for supervisors</li> <li>- Cooperate with other departments</li> </ul>	<ul style="list-style-type: none"> <li>- Operational capacities, including knowledge, international implementation, training programmes, corporate culture, compatibility with QFC, ability to achieve desired outcomes, and quality assurance</li> <li>- Emphasis on the value of "Fraud Reporting Fearless"</li> </ul>

### 6.3.2 Assessing framework statements as standard procedure

While the identities of the framework statements became more apparent, a crucial task remained: assessing and selecting the most suitable options through careful calculation. It was essential for the QFC to make informed decisions based on comprehensive evaluations. The question arises, how did the QFC compare various framework statements? Furthermore, what was the process to ensure that these statements adhered to a standard practice?

There was a prevailing assumption that comparative analysis would be instrumental in determining the final selection of framework statements, especially since the costs associated with fraud and wrongdoing motivated the creation of the framework. However, the analysis of framework statements was perceived as vague or nonsensical, and its impact was limited to modifying beliefs. Consequently, this information was extracted and forwarded to the policy department for further evaluation, leaving the selection team with purely functional data. As a result, detailed information from supervisors, industry or international practices would only be permitted to influence the decision-making process if it led to substantially distinct outcomes.

*... the authorised firm needs to have systems and controls in place to allow for an anonymous protected report or a confidential, protected report. So we don't go into, you know, more detailed than that, I mean, we leave it up to the authorised firm to put in place the systems and controls, but they must use all the best endeavours to make sure that the report remains, the report remains confidential and what a reporter went anonymous... so it's up to the firm to make sure that happens ... we haven't had feedback from industry yet where they're requesting a change. And our supervisors have not given us any feedback on the framework to prompt the change. And then finally, I don't think there's been any developments on the international standards front, in respect to whistleblowing, that would prompt us to, to change the framework. But as I say, we do keep it under continual review. And as I said earlier, we're two years in now of having the rules in place. You know, we'll probably need a bit more yet, maybe more time to reassess the framework and gains or case experience or, or experience from the implementation of the framework before we decide to make any change. (Director of the Policy Department, QFCRA)*

Remarkably, the initial focus on cost considerations (matters of concern) was briefly set aside, and the evaluation of framework statements shifted its emphasis to a different aspect. What was this new focus? To start with, the QFC aimed to assess the operational capabilities of the framework statements, including international knowledge and implementation, training programmes, corporate culture compatibility with the QFC, the ability to achieve desired outcomes, and quality assurance. These factors were considered crucial in determining how the framework would support the QFC-authorized firms.

After establishing this baseline, the assessment concentrated on discerning whether and how these capabilities would contribute to achieving a “Fearless Fraud Reporting” environment. It is important to note that the policy advocated for “Fearless Fraud Reporting” as a means of expressing its dedication to fostering a mutually beneficial, value-creating relationship with the public.

*... any wrongdoing, particularly in relation to consumers and customers is identified, a very good way of doing that is, is having a framework where people could come forward, this will blow away protecting imports, safely, without fear of being you know, without fear, I was just gonna say attacked, it's probably the wrong word, but fear, you know, some of the reaction from authorised firms. So, you know, it's partly market intelligence, it's partly wanting to ensure that we have a robust regulatory framework that protects both consumers and the integrity of the QFC generally. So that you know it, I think, primarily, it's consumer protection focused, but it's also the sort of safety, safety and integrity of the financial services sector. (Director of the Policy Department, QFCRA)*

Similarly, Internal Audit Manager in a Big-4 audit firm (under the QFC authority) noted that reporting confidently without fear is the notion behind the policy.

*...whistleblowing It means that there is something sensitive needs to be reported. Some people, they don't feel confident, they don't feel it is going to be kept. They will not be harmed, it's going to be kept safely. So for whistleblowing at the end the concept of the whistleblowing, it's about making everybody feel comfortable of reporting, and give more details... my main concern was to blow the whistle when I want to talk about something that should be anonymous The first thing the second thing when when something will affect the reputation of the company. The third thing when my colleagues are aware of some are would like to talk about something or they don't have the power or they are afraid of something then they should use the whistleblowing.*

In an unexpected turn of events, the initial objective to minimise costs evolved into an endeavour to foster accountability. As a result, the selection process became dependent on the extent to which the QFC could achieve a “Fearless Fraud Reporting” environment, thereby enhancing its overall value.

*... But all common common to all frameworks is this need for the reporter to be protected. This is a concept. You've got to give the ball to others who have lower confidence, if they're going to say something about wrongdoing, that they're, they're not going to be put in harms way or subject to any come back for genuinely making a risk. wrongdoing report. So I think that's common to all frameworks, it's absolutely crucial that the person is protected... (Director of the Policy Department, QFCRA)*

In this context, the development of a robust whistleblowing policy, grounded in the regulatory requirements and the whistleblowing framework established by the QFC, plays an essential role. By aligning with these guidelines, organisations can ensure the effectiveness and relevance of their policies.

*Compliance is a must... If there is no protection, it's meaningless, it's meaningless, and nobody will take the action... (The Compliance Officer in a QFC-authorized bank)*

Particularly, the protected whistleblowing policy requires attention, as it highlights the necessity of providing safeguards to whistleblowers. Without such protection, these policies would lose their intended purpose, and individuals might be deterred from stepping forward to report any misconduct. Therefore, it is important to ensure that compliance measures are effectively enacted, and that the protection of whistleblowers remains a priority within an organisation.

The significance of Fraud Reporting Fearless was calculated by comparing it to other framework statements. This evaluation, conducted within the QFC framework, led to the conclusion that Fraud Reporting Fearless demonstrated the highest level of efficacy when aligned with policy statements in such as the OECD guidelines and Article 16 of the QFC Employment Regulations (QFCRA-Consultation Papers, 2017). Consequently, the consultation team elected to develop a framework guided by these international standards.

OECD policy statements and Article 16 have been implemented and endorsed by numerous global jurisdictions. While Baloria, Marquardt and Wiedman (2017) argue that monetary incentives for whistleblowers, particularly regarding corporate fraud, have proven highly effective in the United States, the QFC ultimately decided not to offer financial rewards for whistleblowing. Instead, the QFC focused on encouraging reporting in good faith and ensuring robust protection for whistleblowers.

Though authorities often struggle to protect whistleblowers from retaliation, which can be challenging for courts to address, the QFC's approach prioritises protection and support over monetary incentives.

Regulators have expressed concerns about the effectiveness of monetary rewards in motivating whistleblowers (Lee and Xiao, 2018), and whistleblowing schemes as accountability mechanisms have faced general criticism. Instances of whistleblowing could stem from malicious grievances, minor issues, or employee resentment (Miceli and Near, 1992; Bowen, Call and Rajgopal, 2010a).

By adopting a policy framework that considers these complexities and aligns with internationally recognised guidelines, QFC-authorised can develop a whistleblowing policy that promotes accountability and supports the protection of whistleblowers, without relying on financial incentives. This approach emphasises the importance of good faith reporting and reinforces a culture of transparency and ethical behaviour.

## 6.4 Framing the microcosm ‘the whistleblowing framework’

The ‘document’ serves as a crucial instrument in the social construction process, establishing the framework within which various concepts are defined and understood. The term ‘frame’ encompasses a diverse range of notions, including ideals, societal concerns, metaphors, and opinions. According to Koon, Hawkins and Mayhew (2016), frames can be categorised based on their level of abstraction, ranging from all-encompassing ideological orientations to specific policy positions.

### 6.4.1 Beyond mere documentation: a strategic approach to compliance

In this context, the ‘frame’ not only embodies the whistleblowing statements but also lends it a sense of tangibility by endowing it with legal recognition, identifying key actors, and allocating responsibilities amongst them. The document’s formal structure provides a systematic approach to understanding and addressing the complex issue of whistleblowing in the accounting sector. By establishing a coherent framework, it enables key stakeholders to navigate the complexities of the subject and promotes a consistent approach to handling related incidents. As noted in the fieldwork, for example:

*so you are protected. I have a legal documents. Yes, like a passport, a legal passport, you can go from one place to another. This is it's a passport, you have a legal document, it is endorsed by the concerned parties that are board members. (The Compliance Officer in a QFC-authorized bank (Bank))*

The whistleblowing framework document’s persuasive nature encourages adherence to its principles by outlining the benefits of whistleblowing, such as enhanced transparency, improved corporate governance, and the prevention of financial fraud. By highlighting these advantages, the document serves as a powerful tool for driving behavioural change and fostering a culture of accountability within the accounting profession. Two aspects of the drafting process for the whistleblowing framework document are particularly significant.

First and foremost, to guarantee that the framework statements ‘would accomplish’ what they were intended to do, the QFC consultants met with the experts and debated and ‘jointly constructed’ a policy document that clearly defined the responsibilities and duties of all of the contributing ‘actors.’ (QFCRA-Consultation Papers, 2017).

*the regulatory authority is responsible for the operation of the protected reporting, we can we can say like as whistleblowing in addition to provide the support of authorised firms, relevant independent functions. And regulatory authority is required the authorised firm under the QFC to have their own protected report framework in place. And enforcement is responsible, as I said, for recording, allocating monitoring and reporting all the whistleblowing reports received by the regulatory authority under general rules framework. (The Associate Director in the QFCRA enforcement department)*

The directors of the QFC posited that the well-articulated terms and conditions within the whistleblowing framework document emerged as a consequence of cooperative endeavours. This collaboration facilitated an in-depth understanding of the complexities surrounding the subject matter, ultimately leading to the development of a robust and informed framework.

Secondly, a significant portion of the efforts was focused on ensuring that firms authorised by the QFC understood and complied with the fundamental principles outlined in the whistleblowing framework document, referred to as ‘the philosophy’. The primary objective was to eliminate any potential ambiguity

or misinterpretation surrounding these principles. Within the QFC's whistleblowing framework, the document occupied a secondary position, while 'the philosophy' took precedence.

*it should be documented policies and procedures for the company more within the document because there whistleblowing that me and you are using this is the this is the tool, but behind the tool, there should be a policy that confirm that the whistleblowers will be protected. (Partner in a Big-4 audit firm under the QFC (Big-4 Audit Firm))*

One might wonder why 'the philosophy' was prioritised in this manner. This decision can be attributed to the QFC's recognition of the importance of establishing a robust foundation upon which its regulatory framework could be built. By placing 'the philosophy' at the forefront, the QFC ensured that all authorised firms operated with a clear understanding of the core principles, which in turn promoted consistency and compliance across the board.

The emphasis on 'the philosophy' was a strategic choice made by the QFC to provide a strong and consistent foundation for its authorised firms. This focus aimed to foster a clear understanding of the fundamental principles, thus minimising any risk of confusion or misinterpretation, and ultimately ensuring a more effective regulatory environment.

*...this document is not on the paper is a procedure that should be followed by the employees from the bottom to the top and it should be properly implemented... Any policy that should not be a paperwork, it should be adequate and effective... So, it should not be at all symbolic, otherwise, we are cheating ourselves. As simple as it is, it is only a paper, okay, that's it, we have a policy, we satisfy our regulatory requirement... It's not just papers, we can do lots of papers, we can pull we can, we can say theory as long as as we can. But we have to implement we have to implement otherwise we are not successful... (The Compliance Officer in a QFC-authorized bank)*

Emphasising the importance of compliance, it is crucial for organisations to move beyond theoretical concepts and documentation, focusing on the practical implementation of policies. Ensuring policies are appropriate, effective, and more than mere symbolic gestures is vital in addressing potential challenges and delivering successful outcomes (Calderón, Piñero and Redín, 2018). In the context of whistleblowing policies, this means offering sufficient protection and fostering a culture where individuals can report misconduct without fear of retaliation, thereby contributing to an organisation's overall success.

#### 6.4.2 Establishing predictability: a strategy for strengthening the Whistleblowing Framework

The primary focus of the QFC appeared to be the establishment of shared values and behavioural norms. The intention was to create a seamless integration of whistleblowing framework document within QFC-authorized firms, allowing for a smooth and efficient implementation process. The question then arises, what was the underlying concept both preceding and succeeding the whistleblowing framework document? Furthermore, what was the origin of this particular idea?

Although 'the philosophy' behind the whistleblowing framework document was not explicitly defined, it seemed to involve fostering a cooperative relationship with the QFC-authorized firms, which would operate in a highly predictable and unambiguous manner. In order to achieve this level of predictability, four key components were devised and put into place.

##### 6.4.2.1 The device of the hypothetical scenarios

First, the operational reporting procedures were examined, and ultimately, they were translated into essential criteria, as illustrated in Table 6. These criteria were subsequently incorporated into the

whistleblowing framework document. A significant number of staff members were employed in the laboratory to develop these procedures.

To begin with, the expectations and methods of communication within the network were standardised and clearly defined. Furthermore, it was necessary to outline the scope of the whistleblowing framework. Both the consultants and policymakers strived to achieve these goals through a collaborative, exploratory approach: the use of ‘hypothetical scenarios’.

These plausible yet fictitious scenarios were created based on the assumption that a consistent model of whistleblowing relationships could be established. By employing this method, the professionals involved aimed to ensure the effectiveness of the whistleblowing framework and the overall coherence of the operational reporting procedures.

*...there are certain documents that need to be explained well to the staff, okay, you are not experiencing this you may experience this for the first time you should be ready if you experienced this what to do to whom you have to raise your voice to whom you have to communicate and what will be the end result... there is input and output. When we do the input, we have to expect a good output if we didn't train if we didn't train, okay the staff on how to input how we can get a good output you got my point? Yeah. So, there is there are two scenarios before and after. So, before it is chaotic, nobody knows what to do. (The Compliance Officer in a QFC-authorized bank)*

As deduced from the previous statement, the ‘hypothetical scenarios’ encompassed a typical narrative of recurring events, which included the progression of whistleblowing reports. The underlying objective of this approach was to establish behavioural guidelines that would delineate appropriate conduct in specific situations.

For example, by consistently processing the whistleblowing reports within these scenarios, the involved parties could allocate responsibilities to one another, identify the reasons for taking action, and explicitly distribute risks and accountability among themselves. This structured approach allows for a clearer understanding of the expectations and consequences within the whistleblowing process, ultimately contributing to a more effective implementation of the policy by the QFC-authorized firms.

*...institutions, they have boards and governing bodies, senior management, and all employees are the ones that are responsible for ensuring that they conduct the operations in an environment that is well managed, that complies with the rules, regulations, and contracts... there could be instances at the end of a cycle or something has happened, that the blame could be on the particular supervisor. He knew of something, and a fraud happened and he didn't take action. The responsibility of the regulator is not to prevent fraud...What we do is we will take reasonable action to make sure that we perform our work even in an environment where it is a high standard such that if elements of non-compliance are noticed, then we'll be able to escalate them to the right levels. But the responsibility of all these is definitely management on the board. So that's very, very important because without any doubt on a daily basis, when we interact with our institutions, we find instances of control. We can assess instances of non-compliance with regulations. Those are not automatically whistleblowing! (The director of prudential supervision, the QFCRA)*

The above process establishes that all members of an institution, including boards, senior management, and employees, share the responsibility of maintaining a well-managed environment that adheres to relevant rules, regulations, and contracts. In this process, the responsibility of supervisors is highlighted. For example, if a supervisor is aware of potential fraud and fails to take action, they may be held accountable. This process clarifies the role of regulators, stating that their primary responsibility is not to prevent fraud. However, they should take reasonable actions to ensure that their work maintains a high standard and that any detected non-compliance is escalated to the appropriate levels. The QFC management reiterates that



the ultimate responsibility lies with management and the board, and not every instance of non-compliance necessarily constitutes whistleblowing.

The concept of ‘hypothetical scenarios’ served as a tool designed to facilitate the prediction of relationship dynamics. Moreover, this tool aided in the identification of factors driving these relationships, as well as in the subsequent establishment of guidelines. As a result, a set of narrative guidelines was constructed to effectively manage and regulate framework development, responsiveness in reporting, protection for reporters, and the achievement of reporting outcomes.

To enhance the effectiveness of these guidelines, the QFC consultants linked them to several mandatory requirements for the firms authorised by the QFC to operate within its purview. The intention behind this strategy was to strengthen the policy in order to align it with the established operational procedures for reporting.

*...regulatory authority is required the authorised firm under the QFC to have their own protected report framework in place. And enforcement is responsible, as I said, for recording, allocating monitoring and reporting all the whistleblowing reports received by the regulatory authority under general rules framework. (The Associate Director, the QFCRA enforcement department)*

#### 6.4.2.2 Steadfast whistleblowing framework

Second, the QFC has precisely crafted a ‘steadfast’ whistleblowing framework, delineating and introducing a comprehensive control structure. This framework ultimately limits the options available to QFC-authorised firms in terms of formulating their whistleblowing policies. The framework encompasses a wide range of procedures and is rigorously assessed on an annual basis. This review process incorporates the valuable input of supervisors, industry professionals, and international stakeholders, ensuring the framework remains relevant and effective within the QFC.

*... the high level overview of that framework is it's it's designed to provide a framework... these are all requirements apply to our firms. Okay, the firms that we supervise, and then what the rules require is that those firms manager for the insurance company, they have to have policies and procedures in place to deal with whistleblowing... At this stage, I don't think we're planning to make any changes to the framework. The legislation will remain in place. So, you know, as we've all legislation, you always keep it under review, and updating accordingly, depending on industry feedback, or supervisor feedback. But at the moment, it's intended to remain as it is, and we'll continue to monitor it. Adapting necessary, adapt if we need to, in light of the spirits of the framework. (The policy director, the QFCRA)*

The QFC management highlights the primary objective of the framework, which is to offer a structured avenue for the QFC-authorised firms to craft their own whistleblowing policies in which whistleblowers or protective reporters can disclose any perceived misconduct within authorised firms. The framework thus creates a safe and organised environment for reporting such concerns.

The policy director outlines the obligations of authorised firms to establish an independent unit within their organisation, responsible for managing protected records. The firm’s board or governing body is entrusted with the task of setting up this function.

Following from the above, the QFC emphasises that the independent function must be supported by a set of approved policies and procedures. Additionally, adequate resources should be allocated to this unit, with consideration given to the size of the institution. Here, the policy director provides an example of resource allocation, suggesting that a larger financial institution would require more resources to match its nature, scale, and complexity. In contrast, smaller firms might not necessitate such extensive resources:

*So, for instance, if it was a large financial institution, then you'd expect it to be, you know, it would have resources that that were, you know, to sort of match the nature scale and complexity of the firm. Equally, a smaller firm might not need such a depth of resource. But in any case, the authorised firm would need to have that function and policies and procedures in place.*

The most effective way to govern practices within these diverse companies is through the implementation of a standard or documented framework. A standardised framework ensures that QFC-authorised firms adhere to a consistent set of rules and guidelines, regardless of their size or structure. This creates a level playing field and prevents inconsistencies or confusion that may arise from a lack of uniformity in regulations.

*the only variation in order to govern the practices and all all of those companies is to have a standard or documented policy requesting all of those companies that falling under the regulator to come comply with a standard whistleblowing policy. (Partner in a Big-4 audit firm under the QFC)*

Regardless of the firm's size, the policy director reiterates that the independent function, along with appropriate policies and procedures, must be established within the authorised firm. Also, the QFC introduces the concept of branch firms and notes that the framework permits them to rely on their head office when dealing with protected records. The QFC highlights that whistleblowing frameworks are prevalent and that branch firms are allowed to depend on their head office operations to manage whistleblowing frameworks and protective reforms. This flexibility accommodates the needs of diverse organisational structures within the industry.

*So, as I'm sure you're aware, whistleblowing frameworks are quite commonplace. And if there is a branch per pair, then they could rely on their head office operations to deal with whistleblowing frameworks and protective reforms. (The policy director, the QFCRA)*

Numerous control factors referenced in the previous discussion are closely linked to resources, such as personnel. Importantly, the activities that necessitated the deployment of staff were assumed to remain constant within the assortment of procedures stipulated by the framework document.

#### 6.4.2.3 Value sharing of the whistleblowing framework

Third, the QFC consultants associated 'value sharing' advantages with the established whistleblowing framework, intending to diminish motivations for exploiting loopholes in the control system over time. As an example, they required each QFC-authorised firm to formulate its own whistleblowing policy, taking into account the principal whistleblowing framework.

*The rationale for developing the policy was based on the belief that the introduction of such requirements for authorised firms would assist both authorised firms and the Regulatory Authority in the early identification of risks and potential wrongdoing. (The QFCRA Enforcement department)*

The motivation behind developing the policy stemmed from the conviction that implementing such requirements for authorised firms would aid both the firms and the regulatory authority in promptly detecting risks and potential misconduct. And "when there is a policy for reporting and whistling, this may encourage the accountant to report on this case through the dedicated reporting channels and hotlines" (Assistant Manager of Internal Audit, big-4 QFC-authorised firm).

*Being confidential, and at times anonymous, it minimises the implications on the individual or the firm. However, as whistleblowing exposes wrongdoings that were not evident to the QFCRA prior, its implications internally is the enhancement and development of internal procedures and regulation and thus, is a more robust framework. (The QFCRA Enforcement department)*

A well-established whistleblowing policy, complete with reporting channels and hotlines, encourages employees to take action and report any misconduct they witness. This helps maintain a culture of integrity and transparency within the organisation, ultimately benefiting all stakeholders.

The significance of confidentiality and, occasionally, anonymity in whistleblowing serves to mitigate the effects on the individual reporting the matter or the implicated firm (Fasterling and Lewis, 2014; Strassberg and Harrington, 2015). This safeguard incentivises a greater number of people to reveal transgressions. By associating ‘value sharing’ benefits with the established whistleblowing framework, QFC consultants aim to reduce motivations for exploiting loopholes in the control system over time. Furthermore, whistleblowing discloses wrongdoings that were previously undetected by the QFCRA, prompting the enhancement and development of internal procedures and regulations, thereby facilitating more effective risk management and prevention of misconduct. The incorporation of whistleblowing leads to a more robust and resilient framework, as it assists in identifying and addressing wrongdoings that may otherwise remain undiscovered.

In order to address the risks linked to internal control loopholes, it was deemed essential to associate ‘value sharing’ with the development of whistleblowing policies (Vandekerckhove *et al.*, 2016). These policies must be aligned with industry best practices to improve the control environment, thereby strengthening control activities. Whistleblowing was considered a vital aspect of the control process and related activities. The Human Resources Manager of an authorised bank under the QFC corroborated these assertions, stating that integrating whistleblowing components within a structured policy would contribute to bridging the gaps in internal controls. He appreciated the steps taken by the QFC:

*We had bits and pieces of whistleblowing here and there, and now it has been compiled into a policy, it's definitely it's as per the requirements and of the regulatory authority, the Qatar financial centre. So definitely things are moving in that direction, to emphasise the importance of whistleblowing as an integral part of the internal controls and inside a company, and, or a bank or a financial institution.*

#### 6.4.2.4 Sharing of information between QFC and its authorised firms

Fourth, establishing an open-access report system enables the QFC to effectively trace the progression of whistleblowing policies across various locations and timeframes. This empowers the QFC to supervise and track the development of these essential policies and whistleblowing. Open-access report systems are typically associated with honesty, fairness, openness, and transparency – the cornerstones of a trustworthy relationship.

To accomplish this, the QFC-authorized firms must integrate their whistleblowing information systems with the QFC, thereby facilitating seamless online access. By doing so, the QFC gains the ability to track reported concerns and their underlying reasons within the open-access report. For the QFC team, monitoring these reports is instrumental in identifying key drivers of control and serves as a solid foundation for enhancing control measures.

As control mechanisms become increasingly transparent, the QFC expects that QFC-authorized firms will be motivated to improve their processes and effectiveness. Over time, this is anticipated to result in a reduction of control loopholes, thereby fostering a more secure and accountable environment for all stakeholders.

The analysis presented illustrates the diligent efforts of QFC consultants in fostering a collaborative environment among whistleblowing stakeholders, such as QFC departments and authorised firms. A model has been developed to showcase the workings of the whistleblowing framework, which reflects the principles behind the policy document. This model emphasises the importance of establishing predictable behaviour, mutual value sharing, and information exchange as the foundation of a robust and reliable system.

To achieve this, criteria have been devised through hypothetical scenarios, which outline the capacity to monitor, supervise, and control the development of procedures. By implementing the whistleblowing framework in its intended form, uncertainty is significantly reduced. This approach limits the range of options available to authorised firms when it comes to whistleblowing procedures, thus ensuring consistency and compliance.

Furthermore, the exchange of reporting information is facilitated through effective system interfaces, allowing the QFC to gain swift and hassle-free access to the reporting data of all authorised firms. This optimised access to critical information enhances the QFC's ability to maintain oversight and foster a cultural environment of transparency and accountability.

Cultural control is explicitly acknowledged as a cornerstone for establishing trust and a means of ensuring accountability among QFC-authorised firms. "People will be held accountable...there is a policy of whistleblowing in the company" (Assistant Manager of Internal Audit, big-4 QFC-authorised firm). By introducing whistleblowing policies, companies send a clear message to their employees that they take accountability seriously. This, in turn, helps build trust among employees, as they know that wrongdoing will not go unnoticed or unaddressed. Because "the employee began to feel free to complain, he has a hotline, he has an email, and he has a special site to receive reports of violations" (Assistant Manager of Internal Audit, big-4 QFC-authorised firm).

When employees in the QFC-authorised firms are provided with accessible and confidential channels for reporting concerns, they feel more secure and supported. This feeling of safety encourages a culture of openness, where employees are more likely to share their concerns, knowing that they will be taken seriously and acted upon. Trust is thus established when employees are confident that their voices will be heard without fear of retaliation.

*The whistle-blowing policy has promoted transparency and accountability amongst the people in the QFCRA. As it has provided a safe environment to report any wrongdoing, it has also promoted professionalism and responsibility in the QFCRA. (The QFCRA Enforcement department)*

The aforementioned observations emphasise the importance of building trust on the foundation of clear and mutually shared expectations regarding the various responsibilities involved in meeting the outlined criteria. Establishing trust is significantly influenced by the sharing of information related to fraud reporting and monitoring, which is an integral part of the guiding philosophy behind the policy document.

For QFC-authorised firms, willingly disclosing their whistleblowing reports not only subjects them to potential oversight by QFC management, but it also demonstrates their dedication to transparency and accountability. In response, this commitment indicates that these firms trust QFC management to use the information judiciously. The analysis aligns with the idea that management control systems can serve as a basis for trust, as suggested by Flamholtz, Das and Tsui, (1985), Emsley and Kidon (2007), and Goebel and Weißenberger (2017).

A key distinction between this research and other studies (e.g., Curtis and Taylor, 2009; Brink, Cereola and Menk, 2015; Guthrie and Taylor, 2017) is the emphasis on trust as a contextual practice, one that is rooted in the actors' definitions of expected and appropriate behaviour in specific situations (Vandekerckhove *et*

*al.*, 2016). It is also worth noting that in different contexts, such as within close-knit family groupings, performance evaluation may be perceived as entirely contrary to trust.

Despite the ‘strategies’ mentioned earlier, which were designed to ensure predictable behaviour, one must question whether they would function as intended. Will the proposed whistleblowing model, which allocated responsibilities and accountabilities in specific ways, be replicated in real-life situations? Furthermore, will the anticipated future of cost reduction and value enhancement materialise as a result of implementing these instruments? The following section presents actual whistleblowing practices that happened in the broader context of the real world.

## 6.5 Navigating struggles in the wider context

The relationships within the fieldwork did not develop as readily as previously demonstrated in the theoretical microcosm. In essence, the newly observed macrocosm failed to correspond with the hypothesised model found in the microcosm of QFC consultants and administrators.

A significant issue centred around the challenges in the macrocosm, specifically, the actual whistleblowing practice. This exposed participants' accounts of the whistleblowing reporting process, encompassing details about the investigation procedures that take place following a whistleblowing report. The challenges in the macrocosm consisted of newly identified concerns, both technical and cultural in nature.

Technical concerns included the lack of guaranteed protection in anonymous reporting and the questionable credibility of investigations into anonymous reports. Another concern that emerged from this analysis was the act of assessing and implementing whistleblowing measures, which entailed participants describing the objectives of whistleblowing policies and the culture surrounding them. This encompassed resistance to hiring whistleblowers, insufficient awareness of the whistleblowing policy framework, and a noticeable lack of clarity in policy statements, as acknowledged and discussed by associates of QFC-authorized firms.

Based on the field analysis, it was observed that these challenges deterred whistleblowers from acting upon the newly introduced whistleblowing policy. In summary, the identified challenges influenced the degree to which the policy was trusted and, consequently, put into action.

### 6.5.1 Protection process and struggles

Anonymity plays a crucial role in safeguarding whistleblowers during the disclosure of misconduct, ensuring their security. Nevertheless, whistleblowers have expressed concerns regarding trust in their employers, stemming from the fear of being unmasked if they were to report wrongdoing through internal channels. The protective measures encountered specific obstacles that hindered the effectiveness of the whistleblowing policy, primarily due to the absence of guaranteed anonymity. This issue is painted in Figure 11.

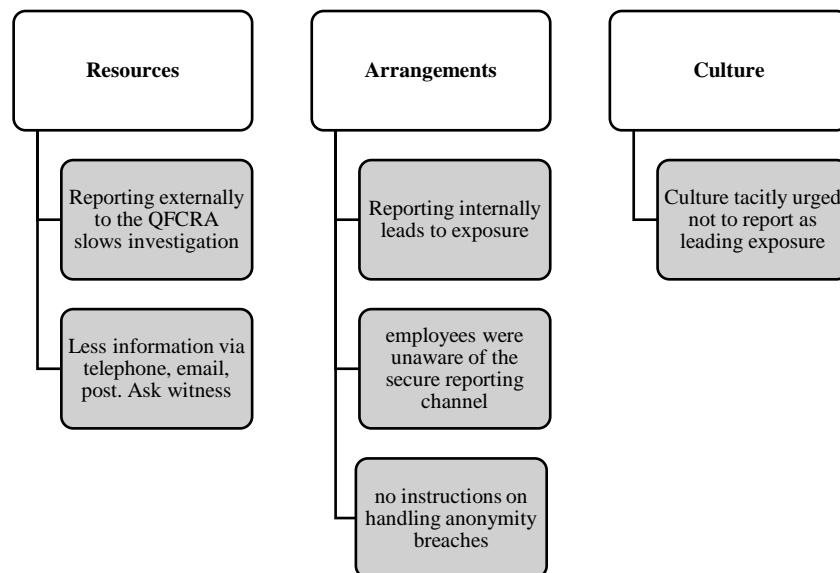


Figure 11: the struggles in the protection process

In the realm of whistleblowing, the assurance of anonymity and protection is important for those reporting misconduct. Through a comprehensive analysis, we have identified six key points that highlight the various challenges and concerns arising when the confidentiality of whistleblowers is not maintained within QFC-authorized firms. By examining different aspects of the whistleblowing process, such as the relationship between confidence and constraints, the influence of culture and mind-sets, and the efficacy of reporting channels, we can better understand the crucial role anonymity plays and the potential consequences when it is inadequately addressed.

Firstly, the individuals receiving reports of wrongdoing sought a certain degree of anonymity and protection. Whistleblowers often report externally to regulators when they lack trust in their authorized firms to handle allegations appropriately. They believe that external channels, such as regulators, provide greater security and confidentiality. Consequently, the extent of constraints is directly related to the level of trust. As the degree of trust increased, so did the challenges faced during the investigation process.

Secondly, the mind-set of individuals and the culture within their environments play vital roles. Implicitly, both people and culture discouraged employees from submitting allegations, as whistleblowers risked exposure. Employees who discovered misconduct were reluctant to report it to senior management, fearing that their situation would deteriorate. They were unwilling to jeopardise their safety or put their positions at risk.

Thirdly, internal reporting within a QFC-authorized firm was perceived as insecure. Reporting internally increased the likelihood of exposure, potentially revealing the whistleblower to others within the company and external organisations. Consequently, anonymity was not guaranteed, and reporting could devolve into a vengeful conflict between the reporter and the wrongdoer, as the whistleblower would likely be identified after submitting an internal report.

Fourthly, a significant number of employees remained unaware of the secure reporting channel. Anonymity was never assured during the whistleblowing process. Ideally, anonymity should be maintained; however, in Qatar, it may be compromised at any stage of the investigation.

Fifthly, even with the existence of internal and external channels, anonymity was not guaranteed. The framework did not adequately address confidentiality and anonymity, and there was a lack of guidance for handling such situations if they were to arise.

Sixthly, QFC-authorized enterprises implemented various reporting tools and procedures. Nonetheless, during an investigation, a company might require the whistleblower to disclose their identity and serve as a witness. In such cases, the organisation should extend support and assistance to the whistleblower.

#### 6.5.1.1 Protection via anonymity

Ensuring the safety of whistleblowers when they raise allegations is important. Regardless of the nature of the misconduct or the identity of the perpetrator, safeguarding those who shine a light on wrongdoing is indispensable. The process of protection should, ideally, maintain the anonymity of the whistleblower, thereby providing an added layer of security.

In instances where a whistleblower may have distrust towards their organisation, the appropriate course of action would be to report the concerns to external regulatory authorities. Such bodies can offer an additional layer of reassurance by providing a safe and secure avenue for the reporting of misconduct. With their assistance, whistleblowers can be assured that their allegations will be handled with the utmost discretion and integrity, thereby boosting their confidence in the process.

*... So here, I'm talking about two types. The first one that maybe the person is trying to talk negatively about someone a person who is he doesn't, he's not fine with the work that he's doing,*

*when the second thing that might be in the benefit of the company. But the whole idea is about keeping this whistleblowing process as an anonymous. (Partner in a Big-4 audit firm under the QFC)*

Achieving a certain degree of anonymity is brought about through enforcing confidentiality in the handling of whistleblowers' reports. This ensures the secure treatment of these sensitive disclosures. Indeed, a cornerstone of any robust whistleblowing policy is its insistence on absolute confidentiality. This approach not only preserves the identity of the whistleblower but also strengthens the effectiveness of the policy by encouraging potential whistleblowers to come forward without fear of reprisal.

*... you within the policy, there is a section about anonymous allegations and confidentiality, which is that all concerns will be treated confidentially with measures taken not to expose the whistleblowers identity... (The Compliance Officer in a QFC-authorized bank)*

In the construction and implementation of a whistleblowing policy, maintaining confidentiality in the reporting process is central to the overall framework. This crucial factor underpins the efficacy and integrity of such policies.

Organisations intending to adopt a whistleblowing policy must make concerted efforts to ensure the anonymity and confidentiality of those reporting any wrongdoing. It is necessary to construct safeguards against retaliation or punitive actions towards the reporter, regardless of the severity or scale of the allegations brought forth. This steadfast commitment to protection underpins a culture of transparency and accountability, enabling individuals to voice concerns without fear, thereby strengthening the ethical backbone of the organisation. The policy director at the QFCRA noted:

*... one of the key requirements is that the identity of the whistleblower, protected reporter, is made confidential. Okay, there's absolutely a central core element that framework because as I'm sure you're aware, it's really important for whistleblowers, protected reporters, to have the confidence that if they do make a report that they will remain anonymous. And if you like protected, protected from any repercussions or actions from the firm, or the individuals who work for them their firm. So it's, it's, as I said before, it's a core element of the whistleblowing framework. So enterprise firms are required as much as possible to protect the reporter and to keep the report itself confidential.*

The Policy Director at the QFCRA offered further insight, clarifying that this necessary degree of confidentiality ought to be achieved through the implementation of protective channels and comprehensive reporting methodologies. This approach has been emphasised by several participants in the fieldwork.

It is important that such a channel be strictly secured and precisely monitored by the designated recipient of the reports. This ensures that the sensitive information contained within remains strictly confidential, accessible only by authorised individuals and impervious to any unauthorised access. This level of discretion and security ensures the integrity of the whistleblowing process, fostering trust and encouraging transparent disclosure of potential wrongdoing:

*...in practice what, you know, fundamentally, that you authorised firm needs to do everything you possibly can to maintain materiality. So, in practice, I should imagine that would be something like, there will be a secure communication channel or reporting channel for whistleblowers. So they might be able to do that by telephone, or secure email. Or even if they wanted to, they could, I guess put it down in writing and send it to a secure address. (The QFCRA policy director)*



While securing the reporting channel is of great importance, certain participants highlighted that protective measures should extend beyond the act of reporting misconduct. It is important to ensure the continuing confidentiality and anonymity of the whistleblower, even after the initial report has been submitted. This prolongation of protection acts as a reassurance, affirming the ongoing commitment to the reporter's safety and privacy. Such an assurance fosters trust in the process, providing reporters with the confidence that their identities will remain safeguarded long after their act of whistleblowing.

*It's very, very important that when that protection Report is made, that the identity of the individual needs to be kept anonymous. (The policy director, the QFCRA)*

Regulatory authorities furnish companies with a guiding framework, leaving it to the discretion of each company as to how they incorporate a whistleblowing policy within their organisational fabric. However, it is strongly urged that businesses exercise additional care and thoughtfulness when applying these policies. The protection of whistleblowers, or those reporting wrongdoings, is not merely a box-ticking exercise. It is a core ethical responsibility that requires organisations to employ their utmost efforts. This is emphasised by the policy director at the QFCRA who alleged:

*I mean, we leave it up to the authorised firm to put in place the systems and controls, but they must use all the best endeavours to make sure that the report remains, the report remains confidential and what a reporter went anonymous.*

However, certain reservations have been expressed by whistleblowers regarding their trust in their respective organisations. These concerns stem from the belief that using an internal reporting channel might jeopardise their anonymity, leading to potential exposure.

Consequently, these whistleblowers often opt to bypass the internal channels, choosing instead to report the transgressions directly to the external regulatory authorities. This direct approach can provide an added layer of reassurance and confidentiality, thus addressing the whistleblowers' concerns about potential reprisals within their organisations.

*... whatever I haven't used for whistleblowers is if they don't feel confident going to the authorised firm and reporting to the firm, I can take another avenue and report to us the regulator. Okay. And that report is received by our enforcement function. Okay, and then they have to deal with it in an anonymous confidential way. (The policy director, the QFCRA)*

Indeed, reporting a whistleblowing allegation can be viewed as a process encompassing two distinct stages, each intrinsically linked to the whistleblower's level of confidence in the report's recipient. The Policy Director at the QFCRA shed light on this aspect by suggesting that if a whistleblower has mistrust towards their organisation, they should direct their report to external regulators.

Regulatory authorities are designed to inspire heightened levels of trust due to their objective position and rigorous methods. These bodies serve as an additional assurance that the whistleblower's concerns will be handled securely and appropriately. Such an approach can reinforce the whistleblower's confidence in the process, encouraging a culture of openness and accountability. The director of prudential supervision at the QFCRA noted:

*And I liked the way our our enforcement team handled some of these matters, because they did not disclose even though we knew where this came from, they did not disclose to anyone else, who the identity of this person is they went about doing the work and ensuring that it works very well.*

The initial stage in the whistleblowing process at the QFCRA involves the whistleblowing team receiving the report from the whistleblower. Once received, they then pass this information on to the enforcement team. It is important to note that this transition is carried out with an intent to heighten the level of confidentiality.

In this respect, the whistleblowing team does not share any detailed information with the enforcement team. Rather, their role is to report the case and the associated transgressions, only after full sanitisation. This careful processing of sensitive information adds an additional layer of protection, safeguarding the whistleblower's identity and reinforcing the confidentiality of the entire process. The Associate Director, Investment Manager, Advisor and Securities Supervision at the QFCRA supervision department asserted that:

*... the whistleblower team do not actually share with us the names at all. They don't tell us anything. They just say this, this the issues that we're facing with those who are blowing and you need to deal with it. So it is pretty much confidential from the whistleblowing team.*

As previously outlined, the Associate Director of Anti-Money Laundering and Combating Financial Crime at the QFCRA's Supervision Department emphasises a heightened degree of security in their process. They ensure this by not directly passing on the report submitted by the whistleblower. In fact, the team goes a step further to maintain the integrity of the process and the security of the whistleblower. Rather than forwarding the original report, they compile a separate report, which is then sent to the enforcement team. Prior to transmission, this report undergoes meticulous sanitisation. This extra measure ensures that the confidentiality of the whistleblower is robustly protected, further enhancing the security of the whistleblowing process:

*I also have known at least in the limited experience I've had with them that enforcement also. They don't give you the direct report you get. Yeah, that's right. You get a summary so that none of the information can identify the person who's made the whistleblower report the protected report*

The intention behind this process is to instate a more robust level of confidentiality, ensuring the safety and protection of the whistleblower. However, while the recipients of the wrongdoing reports necessitate such rigorous confidentiality and protection measures, this heightened level of secrecy can pose certain challenges to the investigation of whistleblowing allegations.

Indeed, an overly confidential approach can constrain the investigation process, creating a slight balance to be achieved. Despite these challenges, regulators continue to encourage whistleblowers to provide a minimal amount of personal detail. This enables the authorities to revert with the outcomes of the investigation and provide feedback. Balancing this confidentiality with the need for effective investigation highlights the complex, different nature of the whistleblowing process.

*... the policy encouraged the employee who is the whistleblower, to put his name to his allegation whenever possible, whenever possible. But if the employee does not reveal his identity, this might create constraints to protect his position or to provide them with feedback... (The Compliance Officer in a QFC-authorized bank)*

Difficulties can arise when a whistleblower, despite the protections in place, lacks trust in their organisation's ability to handle their allegations responsibly. In such instances, the whistleblower might bypass their company and take their concerns directly to the regulatory authorities, specifically the whistleblowing team. These regulators are trained to handle such reports with utmost confidentiality, passing only sanitised and minimal information on to the enforcement team. Consequently, very little, if any, information about the whistleblower's identity is disclosed.

This situation elucidates how the constraints on an investigation are intrinsically tied to the confidence level of the whistleblower. It forms a sort of pyramid structure for reporting channels; as the whistleblower ascends, bypassing their firm due to lack of trust and directly reaching out to regulators, their confidence in the system increases. However, this escalation also adds layers of complexity to the investigative process.

However, it's important to recognise the potential risks of external reporting. As pointed out by a member of the enforcement team, the whistleblower's identity could be exposed in the process. Any unauthorised release of information about whistleblowers, particularly if it becomes public knowledge, represents a significant policy breach within the QFCRA. Any such breach should be promptly reported to the appropriate authority for immediate action, underlining the commitment to maintaining the integrity and security of the whistleblowing process.

#### 6.5.1.2 Risk of Reporting

A partner at one of the Big-4 audit firms operating under the QFC emphasised during a fieldwork session that the act of reporting incidents or adopting whistleblowing can yield significant benefits for an organisation:

*Basically, the idea of also whistleblowing is that any person working in any corporate could deliver his messages or his concerns or anything that is not satisfied during in the company, to an anonymous person who can take an action and help this person in solving his problem first. Secondly, this might help the company in getting the benefits that they are looking for.*

However, when considering the reporting of allegations or fraud detected by employees, various factors must be thoughtfully accounted for. Primarily, the mentality of the individuals involved and the prevailing cultural climate are vital. As expressed by one participant, the mentality can indeed pose a significant challenge, particularly when individuals realise they are the subjects of reports. This awareness can prove unsettling, underscoring the importance of handling such circumstances with care and sensitivity.

*I don't think this would ever happen. That's that's, I don't know maybe because of the mentality. I think because of the mentality of the people that they were like, okay, no, we're gonna do something ... (senior associate of internal audit in a Big-4 audit firm under the QFC)*

Employees who discerned wrongdoing within the organisation often had fears about reporting the matter to senior management, concerned that the situation might escalate. The thought of risking their livelihoods, potentially placing their positions in jeopardy, was too great a deterrent. Therefore, as several of these employees asserted, they preferred to remain silent about the wrongdoing, believing it was a better option for the preservation of their jobs.

*okay, no, we're gonna do something, nothing will happen. What if we do this, you know, why I should make put myself in the situation, put myself into problems, let them do whatever they want to do ... (senior associate of internal audit in a Big-4 audit firm under the QFC)*

Even if the firm's administration mentioned protection in the policy of whistleblowing and encouraged people to report wrongdoing, reporter of wrongdoing will be affected and damaged. To some of the participant it is a deceptive reporting encouragement.

*... so no, they think they need to mention protect but as I told you to make people feel good about or make people feel like safe or make people feel like yeah, we can do this they need to make them go through real life case. real life cases it's gonna encourage people to take take a step and and*

*blow the whistle or like say something take an action when it's they need to you know... (senior associate of internal audit in a Big-4 audit firm under the QFC)*

Thus, reporting will increase the probability of exposure around the company and the whistleblower will be known to other people and other organisations. Thus, whistleblowing is claimed to be a career demolisher to some people or from some participant perspectives.

*They lose their job, you know, we would clearly lose their job. This is what I think that would happen. Plus, maybe kicked out of the country, maybe? Yeah. Yeah. kicked out of the country... Think his history will be on everyone. And everyone will know about his story. And I don't think they would hire him. (senior associate of internal audit in a Big-4 audit firm under the QFC)*

Internal Audit Manager in a Big-4 audit firm, under the QFC authority reveals a critical emotional barrier to whistleblowing – fear. Fear of retaliation, professional harm, or even personal damage, constitutes a significant deterrent for potential whistleblowers. He further outlines a particular concern regarding the potential misuse of sensitive information within the organisational hierarchy:

*...if there is like whistleblowing issues, most of the times most people, they don't really feel confident, comfortable reporting it, because they feel it might fire back at them, which sort of impairs the concept of the whistleblowing... and even if it is clear, again, people are threatened by the idea if I report to somebody from the senior management, they might communicate internally, it might come and then bite me in fire back.*

Organisations must implement effective measures to assuage these fears, providing assurances that whistleblowers will be protected from any form of retaliation. A strong support system, coupled with a culture that encourages open communication, can contribute significantly to assuaging such fears. The concern highlights the necessity for a trusted, independent, and confidential channel through which employees can voice their concerns. An impartial entity, detached from the company's internal hierarchy, can effectively address these concerns.

So, anonymity was not guaranteed at all, and it seemed the word guaranteed was not even mentioned in the policy as a protection mechanism internally and within the firms' administration. Moreover, whistleblowing could turn into a "revenge" war between the reporter and the wrongdoer as the whistleblower will be known after reporting an incident internally.

*... person who complained about him is still in his job. And this rarely happens 5%. If you are in a workplace and you complained, the person complained against must know about the matter that the complaint has occurred. He will teach. As nature, we are not robots, nor are we by nature as tolerant and peaceful human beings. When someone complains about you, either you withdraw or take revenge. (Assistant Manager of Internal Audit in a Big-4, QFC-authorized firm)*

Thus, reporting against someone in the company specifically a person on the top of the hierarchy or a figure in the company will fire back at the reporter. However, a whistleblower can avoid this situation by making the whistleblowing as an exit strategy.

*The idea is that I was out of the place and so there is no risk of revenge... I quit, especially when I secured my new job. Returning to previous work is almost impossible, and the return rate does not exceed 1%. (Assistant Manager of Internal Audit in a Big-4, QFC-authorized firm)*

Thus, if one blows the whistle, he/she should resign after that given that there was no protection mechanisms and anonymity was not guaranteed.

*... there are two options: either he resigns or report the incident and the whistle blows... (Assistant Manager of Internal Audit in a Big-4, QFC-authorized firm)*

The two-phased approach in whistleblowing reporting is important to guarantee the protection of the individual initiating the report, a sentiment echoed by an Internal Audit Manager at a leading audit firm under the jurisdiction of the Qatar Financial Centre Regulatory Authority (QFCRA). The process is bifurcated into two distinct stages, each with its particular ramifications.

The first stage materialises when the reporter is sufficiently confident and secure to lodge a complaint 'internally' within their own company. Upon successful execution of this stage, the whistleblowing process within the organisation's confines is considered complete.

However, the pathway becomes more complex if the reporter lacks trust in their company to handle their claim with the requisite professionalism and discretion. In this scenario, the reporter ascends to the second stage of whistleblowing. Here, they bring the matter 'externally' to the attention of the regulators at the QFCRA. This step serves as an alternative, albeit more public, platform for individuals to voice their concerns while retaining their confidence in the system's efficacy and their safety. But, external reporting may affect the organisation's reputation as the compliance officer at an authorised bank noted:

*I stress on the good intention to report so we can refer to this form that the comprises information about the one who is whistleblowing and the other third party who is conducting a misconduct or illegal act within the organisation and all the details and what is the nature of the misconduct and how the whistleblower procedures as a as an illegal act that harm the reputation and the image of the organisation.*

The above analysis highlights the multifaceted challenges faced by whistleblowers and illustrates the need for holistic approaches in developing effective whistleblowing mechanisms. From policy transparency and communication channels to cultural shifts and rigorous protections, addressing these issues can foster a safer, more open environment for potential whistleblowers.

#### 6.5.1.3 Anonymity was not guaranteed

The prevailing culture and social environment discourage employees from raising a complaint. This stems from an underlying belief that the whistleblower, after stepping forward, will inevitably be exposed at some point. The societal norms implicitly encourage a silent compliance rather than voicing concerns, engendering a climate of apprehension around reporting any misconduct. The fear of retaliation or exposure creates a significant deterrent, making whistleblowing a perilous endeavour for those willing to take the risk.

*I mean, practice the policy. This is what should happen. But with all honesty, frankly speaking, I don't think I'm going to do that or I don't think they will do that, you know, the environment. (Senior associate of internal audit in a Big-4 audit firm under the QFC)*

The concept of anonymity, considered to be a cornerstone in the whistleblowing process, is often called into question, as a senior associate of internal audit in one of the Big-4 audit firms operating under the Qatar Financial Centre (QFC) has pointed out. In an ideal scenario, anonymity would be handled with the utmost confidentiality. Yet, in Qatar's case, it seems that such anonymity may eventually be compromised at some stage during the investigation. Consequently, certain participants have proposed that reporting channels should be accessible exclusively to specific individuals within the organisation, firmly insisting that these communication avenues must not be open to any outside access.

*... oh, basically, the reporting channels will not be open for public it should be reported for specific people, right. It should be within the intranet of the company. They want to they are looking to receive suspicious things or whistleblowing... (Partner in a Big-4 audit firm under the QFC)*

In addition to the internal channel, an additional external channel is required if things went serious with the case that has been reported, Thus, an extra protection hotline is favourable for whistleblowers as suggested by a senior associate of internal audit in a Big-4 audit firm under the QFC:

*or like international line also that we supposed to call in case of any unusual action*

A partner in a Big-4 audit firm under the QFC suggested the same, he stated:

*They want to they are looking to receive suspicious things or whistleblowing from outside that there should be another reporting channel.*

Despite the presence of both internal and external reporting avenues, the assurance of anonymity still remains uncertain, as emphasised by the Compliance Officer in a bank authorised by the Qatar Financial Centre. This uncertainty persists regardless of whether the entity administering the process is the firm itself or an external party:

*It's mostly non-anonymous. However, if, for example, there's the hotline which is head office, but for example, internally here, we we did a mechanism whereby they do this internal whistleblowing. Usually, it's usually not anonymous, but if for example, they call head office, or there's a certain line Yes, it can be it can be non-anonymous. Of course, in a nutshell, we encourage people to to mention their names and to mention their vocations, when they are doing that with siblings. However, if they choose that, this is if they choose to do it anonymously, there are ways to do it anonymously. And if they also choose their identity not to be revealed, of course, the bank will try their best not to expose the identities of such people unless as I mentioned earlier, in certain points in the investigation, the identities might be revealed, they might be summoned as witnesses for.*

Also, the regulatory body that monitor the external channel indicated the same that anonymity was not guaranteed:

*... in practice, I think it's almost impossible to guarantee that. Okay, things happen, that potentially outside of the QFCRA control or the protective reporter's control. So I think it'd be wrong to say that there's any kind of guarantee of anonymity. I think the overall approach is the as much as as possible on the best endeavours basis, the QFCRA should to everything possible for maintaining confidentiality. However, the there is a transfer of possibility that confidentiality, breached and then I mean, we haven't had that, that those that situation yet... (The policy director at the QFCRA)*

The framework not only lacks clear stipulations around maintaining confidentiality and anonymity, but also fails to offer direction should an incident arise where these crucial principles are breached. In essence, should a violation of anonymity and confidentiality occur, there is a conspicuous absence of procedural guidance to navigate such an eventuality.

*... I mean, that would be a difficult situation. So yeah, I mean, there's certainly nothing in legislation in our rulebook that deals with that scenario. I guess it would be a matter between the protective reporter and whoever received the the protection report to deal with that between themselves. I'm not going to speculate how that would that would that would play out. (The policy director at the QFCRA)*

The above highlights an evident gap in the legislative framework and internal regulations to address the situation. It signifies a lack of preparedness or pre-established guidelines to handle this situation, highlighting a critical deficiency that may need to be addressed. This suggests that in the absence of clear guidelines, the onus falls on the reporter and the recipient to find a resolution, which could introduce a degree of subjectivity and inconsistency into the process. The ambiguity also may deter potential whistleblowers, who could fear the unpredictability of the outcome.

In addition, the repetition of the phrase “that would” communicates apprehension and uncertainty about the potential outcomes. It reemphasises the lack of a clear, codified process for this scenario and indicates the need for more robust guidelines in the whistleblowing framework. By establishing a transparent and consistent approach, trust and confidence in the whistleblowing process can be significantly enhanced.

#### 6.5.1.4 Protection resources

Extra measurements should be taken to ensure confidentiality and protection to whistleblowers. Whistleblowers have the right to remain confidential via the amount of information they give. They can choose to remain hidden, unknown, and nothing to be mentioned about them at all stages, prior to the investigation, during the investigation and after the investigation.

*... hide the names and contact number ensure safety. Yeah, this is that that's it? Yeah, it's it's mainly make sure that whistleblower will be will be always unknown unless until this case, okay, one of the good until the case is closed. (senior associate of internal audit in a Big-4 audit firm under the QFC)*

Companies utilise an range of reporting mechanisms and methodologies. Certain enterprises rely on electronic mail addresses to receive reports of any allegations, providing a digital line of communication that ensures speed and convenience. Alternatively, some businesses prefer receiving written messages delivered to a secure postal address, preserving a more traditional approach. In addition, various organisations have established confidential hotlines specifically to receive reports of allegations. This range of options serves to provide accessibility, security, and confidence for potential whistleblowers, as attested by the management team of a bank authorised by the QFC.

*They are allowed to do so in person or in telephone, or in writing. So they raise these concerns different people, different competent authorities and individuals including the Human Resources manager, the compliance officer and the chief executive officer on a group level as well as the head of human resources of the group and head of internal audit of the group, there's a hotline as well... (The HR manager)*

Revealing the whistleblower's identity to key individuals could create a safety net for the whistleblower. These individuals could include those in leadership positions such as the CEO, Head of Compliance, Head of HR, and the Head of Internal Audit. These figures are in a position of power and authority and can provide protection for the whistleblower during the reporting process.

*... Yes, because if he reveals his identity, he will reveal to the concerned Individuals... the head of compliance in HR or CEO or at the head of the group compliance or head of the group internal auditor is going to conduct the investigation and the head of HR, this will be the backbone for him, they will protect him, other than that nobody will know about this action... the hotline is only restricted to... (The Compliance Officer)*

Further analysis reveals a degree of anonymity maintained throughout the process. The Compliance Officer suggests that, barring those directly involved, no one else will have knowledge of the whistleblower's

identity or actions. This speaks to the essential confidentiality measures inherent in the whistleblowing process, assuring the whistleblower of protection beyond the immediate safety net.

Undoubtedly, safeguarding channels exist for whistleblowers, aimed at fostering greater confidence and assurance in their ability to report without fear of their identities being exposed. These mechanisms serve to engender trust, a cornerstone of any effective whistleblowing procedure.

Nonetheless, during the investigative phase, the company may find it necessary to request the whistleblower to disclose their identity, treating them as a key witness to the reported wrongdoing. It's important to note that such a step should not be taken lightly, as it may potentially challenge the trust established between the reporting party and the company.

In circumstances where the identity disclosure becomes inevitable, the company bears the responsibility of extending its support to the whistleblower. It is essential that the organisation provides all possible assistance, considering the potential risks and backlash the whistleblower might face. Such a supportive stance demonstrates the company's commitment to ensuring a safe and fair environment, a fundamental pillar of corporate integrity.

*So the employee may be asked to come forward as witness. Okay. Yes, if the employee agrees to do this, he will be offered advice and support... (The Compliance Officer in a QFC-authorized bank)*

Should a situation arise necessitating a whistleblower to disclose their identity to the organisation, it is the important duty of the company to extend robust protection to this individual. The firm must take every measure to safeguard the whistleblower from any retaliatory or damaging repercussions as a result of their action in reporting a malfeasance.

If the whistleblower's identity is indeed revealed internally, it becomes the organisation's absolute responsibility to avoid any actions that could negatively impact the whistleblower. This includes, but is not limited to, refraining from salary reductions or demotions.

As highlighted by the Compliance Officer in a QFC-authorized bank, an effective reward system forms a crucial part of a well-devised whistleblowing policy. If the act of whistleblowing stems from goodwill and assists the entity in circumventing a potential damage to its reputation, the company should seriously consider acknowledging and rewarding this act of moral courage. Such recognition could take various forms – a promotion, a special bonus, a raise, or even a unique allowance.

Indeed, by putting in place a system of incentives and rewards for those brave enough to report allegations, the organisation actively fosters a culture of ethical conduct and accountability. This not only encourages individuals to report improper actions but also reinforces the company's commitment to integrity and transparency. A senior associate of internal audit in a Big-4 audit firm under the QFC elucidated:

*... rewards should be a reward for people who whistle blow or like, you know, what I mean? Like, if they expose a case, if they exposed the case that will protect the company reputation, protect their jobs, you know, this is one of the things that that may like also encourage people to practice the policy.*

In situations where a whistleblower has reservations about the integrity of their own organisation, or lacks confidence in its response mechanisms, they can escalate their concerns to regulatory authorities. This escalation marks a transition into a 'Stage Two' process, designed to offer greater security and safety for the whistleblower.

This secondary stage is managed electronically, utilising a system administered specifically for this purpose. This method serves to streamline the process while ensuring that all necessary safety protocols



and confidentiality requirements are precisely observed. It is necessary that individuals feel they have a secure avenue for reporting, outside of their immediate organisation if necessary, to reinforce trust and promote a culture of ethical transparency.

*we have three channels here through What's web portal, and you will notice we have, we have that an QFCRA website, e-form, we call it through email, we have what's a little like separate email, separate from cdrs, and enforcement email that deals with all referrals, and throw a letter, like via post. Management of protected reporting, how we can like, as a team, how we can like manage all the predictive reporting, for reference. First of all, once we receive that, either via e-form or email, and even the letters, we should acknowledge it regulatory authority, like will acknowledge all the reports. But sometimes, like if it's through e-form, and if it's anonymous, we cannot like go back and confirm or acknowledge, but the protected reporter will receive an automatic message from the system... (The Associate Director at the QFCRA enforcement department)*

The above showcases the accessibility of the whistleblowing process. The organisation provides multiple channels: a web portal, an e-form on the QFCRA website, separate email addresses for different purposes, and even traditional post. This diversified approach not only accommodates various preferences and needs of potential whistleblowers but also signifies an open-door policy, emphasising the organisation's willingness to receive and investigate reports. In addition, it emphasises the collective effort in managing and dealing with whistleblowing reports. The use of 'we' and 'team' indicates a cooperative effort and shows that handling these reports is not the responsibility of a single individual, which enhances the credibility and transparency of the process.

Acknowledgement of receipt is a crucial step, as it provides reassurance to the whistleblower that their concern has been registered and will be addressed. The Associate Director at the QFCRA enforcement department highlights a critical aspect of the process: the treatment of anonymous reports. It is essential that anonymous whistleblowers also receive confirmation that their report has been received, even if it is an automated response.

To wrap it up, protection resources refer to the various measures, procedures, and support systems put in place to ensure the safety and confidentiality of whistleblowers. These are crucial in fostering an environment of trust where individuals feel safe to report misconduct without fear of retaliation. In this context, there are several key protection resources highlighted. First, multiple reporting channels: by providing various means such as a web portal, an e-form on the QFCRA website, separate email addresses, and traditional post, the organisation offers whistleblowers flexibility in choosing a medium they feel most secure and comfortable using. Second, anonymity: the organisation accepts anonymous reports, allowing whistleblowers who fear possible repercussions to keep their identity hidden. This promotes a sense of security for potential whistleblowers. Third, acknowledgement of receipt: regardless of the reporting medium used, the organisation makes a point to acknowledge all received reports, even for anonymous ones via an automatic system response. This acknowledgment serves as an assurance that their report is being taken seriously and will be acted upon, reinforcing a sense of protection. Lastly, collaborative management: the use of a team-based approach in managing whistleblowing reports reduces the likelihood of bias and enhances transparency and fairness. This can also serve as a form of protection for whistleblowers, as it assures them that their reports will not be overlooked or suppressed by a single individual with possible vested interests. Together, these resources form a robust protection framework for whistleblowers, crucial for maintaining organisational trust and ensuring accountability.

While the protection resources discussed offer a considerable degree of safety for whistleblowers, there are certain challenges and limitations that can impede their effectiveness. Highlighted in this section are a few struggles. First, anonymity assurance: even though the option to report anonymously is provided, the system's design may not completely safeguard the whistleblower's identity. Technological limitations, data breaches, or even unintentional disclosure could potentially compromise anonymity. Second, confirmation

to anonymous reporters: the system automatically acknowledges the receipt of every report. However, for anonymous reports made through the e-form, there is no way to follow up or provide further communication to the whistleblower. This can potentially hinder the investigation process, especially when further clarification or information is required. Third, reliance on electronic channels: the organisation heavily relies on electronic channels (web portal, email, e-forms) for reporting. This could be a limitation for individuals who are not technologically skilful. Fourth, handling volume of reports: as the number of channels increases, so does the potential for an influx of reports. Managing a large volume of reports can be challenging and could potentially delay the response time and comprehensiveness of investigations. Last, consistency across multiple channels: maintaining consistency in response and investigation across multiple channels can be a struggle. There might be discrepancies in how reports are managed depending on the channel used, which might affect the perceived fairness and transparency of the process. Addressing these struggles requires careful consideration and a balanced approach to ensuring both the safety of the whistleblower and the effectiveness of the reporting and investigative processes.

### 6.5.2 Investigation process and struggles

The whistleblowing investigation procedure encompasses various integral elements, including resource allocation, logistical arrangements, the function of the internal audit, the availability of conclusive evidence, and the ultimate outcome of the investigation. A comparison between the envisioned model, as set out in the written whistleblowing policy, and the reality on the ground revealed a stark discrepancy. Instead of the smooth, efficient process outlined in the policy document, the actual investigation protocol struggled with a myriad of obstacles that impeded its effectiveness. The complexities of the real-world environment presented considerable challenges, emphasising the necessity for constant re-evaluation and adaptation of the policy to address these inevitable hurdles. Figure 12 illustrates the struggles in the investigation process.

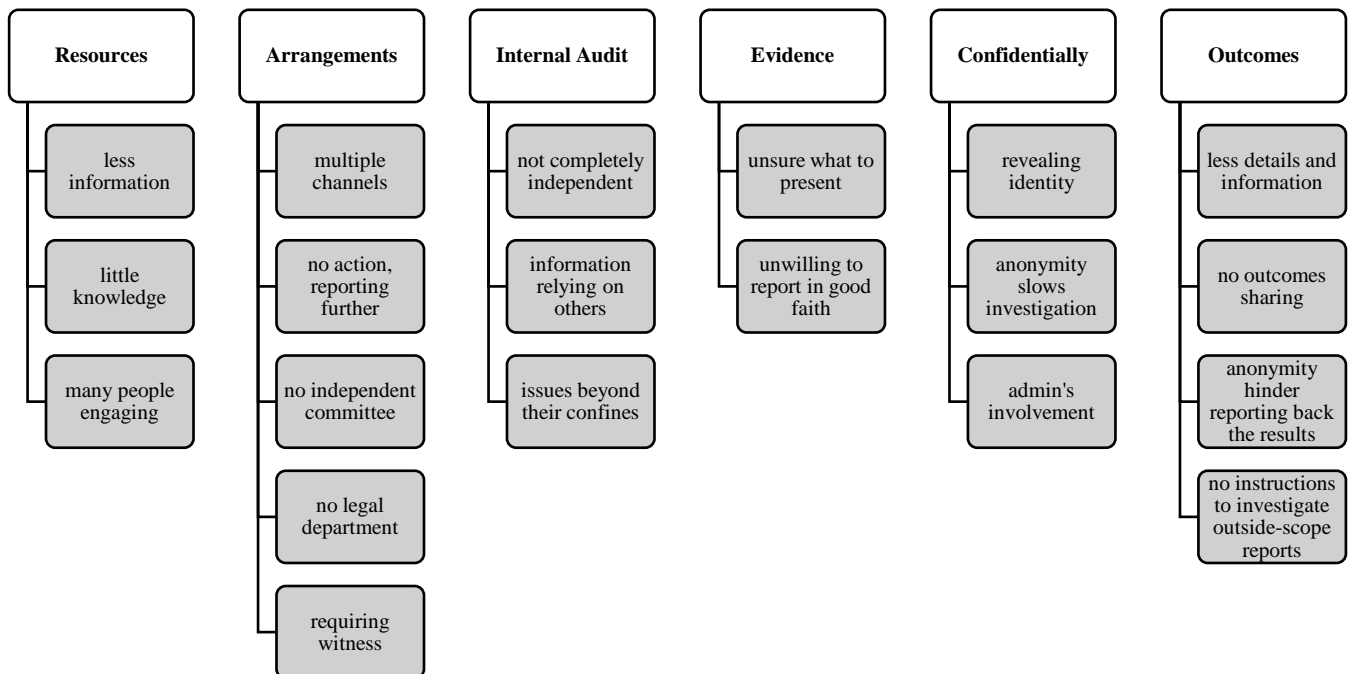


Figure 12: the struggles in the investigation process

The investigation's resources faced challenges that inhibited its performance. These difficulties were [1] because as the level of confidentiality increases, the amount of information required for investigation decreases. [2] The investigation committee has little knowledge of the operational aspects of the departments involved in the allegation. [3] There are many people involved in the investigation, which increases the risk of the whistleblower's identity being revealed and complicates the investigation itself. To improve its ability to perform, it was suggested that [1] use advanced technology of encrypted channel to help ensure secure and continuous mutual communication between the whistleblower and the investigators. [2] To form an anonymous investigation committee comprised of three key players: the compliance officer, the chief executive officer, and the human resources officer. [3] The internal control to continuously test the investigation process's effectiveness.

The reporter has several options for raising his concerns as part of the investigation arrangements. However, there were some difficulties that hindered the investigation's performance. [1] The availability of multiple communication channels may jeopardise the confidentiality of the case. [2] When no action is taken, the reporter reports to a another department. This will make the case known to many people throughout the organisation, and the whistleblower's identity may be revealed or the investigation may be limited. [3] There is no presence of an independent party or committee to investigate. [4] Depending on the entity or sector, the investigation process varies. Furthermore, not every company has a legal department that receives whistleblowing reports and conducts investigations when appropriate and reliable. [5] In that case, the whistleblower may be required to make a statement or testify. The whistleblower's identity is revealed, and the case's security is jeopardised.

Internal audit is essential for implementing and monitoring the whistleblowing policy and procedures. Internal audit has three primary roles in the investigation process: [1] *initiator* of policy and procedures, including investigation, [2] *moderator* of investigations, and [3] *assessor* of whistleblowing policy and investigation implementation. However, the internal audit encountered some difficulties that prevented it from carrying out the investigation. The difficulties were as follows: [1] the internal audit department was not completely independent of management, resulting in conflicts of interest; and [2] the internal audit is reliant on the department's report on the delivery of whistleblowing policies to employees. Internal audit should either supervise or attend the training course to ensure the accuracy of the department report. Furthermore, [3] the role of internal audit is restricted. Although the internal audit team is responsible for policy and procedures, as well as modifying and assessing some technical issues in some departments, all of these are related to the control mechanisms that underpin internal control duties. However, if the allegations go beyond their confines, the situation should be handled by an intervening body.

The investigation process is credible when the following steps are taken: [1] ensure that correct and relevant information is received, [2] refer the case to relevant parties, and [3] communicate and document the investigation results to the appropriate parties. As a result, the evidence is the most important step in establishing the credibility of the investigation. The evidence is thus the most important step in establishing the credibility of the investigation. The investigation process was hindered by the fact that [1] many employees were unsure of what to present as evidence for their whistleblowing report. Furthermore, [2] staff were unwilling to report an allegation in good faith without evidence.

All allegations will be treated confidentially, according to the policy and procedures, and all necessary steps will be taken to avoid revealing the whistleblower's identity. However, because of a lack of information or the need for additional clarification, the investigation met struggles. [1] The identity of the suspect may be revealed at some point during the investigation, and protection is not guaranteed due to people's cultures and mentalities. [2] If the whistleblower wishes to remain anonymous, the investigation may be slowed or even stopped due to a lack of information. [3] The investigation may be hindered by management's involvement in the investigation. If management follows the role and applies the policy and procedures to all people, regardless of position, the investigation results will be more accurate and effective, and appropriate actions will be taken based on the findings.

Then, the investigation findings are communicated to the whistleblower after a comprehensive data collection and inquiry process. However, the report lacks in-depth details, creating vagueness and uncertainty about the investigation. The policy's lack of transparency and struggles with anonymity and framework limitations can diminish trust in the whistleblowing system. Participants highlight challenges in understanding the reporting process and where to report specific allegations. The uncertainty in investigation outcomes, high anonymity hindering effective communication, and limitations in addressing diverse circumstances contribute to a sense of distrust. To enhance trust, greater transparency, balanced anonymity, and expanded policy scope are essential.

#### 6.5.2.1 Investigation resources

A multitude of proposed channels for reporting was presented, yet these options were often unclear and wrought with uncertainty for potential whistleblowers. A formalised procedure for lodging complaints did exist, necessitating the completion of various steps. Nevertheless, the risk of unmasking the whistleblower was a constant threat, either in the early stages or amid the investigative process.

The act of disclosing allegations and improper conduct invariably carried a risk of exposure throughout the whistleblowing process. This presented a significant deterrent to those contemplating raising the alarm on wrongdoings. Despite these challenges, certain participants put forward suggestions to encourage the safeguarding of whistleblowers.

Among these recommendations, some proposed the establishment of an encrypted channel. This would serve to maintain secure and uninterrupted communication between the whistleblower and the authorised individuals during the course of the investigation. Such a measure could prove vital in enhancing trust, promoting more disclosures, and ensuring that organisational misconduct is appropriately addressed.

*I believe technology would solve the problem. technology would solve the problem for example... something could be developed to or like an app or something. (Senior associate of internal audit in a Big-4 audit firm under the QFC)*

In order to guarantee the validity of the information exchanged between the whistleblower and the recipient of the report, it is crucial that a mechanism is in place for the reporter to receive feedback on the lodged allegation. Moreover, it is necessary for organisations to create an anonymous committee specifically tasked with receiving and handling such reports. This measure is not just for processing allegations, but also serves the vital purpose of safeguarding the identity of the whistleblower. The establishment of such a committee fosters trust and promotes transparency while ensuring the anonymity of those courageous enough to expose misconduct. This can significantly contribute to maintaining a company's ethical integrity.

*We need to make sure that this information are reliable... So what I think is what I think there should be like an a committee that to choose a committee from x company and from the, for example, in my company to make to make a call committee, this committee at known charter, these people should be unknown. (Senior associate of internal audit in a Big-4 audit firm under the QFC)*

The Associate Director, Investment Manager, Advisor and Securities Supervision at the QFCRA highlighted the investigation resources:

*I'll talk mainly from my department's perspective is when we receive a whistleblowing it comes usually from the whistleblowing team, what we do is there's a process that we meet with the whistleblowing team to go through the report... we investigate from our side. So we usually do that. So risk assessment visit and we do it on a regular basis, like annually, or it depends actually on the risk of the firm, or we conduct some sort of symmetric review, just to go through these allegations.*

*And to make sure that it's if it is under our remit, then the process that goes is we go through the reviews. And if there is actually a breach that's the whistleblowing was right, then the action that we'll take, it's either we take it to our enforcement team as a breach...*

Following from the above, it is evident that a clearly structured process exists within the organisation for handling whistleblowing cases, and several key investigation resources are utilised throughout this process. Initially, the whistleblowing team serves as the primary point of contact when a report of potential misconduct is received. This team is responsible for documenting the details shared by the whistleblower and acts as an essential hub for these allegations.

Additionally, the Associate Director, Investment Manager, Advisor and Securities Supervision at the QFCRA references their own department's involvement, suggesting that a collaborative approach is taken, with other departments working in cycle with the whistleblowing team. These departments contribute to the process by conducting independent assessments and investigations, thereby ensuring multiple perspectives are considered.

Furthermore, it is highlighted that regular risk assessments and reviews are integral parts of the investigation resources. These assessments are carried out periodically, often annually, or more frequently depending on the specific risk profile of the firm. Such measures serve a dual purpose – not only aiding in the investigation of current allegations, but also acting as a preventative tool to decrease the likelihood of misconduct in the future.

The enforcement team is mentioned as a vital resource. This team is called upon when a breach is confirmed, undertaking necessary actions in response to verified allegations. Their role is crucial in maintaining compliance with both internal organisational regulations and external statutory requirements. Overall, these investigation resources collectively ensure that a robust and effective whistleblowing process is in place.

The credibility of the information supplied is integral to the effectiveness of the investigation process. If it emerges that the information is misleading or if the reporter is discovered to have malicious intent, appropriate action will be initiated against them. This emphasises the seriousness of the process and the commitment to upholding fairness and integrity within the organisation. The Compliance Officer in a QFC-authorized bank noted:

*They have to investigate. They have to investigate if his concern initiated from a goodwill or not. If he raised a concern and he has a bad intention, a disciplinary action will be taken against him against the whistleblower because he had the bad intention.*

Even if the identities of the committee members remain concealed, the risk of a whistleblower's exposure persists, and this method may not be deemed entirely suitable. In essence, after initiating a whistleblowing action, the reporter's identity could be revealed at some stage of the process. The process of reporting an allegation involves a sequence of steps that must be dutifully completed by the reporter. According to participants from the regulatory body, the whistleblower should direct their report to three primary stakeholders.

*... there are certain people okay that you should report for example, the head of compliance, one of the persons that you should contact the chief executive officer and the head of the human resources okay... (The Compliance Officer in a QFC-authorized bank)*

The three primary stakeholders may be contacted using a variety of reporting mechanisms, which could be executed in person, in writing or telephonically. However, the latter may not offer adequate security as calls may be recorded, thereby risking the exposure of the whistleblower's identity. These three reporting methods were deemed somewhat precarious as each could potentially reveal the whistleblower's identity

to unauthorised individuals or those not directly related to the matter. In other words, these approaches could unintentionally, or intentionally, channel the report to someone irrelevant to the concern. Consequently, it is essential that such communication channels are subjected to rigorous monitoring. The Compliance Officer in a QFC-authorised bank noted:

*...you have to achieve these persons, either in person or in writing or through telephone call, which the really writing I really preferred because it is a complete document to be taken as a future reference for any communication. All these people that I mentioned, the head of compliance head of HR, and these all should be contacted by the whistleblower...*

Whilst concerns about a whistleblower's safety are important, enhancing their security measures may halt the investigative process, as it could result in a shortfall of essential information for both the compliance and investigative teams. As indicated to earlier, as a report wends its way through the stages of the reporting process, there tends to be a decreasing supply of information conveyed to the receiving party.

In instances where a whistleblower mistrusts towards their organisation and lacks faith in them, they may bypass internal avenues and submit their report directly to an external regulatory authority. This step forms the second phase of the reporting process. Therefore, the primary aim of these reporting techniques is to gather a more substantial body of information from the whistleblower, facilitating the responsible department's capacity to address the issue effectively. The Compliance Officer in a QFC-authorised bank clarified:

*...the whistleblower should document What's his concern? He should have the goodwill when he is whistleblowing... What's the nature of the call it is a fraud? It is a breach against the organisation policy? Is it related to corruption? Is it manipulation and accounting records? Is it a breach of the rules and regulations of the RA? So what's the context? Okay, what's the nature of concern of this whistleblower do is doing misconducts which department the X department or the Y department the X individual or the Y individual? So we will approach these okay individuals okay and communicate with them preferably in writing okay. And after this communication, okay, these individuals should come in okay. Should okay study the concern? There should be an investigation team which can be the compliance is such the internal audit to investigate about the case okay. There may be more questions to be addressed with the whistleblower, but all this will be discretely we have to give the comfort of the whistleblower that is protected that is supported okay...*

As noted earlier, there exist three dedicated departments or committees that receive and respond to whistleblower complaints. In the event that the initial party fails to acknowledge or act upon the issue at hand, the whistleblower then escalates their concerns to the second party. This step, however, inherently amplifies the risk of exposure. The cumulative awareness of the issue, with numerous individuals cognisant of the allegations, invariably widens the window for potential disclosure of the whistleblower's identity. The Compliance Officer in a QFC-authorised bank noted:

*His question is not being heard. By these concerned individuals. We have a hotline directly with the human resources department and with the group, internal audit department these Okay are the two concerned departments that handle the concerns or the request initiated by the whistleblower and also an investigation will be taking place at the head office level by the internal audit group internal audit and the group compliance and the HR the same procedure it will be dealt confidentiality, there may be more questions addressed to the whistleblower to assure him always that he is protected, he is supported and the results will be communicated to him discretely.*

The key to a successful investigation was, once again, information reliability and availability; the more information available, the more efficient the investigation. The Compliance Officer in a QFC-authorized bank gave an example:

*...the investigation process, you may need certain records. If there is a fraud, for example, or manipulation in the accounting records. For example, you may request a customer setup account or a general ledger and just giving an example I know that you are an accounting professor and for example, you you look into the Statement of Account of a certain ledger or trial balance or financial statements or an advice or anything you're made of perfectly certain statistical data you may require from the IT to to generate a certain report without telling him what's the purpose of this investigation. Yes, so as much as relevant documents already as much as relevant information is ready this will facilitate the investigator in the investigation process and will result in satisfactory results or satisfactory reports.*

There were some steps to be taken during the investigation process to protect the investigation's confidentiality and the whistleblower's security, as claimed by the HR manager in a QFC-authorized bank. However, depending on the nature of the misconduct, some measurements of the investigation process may be a source of concern for the whistleblower or even jeopardise confidentiality.

*whether this investigation is to be made or not, you know, so, it's it has to be decided based on the gravity of the matter and also we know what form it will take, right. So, of course, the investigation will be held with confidentiality. And whenever possible, the whistleblower will be informed certain cases require suspension from work, you know, certain people who are involved might be suspended from work in order to finalise these investigations, that usually the investigations are done, if this it reaches this level, and sometimes it has reached this level, it's usually done by our group internal audit, the group compliance or the head of Human Resources. Of course, they will they will gather all the data or the sometimes IT are involved, you know, so, it all depends on the type of the misconduct or the crime or the fraud or whatever is going on.*

Rigorous additional precautions, although implemented with good intent, could unintentionally unmask the whistleblower, thereby placing the investigation at risk. Consequently, an independent body is recommended to oversee all aspects related to whistleblowing. This institutional body's mandate should incorporate this vital role, potentially enhancing the confidentiality and security of the investigative process.

However, an inherent drawback of such an independent committee could be their limited knowledge of the specific nature of the misconduct, or the individuals implicated, particularly where certain illicit acts demand an understanding of the company's operational complexities. Furthermore, resolution of some issues may require access to proprietary documents that are classified and integral to the company. The framework should, therefore, also consider these complexities to strike a balance between protecting the whistleblower and enabling an effective investigation.

As the regulators shared the framework that all companies should follow, it is up to the firm to modify and craft its own whistleblowing policy and procedures. However, the majority of the companies did not take that step seriously, as some of the participants previously stated that they were unaware of the policy and how to report an allegation.

In certain organisations, the submission of a report would lead to one of two possible channels: the president's office or the internal audit committee. Supposing a complaint lands on one's desk, the other takes up the investigation. However, these bodies lack the authority to pursue further steps in the investigation process. Consequently, regardless of their perceived independence, a in-depth investigation may fail to materialise.

In the event that a complaint poses a potential risk to the organisation's interests, the president may choose to intervene, creating a conflict of interest. Thus, the effectiveness and independence of such investigations are less than what they purport to be.

Moreover, there is a possibility that complaints may be directed at the president's office itself. In such situations, the individual who raises the alarm could face detrimental consequences, including harm to their career, as previously indicated. This, unfortunately, is a reflection of the prevailing culture within the organisation.

*... Two internal auditing bodies in the institution, the president's office, the president's office. I do not mention the details of entering in the form of the complaint's details or receiving the violation, so that it guarantees that if there is a complaint against the president's office in this case, the internal audit will see it, even if there is a complaint against the internal audit in this case, the president's office will see it. Independent, not necessarily a decision-maker, but an independent party. It doesn't say HR; it doesn't say Finance. Not even the disciplinary committee, the compliance committee, not even the aid disbursement committee or the procurement committee. Click Internal Audit or the President's Office... (Assistant Manager of Internal Audit in a Big-4, QFC-authorized firm)*

Although the president's office may not be the best place to investigate a whistleblowing allegation, the internal audit committee, as claimed, may play an important role in governing reported cases of whistleblowing. Indeed, by doing so, they may be able to test the effectiveness of the whistleblowing policy and determine how to improve it.

*This is a very good thing; because the internal audit will help reveal the effectiveness and efficiency of the whistleblower policy and report it to the audit committee and members of the board of directors...the internal auditor may show that some procedures for whistleblowing do not comply with international standards and do not match the best practices. (Assistant Manager of Internal Audit in a Big-4, QFC-authorized firm)*

Despite having transparent policies and procedures, along with a commitment to handle allegations confidentially, the identity of certain individuals may become exposed at various stages during or even prior to the investigation. This risk is often increased when information is shared online, a platform where exposure is almost inevitable.

Indeed, some whistleblowing report forms necessitate the disclosure of the whistleblower's identity, with the assurance that it will remain both anonymous and secure. However, the moment such information is transmitted through technological channels or online platforms, it unintentionally runs the risk of exposure, thereby compromising the very promise of confidentiality that is vital to the process of whistleblowing.

*It indicates states clearly that when you do a whistleblowing, when you whistle blow, you might be required to conduct a meeting to discuss such and such... Now every all of the channels has to be online has to be formal applications stating your email setting your address, you cannot submit unless you do this, even our company or the companies I worked with, like my clients, it has to be stated clearly your identity will be kept anonymous, but we know we know. Exactly we know it's gonna be you. You might be required to for a meeting and etc... (Internal Audit Manager in a Big-4 audit firm under the QFC authority)*

It was noted that various bodies were involved in the investigation and whistleblowing cases. Those were agents from outside the organisation. It was a good thing that those outside parties involved in the reported cases were able to render a material and objective judgement on a single case. The involvement of various



parties, on the other hand, may cause some issues for the company. In addition, the identity may be revealed once more.

*...the other thing I wanted to comment is that there's other agencies in the the QFC that often get involved when there's a whistleblower complaint, because they often come in the context of a broader employment dispute. So you may well have contacted the Employment Standards Office already heard of the QFCA the Qatar Financial Centre Authority, so that they, I think, would have a lot of experience in dealing with the context of whistleblower in the broad context of an ongoing employment dispute... (Associate Director of Anti-Money Laundering and Combating Financial Crime at the QFCRA supervision department)*

External parties were not the only ones who became involved; those who received the report and those who investigated the allegation were also involved. As a result, the involvement of various parties and people with diverse interests and backgrounds may complicate the investigation and cause additional difficulties for the whistleblower. As noted by the Associate Director of Anti-Money Laundering and Combating Financial Crime at the QFCRA supervision department:

*...supervisors aren't investigators. We've got we've got professional investigators on staff and they reside in the enforcement department. When we receive information generally from the enforcement department who run the whistleblowing scheme, we're given certain information and as supervisors we we do what we do as supervisors we we we engage with the firm, we gather information, we analyse that information. And if it appears, a breach has been revealed through that analysis and information gathering, we'll refer it back through our management processes. And if necessary, back to the enforcement department.*

Every participant within the regulatory body, as well as associated agencies that have roles in whistleblowing processes, focuses on distinct issues and allegations. Should a report come to their attention, a systematic procedure is in place, with a comprehensive checklist, employed to verify if the report has been correctly assigned. This process ensures the report is directed to those best equipped to evaluate and act upon the concerns raised. The Associate Director at the QFCRA enforcement department highlighted:

*Once he looked at the reference, once he submitted his concern, then we will determine whether if it's within the scope or out of the scope... When I say it's within the scope of should like meet all the requirements... it's either should be addressed to different entity in the States, or it should be like dealing with the under cdrs Customer Dispute Resolution Scheme.*

However, the act of redirecting a report to an alternative entity or department might present obstacles to the investigation, or worse, compromise the anonymity of the reporters. At the very least, it can cause multiple agencies to become aware of a particular issue within a certain company, possibly leading to future complications. Interestingly, to maintain a level of confidentiality, certain agencies or regulatory bodies have entrusted specific individuals with the task of receiving these reports, thereby ensuring restricted access. Senior Associate at the QFCRA enforcement department noted:

*... We have allocated members of the team that would be responsible for administering administering the protected reporting scheme. So not everyone within the team would have access to the file or the inputs or the submissions that the protected reporter has disclosed...*

Upon receipt of the reports, they undertake a rigorous evaluation and subsequently relay the findings to the pertinent party within the organisation to address the concern accordingly. The director of the QFCRA enforcement department exemplified:

*So we get a matter in truth whistleblowing line, and we accept it as a protected report, then we'll make a decision of who is the best party to address the issues being raised. So if, for example, there was a matter where the protected reporter was outlining some code of conduct issues as an employee, and he felt that his employment was not dealt with correctly, the appropriate party to deal with that would be the Employment Standards officer, we would refer the matter to the Employment Standards office and tell them we've we've received a protected report regarding this matter. They would look at and say yes, it's clearly under the ambit of of the Employment Standards office to look into these types of matters. They would then do what they do and tell us they've read they've addressed it. Now I do not we do not quality control. What other areas do. I'm not a specialist in the Employment Standards office, I rely upon them to do a job and once they've come back to us in the matter will be kept open until till they come back...*

Nonetheless, if the concern is directed to the inappropriate department, the whistleblower's identity may be revealed or the investigation may be hindered. If the matter was addressed to the relevant department, that department should be held accountable for responding in that manner, and if they return to the enforcement team claiming to have addressed the issue, the enforcement team should close that matter. This is yet another hindrance to the investigation process, as the reported cases lack credibility.

To wrap it up, trust and mistrust play vital roles in the context of investigation resources, particularly whistleblowing, as discussed in this section. When concerns or reports are misdirected, it potentially exposes the whistleblower's identity, compromising trust. Hence, companies need to establish clear channels of communication and report handling protocols, strengthening trust. Similarly, the involvement of multiple parties can complicate the investigation. Streamlining the process with defined roles and responsibilities fosters trust amongst parties involved, reassuring the whistleblower of efficient case handling.

However, this trust can be undermined if reported cases lack credibility. This not only hinders the investigation process but also weakens trust in the system. Implementing rigorous verification and validation processes helps restore trust. In the context of online whistleblowing, mistrust can arise from potential exposure of sensitive information. This necessitates robust digital security measures to protect identities and sensitive information, thereby fostering trust. Similarly, trust in technology is suggested in the proposal for automation and the use of specialised case management software to streamline workflow. Therefore, trust and mistrust are integral to the challenges faced by investigation resources, with the proposed solutions aiming to reinforce and preserve trust.

#### 6.5.2.2 Investigation arrangements

Whistleblowing necessitates a calculated sequence of steps, commencing with the individual reporting the misconduct or allegation. Primarily, this involves identifying and contacting appropriate individuals within the organisation. Once established, these contact points serve to redirect the issue to the specific department entangled in the alleged malpractice for further enquiry.

Assurances are provided that these channels of communication are secure, affording the reporter a variety of means to express their concerns. However, the existence of numerous channels may unintentionally risk the integrity of case confidentiality. The harsh reality is that all communication modes are potentially exposed to interruption, whether originating internally or externally.

Thus, it is important that these avenues are not only robustly secured but also carefully managed by individuals characterised by high moral and ethical standards. This safeguarding is crucial for the smooth execution of whistleblowing procedures and preserving the utmost confidentiality, a vital aspect of any whistleblowing process.

*there is a process one should follow when there is a whistleblowing. For example, if there is someone who wants to report a whistleblowing report, he has to go into certain processes to whom we should report First of all, there are certain people okay that you should report for example, the head of compliance, one of the persons that you should contact the chief executive officer and the head of the human resources okay. So, there is a certain perception, okay, there is a misconduct within the company, you have to achieve these persons, either in person or in writing or through telephone call, which the really writing I really preferred because it is a complete document to be taken as a future reference for any communication. All these people that I mentioned, the head of compliance head of HR, and these all should be contacted by the whistleblower. (The Compliance Officer in a QFC-authorized bank)*

Additional concerns have raised from the current investigative procedures, particularly when an issue or case remains unattended with no visible action taken. In such instances, reporters are compelled to escalate the issue to a another department, using a specially designated hotline created for this purpose.

However, this step has potential ramifications; it risks wider exposure of the case within the organisation, thereby potentially unveiling the whistleblower's identity or shrinking the scope of the investigation. This situation provokes critical queries: If the principal recipients of reports neglect to act, then who is qualified to deal with the issue? Are concerns raised against the three primary recipients justified, and why has the issue been overlooked?

These questions emphasise the urgent need to ensure all reported matters are appropriately addressed, protecting the integrity of both the investigation and the whistleblower's anonymity. Furthermore, the Compliance Officer of a QFC-authorized bank exemplified:

*If for example the whistleblower is not heard. Okay. His question is not being heard. By these concerned individuals. We have a hotline directly with the human resources department and with the group, internal audit department these Okay are the two concerned departments that handle the concerns or the request initiated by the whistleblower and also an investigation will be taking place at the head office level by the internal audit group internal audit and the group compliance and the HR the same procedure it will be dealt confidentiality, there may be more questions addressed to the whistleblower to assure him always that he is protected, he is supported and the results will be communicated to him discretely.*

The integrity of an investigation is fundamentally anchored in the principles of objectivity and independence when scrutinising the allegation. As such, the incorporation of an autonomous entity or committee, as alluded to previously, is vital to maintain the trustworthiness of the investigation. Independence in handling the issue is key to fostering credibility and faith in the investigative process, making certain that the allegations are examined through a lens devoid of bias and internal interference. It is this continuing commitment to unbiased evaluation that underpins the essence of a trustworthy investigation.

*Whether it is anonymous or not anonymous, it is credible when the investigation team is independent and objective when you conduct an investigation you should be always independent and you should be objective you should rely on certain facts on certain evidence in order to give your opinion and to give a result of the investigation. Any investigation that is not based on objectivity and independence will not be okay credible anymore. (The Compliance Officer in a QFC-authorized bank)*

The investigation process varies depending on the entity or sector. For example, public listed companies have legal departments that receive whistleblowing reports and conduct investigations when appropriate

and reliable. The audit committee oversees this office. The audit committee is in charge of keeping track of the investigation and the actions that have been taken. However, for credible results, it should be an independent committee or agency, as stated by an Assistant Manager of Internal Audit in a Big-4, QFC-authorized firm. Finally, the audit committee and the legal office will present their findings to the board of directors and the president's office.

The procedures for investigation can vary greatly, contingent on the specific sector or entity in question. Consider, for instance, publicly traded companies. These organisations typically house legal departments that serve as the first port of call for whistleblowing reports, proceeding with investigations as necessary when the reports prove substantive and credible. An audit committee, as part of their governance role, provides oversight to this function. This committee bears the responsibility for monitoring the investigation's progress and the consequent actions taken.

Yet, to ensure the authenticity of the results, there is an evident need for an autonomous committee or agency, as expressed by an Assistant Manager of Internal Audit in a distinguished Big-4, QFC-authorized firm. Upon completion, the final step in this process sees the audit committee alongside the legal department delivering their discovery to the board of directors and the office of the president. This final report, a conclusion of rigorous investigation, should provide an objective and independent perspective, thereby serving the interest of all stakeholders.

*...the Audit Committee is notified of the most important violations that have become, how they were dealt with, and who dealt with them, and whether there are still pending violations that have not been addressed. Of course, the phone number for reporting is available on the site and there is an electronic form to be filled out for reporting, and alerts are sent to both parties until the investigation procedures into the incident are started, and as an agency that has a system to sell the notification and when the receipt of the violation request is accepted, an alert arrives in the name of the person concerned with following up on the violation and conducting an investigation...*

In the course of an investigation, it may be deemed necessary for the whistleblower to provide a statement or contribute testimony, inevitably leading to a disclosure of their identity. This exposure undermines the security of the case and directly contradicts the assertions made by other participants that procedures are in place to protect anonymity. This incongruity was brought to light by an Internal Audit Manager working for a 'Big-4' audit firm, authorised by the QFC.

*That's why we even when I designed the policy and procedure, it has to be clear that it has to be through email, the email will be such and such, the identity will be kept anonymous, you might be called for a meeting to give a statement you might be even required to be held witness.*

The above points out the paradox at the heart of many whistleblowing policies: the promise of anonymity paired with the potential necessity for the whistleblower to make a statement or even testify, actions that would inherently reveal their identity.

Throughout our discussions, several significant struggles concerning investigation arrangements, especially those related to whistleblowing, have raised. Firstly, the struggle between anonymity and engagement can create an environment of distrust. Promises of anonymity are vital for whistleblowers, yet their involvement in the investigation can undermine this. Bureaucratic resistance also fosters distrust when concerns are dismissed, and whistleblowers must escalate issues, potentially revealing their identities. Digital whistleblowing platforms, despite their benefits, can unintentionally expose whistleblowers' identities, undermining the promise of anonymity. Lastly, when investigations are conducted internally, potential biases can lead to doubts about their credibility and fairness.

Overcoming these challenges requires fostering trust while effectively managing distrust. Clear whistleblowing policies, independent investigation committees, rigorous digital security measures, and open communication channels can help rebuild trust (Kaplan, Pope and Samuels, 2010; Lowry *et al.*, 2013), ensure the protection of whistleblowers, enhance the credibility of investigations, and ultimately encourage an environment of accountability and transparency.

### 6.5.2.3 Internal Audit and Whistleblowing

The integral role of internal audit in both implementing and monitoring whistleblowing policies and procedures is highlighted in our model (refer to Figure 13: The whistleblowing policy and procedures and the internal audit role model). Primarily, the internal audit team acts as the ‘initiator’ for these policies and procedures. After being initially crafted by regulators and put into effect by the company, these policies are precisely reviewed by internal audit. This team tailors its applicability, suggesting several contingency plans for each department to address potential allegations and matters of concern effectively. After these suggestions have been made, the board of directors, guided by the Compliance Officer of a QFC-authorized bank, provides their approval, indicating their agreement with the proposed approach.

*The internal audit looks into the policies and procedures of the entity among them the whistleblowing, because they look into it is one of the documents or one of the policies that is highly required by the RA, they see how it is documented, it covers all the sections that is required, if it is discussed by the board members and it is approved...*

The issue lay in the lack of total independence for the internal audit department from the managerial team. No procedural guidance had been outlined for handling potential conflicts of interest that might arise with senior administration, a situation that could extend beyond this level to involve various departments within the organisation. An Assistant Manager of Internal Audit in a Big-4, QFC-authorized firm noted:

*As for what you are doing, it is through human resources management. While the most complaints are about the human resources department. This is where there is a conflict of interests and a lack of segregation of duties. And there is no independence in it. This is wrong. It must be addressed as soon as possible. The internal auditor may play a third role, which is: to allocate a team to conduct investigations, especially for cases that require the intervention of internal auditing and in which there are complaints or irregularities, such as what happened to me when I investigated the stores.*

Similarly, the above was supported by Internal Audit Manager in a Big-4 firm:

*If you have such an issue if you have an issue or a problem, or an idea or anything related to whistleblowing just reach out directly to us the top management or the partner which sometimes or most of the cases have, like direct, overseeing or direct control of your career. Let’s call it in in the company. So the independence thing it’s compromised.*

Second, the internal audit takes on the role of a ‘moderator’ in investigations. Their task involves supervising the enforcement of policies and procedures, promoting collaboration amongst all departments. They shoulder the responsibility of ensuring that every employee understand the policies, understands the procedures, and has undergone the essential training. Moreover, they oversee the approach used to communicate the whistleblowing policy throughout the organisation. The Compliance Officer in a QFC-authorized bank clarified:

*...if there is any, any any any reports any incidents that should be reported that mitigate risk and how such as is being managed and controlled. So the internal control or the internal audit will look into these and will requests also from the compliance, the policies and procedures, how these are*

*implemented, how it is communicated to the employees if it is you trained by employees who attended the training and also if there is any, if there is any incident reports it will be requested from the risk management and what's the action plan taken by the risk. Okay.*

An issue arises when the internal audit becomes dependent on departmental reports concerning the communication of whistleblowing policies to employees. To guarantee the accuracy of these departmental reports, it would be more effective for the internal audit to either oversee or actively participate in the training courses themselves.

In its third role, the internal audit team operates as an 'assessor' of the whistleblowing policy's application. They accurately assess the efficiency, effectiveness, and departmental adoption of the policy, ensuring each case is appropriately addressed. Consequently, they propose necessary adjustments to align with the highest standards of whistleblowing practices and procedures. This perspective is supported by an Assistant Manager of Internal Audit at a 'Big 4', QFC-authorized firm.

*The internal audit plays a key role as it will review based on the current whistleblowing policy. The internal audit will review this policy during the annual audit, and the internal audit will review the cases of whistleblowing. This is a very good thing; Because the internal audit will help reveal the effectiveness and efficiency of the whistleblower policy and report it to the audit committee and members of the board of directors.*

Drawing on the previous discussion, an Assistant Manager of Internal Audit, serving at one of the 'Big 4', and duly authorised by QFC, provided a detailed exposition and vivid illustration.

*For example, it may decide that there is a policy for reporting violations and the existence of channels for reporting it, and that the existing team receives reports of the whistleblowing, but it has only dealt with 25% of the cases received, and there are 75% of cases still pending and not addressed. There are no justifications or reasons not to address it. Please be aware of this matter to do the necessary and address these cases as soon as possible. The internal auditor may show that some procedures for whistleblowing do not comply with international standards and do not match the best practices...*

In addition, an Assistant Manager of Internal Audit at a 'Big 4', QFC-authorized firm highlighted the necessity of evaluating not only the unaddressed cases but also the progression of investigations, the substance of investigation reports, and the outcomes. Such analysis is fundamental to identify any potential shortcomings in the policy and initiate the requisite adjustments.

*...they will assess also not only the proceeds but also assess the complaints or the the results of the reports. So, if the results of the reports identify the no suspicious fraud, fraud incidents, suspicious transactions or suspicious behaviour within the firm, the internal auditor or an auditor will drill down you know, they will look at the new scope or new areas where they wouldn't have had insight about... That's the most of the impact of it on the auditing procedures, they will definitely open new insights on the internal audit, they will open new horizons in the scope of the audit. Now, they might help in identifying the new risks they might help identify and identifying new issues that they were not aware of in the first place....*

Finally, the internal audit functions as a control mechanism. The team, while focusing on policies, procedures and adjusting certain technical aspects within various departments, operates within the overarching structure of internal control responsibilities. These are all related to maintaining the integrity of internal control systems. Yet, in circumstances where allegations go beyond their scope, the situation

calls for intervention by a suitable authority. Internal Audit Manager in a Big-4 audit firm under the QFC authority indicated:

*When visiting the cases in whistleblowing, yeah, you will be maybe more aware of the weaknesses of controls and processes. This will help you like maybe it will shorten the time or maybe it will shed the light on specific areas that you will likely look at and try to enhance Yeah okay and this is it might be it is related asides from that in cases like of reporting of abuse or reporting of other kinds of harassment, violation of laws, overriding controls, it might not be really a value adding step in the internal audits, but it is very I think in other aspects.*

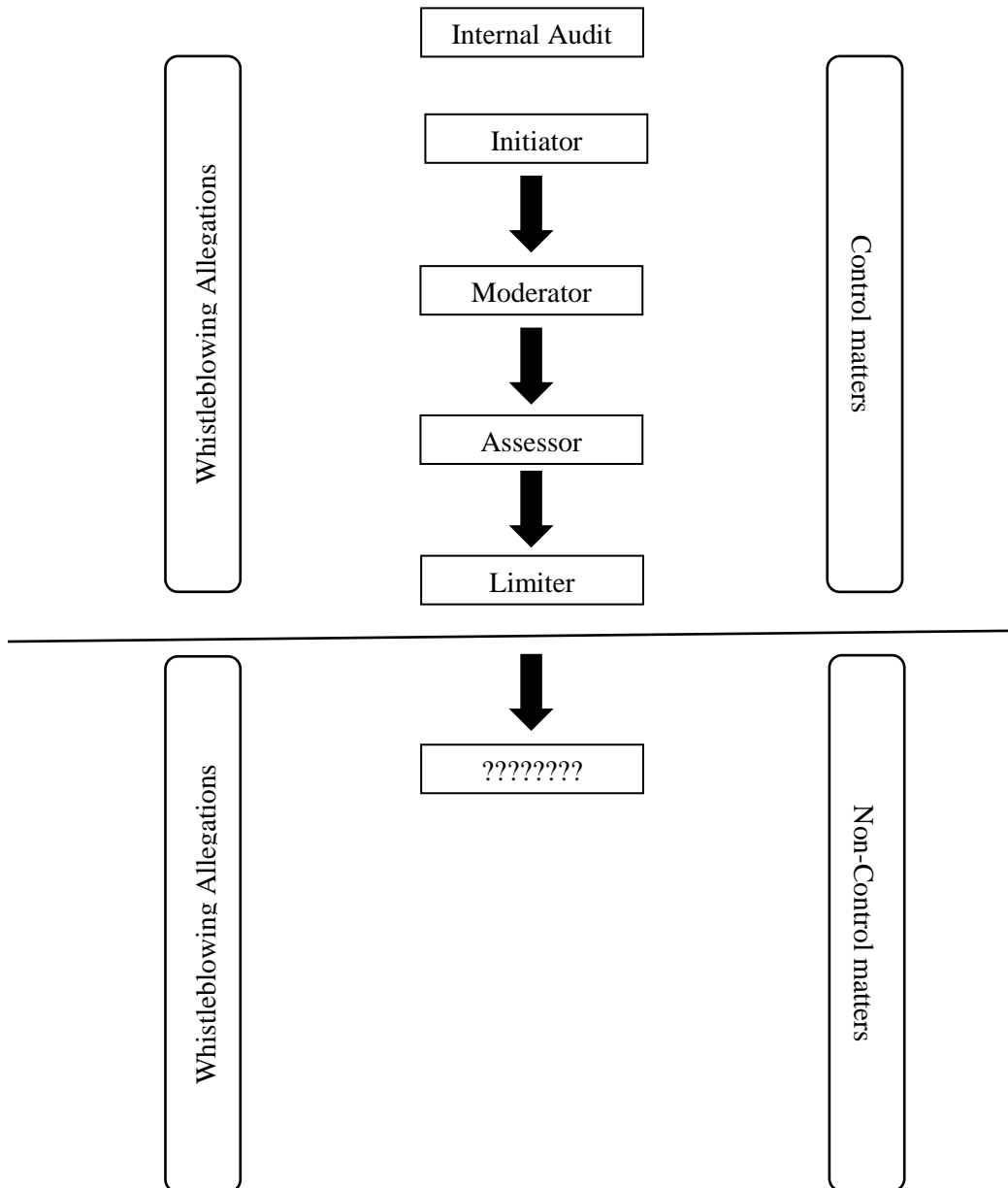


Figure 13: The whistleblowing policy and procedures and the internal audit role model

Throughout our discussion, several challenges related to the internal audit role in the whistleblowing process within the Qatar Financial Centre (QFC) emerged. They were mainly centred around policy implementation, balancing roles, setting boundaries, and enhancing the investigation process. Firstly, the implementation of the whistleblowing policy is a vital area of concern. The internal audit team, tasked with assessing the efficacy of this policy across departments, often deals with inconsistencies in implementation and faces difficulty in recommending best practices. The transparency and uniformity of implementation across departments can aid in fostering trust in the process. Secondly, the internal audit team also serves as a control mechanism. It deals with policy, procedures, and technical issues related to internal control duties. The balancing act between their routine audit responsibilities and the task of managing allegations can be discouraging. The establishment of a separate, dedicated team to deal with allegations can potentially remove this conflict. Thirdly, defining the boundaries of the internal audit team's jurisdiction has been highlighted as an issue. When allegations exceed their remit, an external entity is required to intervene. Clear definitions of their boundaries and stronger collaboration with external entities will ensure seamless transition of cases when needed. Lastly, the credibility of the investigation process was questioned. With verbal reports to the whistleblower deemed insufficient, a more robust, document-supported reporting system would reinforce the credibility of the process.

From the Actor-Network Theory (ANT) point of view, we acknowledge that trust is co-produced through a network of actors – the internal audit team, whistleblowers, management, and other stakeholders (Pianezzi and Grossi, 2020). Trust can be seen as an input and outcome of the collective actions of these actors (Vandekerckhove *et al.*, 2016). The challenges faced by the internal audit team, if unaddressed, may inhibit the functionality of the whistleblowing policy, leading to a sense of distrust. The QFC can potentially address these struggles by fostering a culture of trust through transparent and uniform policy implementation, defining clear boundaries for internal audit responsibilities, reinforcing the collaboration with external bodies, and establishing robust reporting mechanisms. Overcoming these struggles will be instrumental in rebuilding the trust in the whistleblowing process.

#### 6.5.2.4 Evidence and Investigation

Upon receiving a substantiated allegation from a whistleblower, a meticulous process of investigation is instigated, involving several essential steps. Initially, it is crucial to verify the accuracy and relevance of the obtained information with respect to the reported case. Subsequently, the investigative process can commence, where feasible, by logging the case with all related parties to undertake appropriate actions. In the final stage, the results derived from the investigation are conveyed to the right parties. This comprehensive process constitutes what we term as the credibility of the investigation process. Please refer to Figure 13 for a visual representation.

*So the credibility lies will lie in the facts and the evidence is and you know, that the results that they found, regardless of who blow the whistle... Like Of course, it will not just count on the whistleblower right, you will do your own investigations and internal investigations, so that you have supporting evidence to charge the charge that person so that, but that by itself will give the finding the credibility not not the whistleblower himself. (The HR manager in a QFC-authorized bank)*



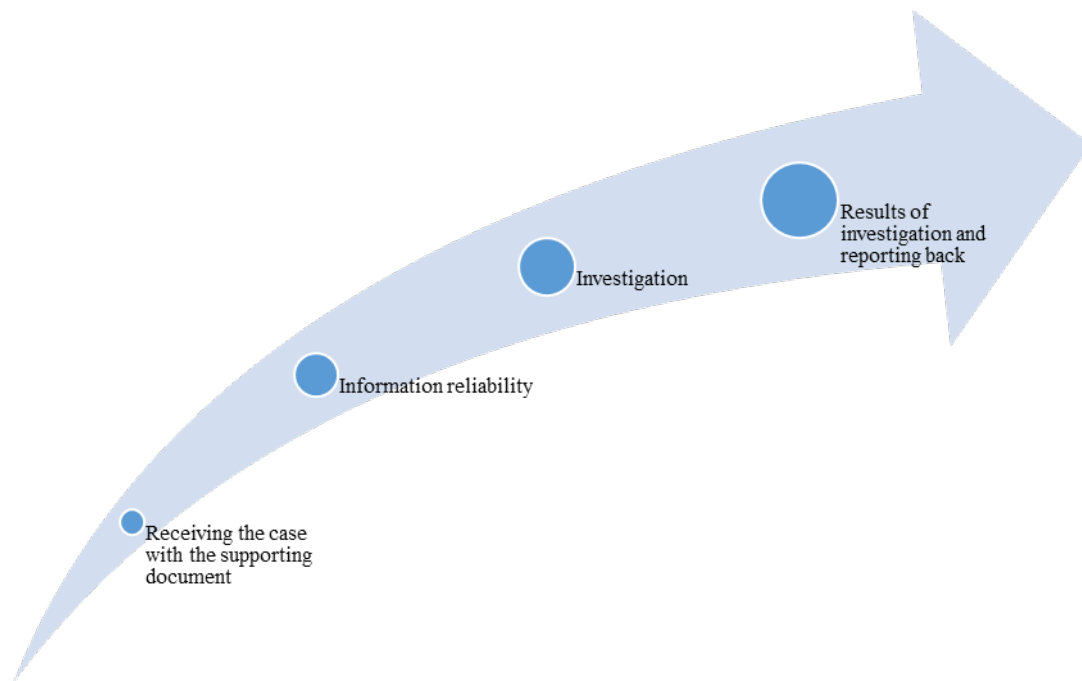


Figure 14: The credibility process of investigation

The procedure at hand scrutinises the trustworthiness of an investigation, with each sequential step enhancing its legitimacy. However, should a company merely verbalise this process to the whistleblower, the significance of credibility tends to lose its weight. In essence, a report generated at the conclusion of an investigation, though verbally strong, lacks conviction without supporting documentation. It thus becomes apparent that evidence stands as the important step towards initiating an investigation, ensuring its credibility from the outset.

“All the details of the incident, how it started, how it became, and how it ended,” (Assistant Manager of Internal Audit in a Big-4, QFC-authorized firm (Big-4 Audit Firm)) indicates the importance of maintaining an accurate, objective, and comprehensive record of the incident. This may serve as a potential defence or tool in seeking justice. “For example, that the employee was attending and committed to working hours, you can attach the attendance and departure record for this period and it can be requested from the Human Resources Department,” presents an example of what could be used as evidence. It also points to the role of Human Resources, suggesting that they should be responsible for maintaining accurate records and providing them when necessary.

In our preceding discussion, we pinpointed significant challenges in the collection and validation of evidence during the whistleblowing investigation in the context of the Qatar Financial Centre (QFC). The role evidence plays in these inquiries is vital; however, struggles in obtaining, verifying, and presenting tangible proof can impede the effectiveness of the whistleblowing policy, thereby emerging distrust. Firstly, obtaining concrete evidence can be a huge task. Whistleblowers, often in vulnerable positions, may find it difficult to secure substantial proof supporting their claims. Secondly, once the evidence is obtained, verifying its authenticity and relevancy becomes important. This is another area where missteps may arise, given the potential for falsification or misinterpretation. Lastly, challenges can appear in presenting this evidence during the investigation, ensuring it accurately and fully represents the claim in question.

To address these struggles, the QFC could introduce comprehensive guidelines and support systems to assist whistleblowers in the evidence collection process. This could include providing secure means to document potential breaches and assisting with the safekeeping of substantiating proof. The implementation of rigorous protocols for evidence verification can also enhance the investigation's reliability. Furthermore, an in-depth training program for investigators regarding evidence handling, analysis, and presentation would ensure a more robust investigation process.

From the Actor-Network Theory (ANT) perspective, trust is produced and sustained through interactions between various actors in a network – whistleblowers, investigators, auditors, and the management, among others (Vandekerckhove *et al.*, 2016). The challenges in the evidence handling process, if left unresolved, can hinder the overall functioning of the whistleblowing policy, leading to a potential destruction of trust within this network (Brink, Eller and Gan, 2015).

In essence, overcoming these challenges to ensure the collection, verification, and presentation of solid, reliable evidence is of utmost importance. Doing so will not only enhance the functionality of the whistleblowing policy but also serve to rebuild trust, fostering a more transparent and accountable organisational culture within the QFC.

#### 6.5.2.5 Anonymity hinder investigation

In line with established policies and procedures, every allegation is treated with the utmost confidentiality. Serious measures are taken to safeguard the identity of the whistleblower. This point is particularly emphasised by the Compliance Officer of a bank authorised by the Qatar Financial Centre (QFC), who remarks:

*As I told you within the policy, there is a section about anonymous allegations and confidentiality, which is that all concerns will be treated confidentially with measures taken not to expose the whistleblowers identity...*

Despite the utmost commitment to confidentiality, there may be instances where additional information or clarifications necessitate the unmasking of the whistleblower's identity during an investigation. It is maintained that in such an eventuality, adequate advice and support will be provided to ensure the safety of the whistleblower.

Yet, the revealing of identity carries implications; the accused may view it as a personal matter. As discussed in the section on protection, the revelation of identity, even when accompanied by guidance and backing, does not offer a fail-safe guarantee of protection. This lack of assurance arises from the diverse cultural perceptions and mind-sets that individuals have.

*...it may not be possible to take action as a result of the employee's disclosure without his help. So the employee may be asked to come forward as witness. Okay. Yes, if the employee agrees to do this, he will be offered advice and support. Also, the policy encouraged the employee who is the whistleblower, to put his name to his allegation whenever possible, whenever possible. But if the employee does not reveal his identity, this might create constraints to protect his position or to provide them with feedback.... (The Compliance Officer in a QFC-authorized bank)*

If the whistleblower wishes to remain anonymous, he may do so, but he is encouraged to mention or write additional details, including his personal information. This step, however, may slow or even inhibit the investigation. Because there is insufficient information to take additional action. This step may also be unfair to the people who are the subject of the complaint as well as the people who reported the allegation. Both banking sector and audit firms within the QFC supported this perspective.

*The challenge is that if there are no additional information given and the investigation process is taking place but cannot reach a certain proportion because there are certain misleading information or insufficient information... the whistleblower should state his name designation and which department he belongs to and in which entity is and his contact number and email address and the subject information or the person against whom you are making allegations... if there is any witness information... if they are available, okay, for the investigation team, they will help in the investigation process, otherwise it will hinder the investigation process. (The Compliance Officer in a QFC-authorized bank)*

Similarly, the above was supported by audit firms within the QFC:

*...now if you want to be anonymous to the investigator, now that's a problem, because that will be challenging, but if you want to be anonymous to the, to the party who has breached your right, or we have breached something else, no, it's a different story. Of course no, I mean, you shouldn't remain anonymous to the entity investigate, because if you are anonymous to the investigator How will the investigator you know, they might from their professional judgement, they might consider other additional details that are required to complete the investigation and the one with the they know that they can't reach anonymous identity; they have the by default they will stop the investigation, how can they you know, all the investigation will not to be accurate or to not be complete because of missing parts here and there. (Assistant Manager of Internal Audit in a Big-4, QFC-authorized firm)*

The role of management is important in the process of an investigation, yet it is a double-edged sword. When management adheres to the principles of transparency, applying policies and procedures without prejudice or favour to all members irrespective of their ranks, the accuracy and effectiveness of the investigation findings are significantly improved, and subsequent actions are more appropriately implemented. This stance is emphasised by an Assistant Manager of Internal Audit within a 'Big 4' firm, authorised by the Qatar Financial Centre, who observed:

*...in in organisations with the control environment, and the control activities and the tone from the top are very weak, the weaker these three elements that I'm talking about are the more likely the investigation will not be effective. but when you have a strong tone at the top you have people with high authority, they don't fear from anyone, who don't do courtesy. And they are determined to develop and improve the place. And they follow up. They treat the janitor as they treat the CEO. Here, I would say the policy will be perfect 100%, but I've had quite an effective to a very great extent.*

Our earlier discussions shed light on a significant struggle within the whistleblower investigation process, particularly concerning the issues surrounding anonymity, a core aspect of this section. While preserving a whistleblower's anonymity is crucial to encouraging individuals to come forward with essential information, it often impedes the efficiency and comprehensiveness of the subsequent investigation (Kensicki, 2006; Guthrie, Norman and Rose, 2012). The core of this struggle is that anonymity can result in a lack of comprehensive information, causing the inquiry to slow down or even stop, ultimately impacting the credibility of the investigation and the trust in the system.

Utilising the Actor-Network Theory (ANT), we can conceptualise this struggle as a series of relationships between human and non-human actors (Mahama and Chua, 2016; Baxter and Chua, 2018). Anonymity, as a non-human actor, interacts with the human actors involved in the investigation, creating a complex network of interactions that can either aid or hinder the investigation. The anonymity policy itself is a critical actor in this network, interacting with and influencing other actors. However, if this policy fails to

function effectively due to struggles such as lack of information, it can create distrust towards the overall system.

Overcoming this struggle within the Qatar Financial Centre (QFC) would involve reassessing and redefining the interaction between actors in the network. Firstly, the policy on anonymity needs to be flexible and adaptable, allowing for a balance between protecting the whistleblower and ensuring an efficient investigation. Achieving this balance would enhance trust in the system, demonstrating that it can adapt to changing circumstances and meet the needs of all involved parties. Additionally, appropriate support mechanisms for whistleblowers, including advice, counselling, and protection, should be reinforced to encourage individuals to come forward without fear of retaliation or personal harm (Kenny and Fotaki, 2023). This proactive approach can help re-establish the trust necessary for the successful operation of the whistleblowing policy within the QFC-authorized firms.

#### 6.5.2.6 Investigation Outcomes

Upon the completion of a comprehensive data collection procedure and subsequent investigation, the derived findings are communicated back to the whistleblower. This debrief affirms that judicial proceedings will be activated against the offender. Yet, the report lacks in its depth of details; it solely showcases the conclusions drawn from the investigation. This scarcity of information leaves a sense of vagueness and uncertainty around the investigation process.

*...procedure it will be dealt confidentiality, there may be more questions addressed to the whistleblower to assure him always that he is protected, he is supported and the results will be communicated to him discretely. And the at the end, if there is a misconduct, a real misconduct, a disciplinary action will be taken against the one who participated or who took this this misconduct or illegal act. (The Compliance Officer in a QFC-authorized bank)*

Undoubtedly, the report would affirm that the concern has been acknowledged and is under review, yet it fails to provide any additional information. This lack of transparency and the ensuing uncertainty could potentially diminish the efficacy of the whistleblowing policy. The Compliance Officer at a bank authorized by the QFC suggests a solution to this difficulty. The officer posits, “Ideally, within a maximum of ten days, the whistleblower should receive a response indicating that their concern has been duly noted and is currently under investigation.”

The amount of information in the report is inherently guided by the specifics of the case, and the employer’s conclusions based on these findings. The parties implicated in the investigation, along with the topic under scrutiny, fundamentally inform the content to be included in the report. Nevertheless, this could impose constraints on the investigation and possibly distort the report’s findings. There might even be a scenario where the complainant is excluded from the investigation. As a result, the persons connected to the case, coupled with the unique circumstances of the case, increase the level of uncertainty in the reports’ conclusions. This perspective was clearly articulated by the HR manager at a QFC-authorized bank:

*...once the report has been made, the bank will notify the employee that you know their reports have been received and they will reply back to them in due time and of course, depending on the gravity of the claim made, it will be decided whether this would require an investigation or you know, it will it can just be resolved with the you know, with with minimum let’s say procedures, and accordingly it will be for example, there’s there will be an investigation, of course, the investigations will be held in confidence and confidentiality the name of the person who has reported this the employee will not be disclosed unless at a later stage they they might be called upon as witnesses of the wrongdoings...*

Individuals choosing to act as whistleblowers have the choice of voicing their concerns within the boundaries of a QFC-authorized firm or directing their allegations externally to the QFCRA. It has been put forth that the route of external reporting could potentially ensure greater protection of the whistleblower's identity, fostering a sense of safety. However, the trade-off lies in the fact that outcomes of such investigations may be somewhat limited, owing to the relatively reduced input of information.

*So basically, those kinds of surveys can usually be done or performed by an external party, or by an internal my company itself, that people feel more comfortable of those surveys has been established for the data will be collected by a third party that make the answers much anonymous. Okay, after the HR, let's assume that HR is the is the department to collect the data, they collect the data and they make an analytical procedure or analytical summary, right? summarising that 20% of the people were satisfied 10% was not satisfied, etc. And they end up with the conclusion and they should pass this conclusion to the decision maker in order to make the survey achieved its objective. (Partner in a Big-4 audit firm under the QFC)*

Senior executives bear the responsibility of cultivating an environment that encourages individuals to come forward with allegations. This responsibility includes fostering an atmosphere of transparency and credibility, demonstrated by openly sharing investigation outcomes and the consequential actions taken against those found guilty of wrongdoing. This transparency can provide a motivation for the public to report any breaches of the law.

Nevertheless, the degree to which an organisation discloses investigation results is inherently influenced by the nature of the case at hand. For instance, sensitive issues such as sexual harassment are dealt with the utmost discretion to protect the identities of those who brought the issue to light. Conversely, this lack of disclosure may unintentionally discourage employees from reporting similar incidents in the future, a concern expressed by an Internal Audit Manager from a Big-4 audit firm under QFC authority:

*like this, like this should be demonstrated at the beginning from the tone of the top. If the one of the top it's clear, they are transparent. If they communicate and share the results, that they are the actions they did to mitigate any issues that have been reported, it will encourage people to you know, they will see results are happening changes happening... but this has to be demonstrated by the top from the top management, yeah... people will be aware that the if the if people are aware of whistleblowing policy, they will a little bit Be more careful. Okay. And the environment in general, even if it's not disclosed, but the environment inside will be a little bit more, let's call it friendly or let's call it better working environment. And that case, people will will be happy in in the internal control culture of the of the company or firm, but if they reported or they disclose that there are sexual harassment and there are frauds and such and such, it will like to get people or maybe make people anxious... but if it's not disclosed and action is taken internally, people will feel more comfortable. They don't really want to management don't really want people to know about those cases they don't want to want to make people fear the internal environment.*

The policy director at the QFCRA also agreed that whistleblowers should report to the regulator whenever they do not trust their respective QFC-authorized firm. And the findings of the investigation will be communicated to the whistleblower:

*...for whistleblowers is if they don't feel confident going to the authorized firm and reporting to the firm I can take another avenue and report to us the regulator... The report is then investigated. And the outcome of that investigation has to be communicated back to the to the whistleblower. Okay, that's how it's supposed to work. So the rule requirements and the practice.*

Looking at the situation from a different angle, maintaining an extreme degree of anonymity could, in fact, pose a significant obstacle when it comes to reporting the results of an investigation. If the party responsible for conducting the investigation lacks necessary or sufficient details relating to the whistleblower, it would become challenging to effectively relay the investigation's findings back to the whistleblower. This point is clarified by the Associate Director, Investment Manager, Advisor and Securities Supervision at the QFCRA.

*...What happened with the whistleblowing process is once we go through the documentation and or the allegation, the report, is we give feedback to the whistleblowing team, and then the whistleblowing team then communicate with the whistleblower. But if it is anonymous, then I think it's I think it's a bit difficult to communicate back, because they supposed to give a feedback or a response to the whistleblower.*

Submitting a complaint to the regulatory authorities may conclude in a dismissal if the transgression falls beyond their jurisdiction. In such instances, the submitted reports are returned while maintaining an ongoing communication with the whistleblower. This reflects a constraint inherent in the policy and framework, signifying an inadequacy and lack of competence in managing varying situations. The Associate Director at the QFCRA enforcement department shed light on this issue.

*So upon receiving the report, the QFCRA, will determine whether it's within the scope. When I say it's within the scope of should like meet all the requirements mentioned in the slide three, if it's out of the scope, it's either should be addressed to different entity in the States, or it should be like dealing with the under cdrs. Or if it's if it's related to grievance or harassment. So it's nothing to do with the whistleblowing. This will be marked as out of the scope and we will go back to them protected report and say this is thank you for submitting your concern and this concern as out of the scope.*

The comments from the participants suggest a considerable deficit in understanding the differences of the whistleblowing policy and its framework. A case in point is the confusion surrounding where to report an allegation that does not pertain to financial impropriety. This issue alone presents a significant challenge for potential reporters.

The investigation outcomes and results in whistleblowing present several noteworthy challenges as evidenced by our discussions. Notably, these challenges may compromise the trustworthiness of the whistleblowing policy, invoking a sense of distrust which can hinder its effectiveness. Firstly, the prevailing uncertainty in the investigation outcomes was prominent. This uncertainty is generated due to limited information provided in investigation reports, influenced by the case's nature and the involved parties. Such ambiguity can compromise the process's transparency and, consequently, trust in the system. Secondly, there is a noticeable struggle related to anonymity, particularly when an elevated level of it hinders reporting investigation outcomes effectively. Whilst anonymity is essential to protect whistleblowers, its high degree can hinder the communication flow, leading to ineffective reporting and fostering distrust. Finally, the framework limitation became apparent when allegations outside of the predefined scope are reported. This inability to act in diverse circumstances signifies a deficiency in the existing policy, further triggering the distrust.

However, these struggles are not insurmountable. Employing the Actor-Network Theory (ANT), these issues can be approached as network struggles that need restructuring for a well-functioning system (Mahama and Chua, 2016). Enhancing the reporting process's transparency is crucial. The sharing of relevant, non-sensitive information could diminish the uncertainty surrounding the investigation outcomes. Therefore, ensuring clear, comprehensive, and meaningful communication, trust in the system can be cultivated. Achieving a balance between maintaining anonymity and enabling effective communication of

investigation results is vital. Policies should be revised to encourage adequate information sharing without breaching confidentiality, thus rebuilding trust. Lastly, expanding the whistleblowing policy's scope to accommodate diverse allegations is essential. Through the methodology of enhancing the framework's ability to act in varying circumstances, trust can be reinstated.

### 6.5.3 Blackballing whistleblowers

The essence of corporate fraud is deeply rooted in the shadows of secrecy. Indeed, one can argue that once such secret activities are exposed, the fraudulent behaviour consequently collapses. Yet, the question remains: why do firms persistently hide the truth and blackball whistleblowers? It appears that self-preservation prevails over integrity.

A fascinating discovery from our research reveals that the administrators of QFC-authorized firms often perceive the exclusion of whistleblowers as a protective measure. This perception, however, does not stem from an attempt to silence those who dare to voice the truth. Instead, it is born out of a desire to evade potential disruptors deemed untrustworthy.

Such an outlook, while illuminating, also emphasises the prevailing misconceptions about the role of whistleblowers within an organisation. There is an urgent need to reassess this perception, for it threatens not only the organisational integrity but also undermines the very principles of transparent corporate governance.

The role of whistleblowing is indeed vital. The manner in which a QFC-authorized firm handles whistleblowers shapes the environment of trust and openness within the organisation. Such an atmosphere is crucial in ensuring that whistleblowing occurs in a timely manner, thereby mitigating instances of fraud. On the contrary, if fraud is allowed to evolve and proliferate in secrecy, it often results in catastrophic outcomes. Thus, the approach to managing whistleblowers not only influences the very occurrence of whistleblowing, but also the suppression of fraudulent activities within the organisation.

Unfortunately, whistleblowers have often faced severe retaliation, including termination of employment, being blackballed, and, in some instances, expulsion from the country. Given the relatively small size of Qatar, news of such incidents spreads rapidly, creating an atmosphere of fear and mistrust. A Senior Associate of Internal Audit at a Big-4 audit firm under the jurisdiction of the QFC disclosed a troubling reality – the likelihood of employees retaining their positions following a whistleblowing event is tragically low. He observed the following:

*They lose their job, you know, we would clearly lose their job. This is what I think that would happen. Plus, maybe kicked out of the country, maybe? Yeah. Yeah. kicked out of the country... Think his history will be on everyone. And everyone will know about his story. And I don't think they would hire him.*

In a parallel sentiment, the Internal Audit Manager from a Big-4 audit firm operating under QFC regulations expressed the ensuing perspective:

*No, no, no. Because whistleblowers are normally called people with attitude. Career suicide. unless you're fed up, or maybe you have nothing else to lose. You will go through this channel.*

Individuals who observed wrongdoings chose to bring them to light as a strategy for their departure. Interestingly, it was discovered that such whistleblowers were indeed re-employed. However, the upper management remained unaware to their past actions as whistleblowers. A senior associate of internal audit from a Big-4 audit firm operating under QFC jurisdiction elucidated on this point, stating, "But they weren't

aware he was a whistleblower, but the leaders were not aware of this... he was involved in a lot of such cases but the leaders were not aware about.”

The practice of blackballing whistleblowers has become a significant obstacle in the effective execution of the policy. Our aim is to convince the decision-makers within QFC-authorized firms that embracing, rather than ignoring whistleblowers, aligns with their ultimate interests. The responsibility of elevating compliance standards and curbing fraudulent behaviour is primarily on the shoulders of compliance professionals within the corporate sphere.

The ability of these professionals to shift management’s stance on whistleblowers can substantially boost the capacity of the compliance community to meet its objectives. This change of mind-set is not merely beneficial – it is critical. By altering perceptions towards whistleblowers and integrating them into the fabric of corporate structure, we enhance the efficacy of our anti-fraud measures and ensure the successful implementation of our compliance policy.

Should the culture within firms evolve to welcome, rather than reject whistleblowers, we stand to witness a considerable reduction in fraud. A victory in this aspect translates to a profound societal shift where whistleblowers are no longer blackballed but are seen as invaluable assets (Berry, 2004; Dyck, Morse and Zingales, 2010).

When fraudulent activities decrease, resources once lost can be utilised with better efficiency. The knock-on effect is an increase in overall wealth, from which everyone benefits. Research has consistently shown a positive correlation between a community’s honesty and the overall welfare of its members (Quayle, 2021). Therefore, eliminating the practice of blackballing whistleblowers does not merely serve a corporate purpose; it also contributes to creating a healthier, more prosperous society. In essence, welcoming whistleblowers is a transformative step towards an improved world in every conceivable dimension.

The struggles in whistleblowing culture, particularly when whistleblowers are blackballed, create a significant barrier to policy effectiveness and undermine trust within organisations operating under the Qatar Financial Centre (QFC). When whistleblowers are hated, it reduces their efficacy as agents of change within the Actor-Network Theory framework. Their isolation impedes the free flow of vital information, thus obstructing transparency and contributing to an environment of distrust. The blackballing practice not only inhibits the whistleblowing policy’s ability to act effectively but also destroys trust in the system itself. Therefore, suppressing the whistleblowers, organisations are indirectly endorsing fraudulent practices, thus deepening the mistrust within the business community and society at large.

To overcome these obstacles, QFC-authorized firms need to undertake substantial cultural changes. This includes reshaping the perception of whistleblowers from troublemakers to invaluable assets (Berry, 2004; Dyck, Morse and Zingales, 2010). Therefore, endorsing whistleblowing instead of avoiding it, organisations can reinforce trust, facilitating a healthier interaction between different ‘actors’ within the network. Moreover, the role of compliance professionals in shifting management’s attitude towards whistleblowers is critical. As defenders of corporate integrity, their ability to influence and bring about this change can substantially contribute towards fulfilling the true purpose of the compliance community.

In essence, it is necessary to eliminate the practice of blackballing whistleblowers and create an environment that encourages and protects them. Not only will this lead to reduced fraudulent activities and a more effective use of societal resources, but it will also foster a trusting environment encouraging to the overall welfare of all stakeholders. The transformation of the whistleblowing culture in QFC-authorized firms is, therefore, a crucial step towards building a better and more prosperous society.

#### 6.5.4 The lack of awareness about the whistleblowing policy



Executives and consultants from the Qatar Financial Centre (QFC) have emphasised the pressing need for staff education and training about the whistleblowing policy. Given that most employees of QFC-authorized companies do not come from a forensic accounting background, their understanding of these processes and policies can often be markedly deficient. Hence, the Director of Prudential Supervision at the QFC Regulatory Authority has illuminated the following:

*Not all supervisors, or government, internal control professionals are trained forensic or fraud examination professionals. And a lot of the time, if you are not, if that's not your forte, you could actually take the evidence, and probably even complicate admissibility in a court of law.... Because in certain instances of the supervisor not being trained in some of these matters, you then internally confer and agree, which is the right way to go through this... the regulatory authorities talked with incredible individuals in different areas of enforcement and the general counsel area of people who have quite a lot of understanding that the normal supervisor in their day to day jobs probably will not have an appreciation of how these things work.*

Following from the above, he emphasised the notion that there is a deficiency in forensic accounting knowledge among employees and even supervisors in QFC-authorized firms, thereby creating challenges in dealing with whistleblowing cases effectively and within the bounds of legal compliance. This highlights the critical need for more robust training programmes and an in-depth understanding of whistleblowing procedures across all levels of the company structure.

In a more detailed explanation, the Director of Prudential Supervision at the QFCRA articulated the role of the regulator in heightening the policy's awareness. While the QFC made an effort to communicate an introductory overview and enlightening session to all pertinent individuals from authorized firms during a town hall meeting, it disappointingly fell short in providing comprehensive sessions with institutions to guide them precisely through the whistleblowing procedure.

The director of prudential supervision at the QFCRA further explained the role of the regulator in raising awareness of the policy. Despite the fact that the QFC provided a brief introduction and awareness session to all concerned individuals from authorized firms at the town hall meeting, the QFC did not hold any sessions with institutions to walk them through the whistleblowing procedure in greater depth.

*And then I think you know, our rules, also the requirement for the whistleblowing framework to provide regular training. So it is the responsibility of their management to actually ensure that there is regular training to all staff on whistleblowing... We haven't had any session specifically with institutions to further walk through the whistleblowing process... I don't think we have seen any instances, at least on my side where we've had direct contact training or sensitising employees at all regulatory institutions apart from the one town hall that was done.*

These statements underline a deficiency in the QFC's policy, pointing out the absence of in-depth training sessions with institutions about the whistleblowing process. This lack of guidance potentially inhibits a comprehensive understanding of the process, emphasising the need for more proactive measures from QFC in educating employees and managers about whistleblowing procedures.

The QFC routinely organises induction sessions targeted at new recruits and existing personnel within the firms they authorise. Yet, it remains necessary that these individuals invest time in understanding the complexities of the whistleblowing policies and procedures on their own. By actively exploring these documents, ideally prior to needing to apply them, they can foster an autonomous understanding. This knowledge should be acquired from resources readily available on the website, ensuring that staff can confidently navigate the complexities of these policies without external aid.

*...they all have to be introduced to this framework, they all have to go through some kind of an introduction or an induction on the framework itself, for them to be able to understand what whistleblowing. So if that explains that answers your question. So someone working on whistleblowing would have to understand what the whistleblowing is. So, we do provide them with regular induction freshmen etc. But employers should the employees working on whistleblowing should have read the policies and procedures they should they are expected to understand the policies and procedures. (Senior Associate at the QFCRA enforcement department)*

The Associate Director of Anti-Money Laundering and Combating Financial Crime at the QFCRA supervision department also validates this notion:

*The other bit of information that we provide, generally to the industry is website. And there's a specific whistleblowing page on our website.*

The QFC's initiatives extend well past conducting induction sessions at town hall meetings. They executed meticulous field visits, undertook regular inspections of authorised firms, and held meetings with their highest-level management. These proactive measures were rooted in the QFC administrators' earnest desire to guarantee that the whistleblowing policy was communicated to every employee within the authorised firms.

Additionally, the QFC administrators sought tangible evidence of these efforts. This was to be supplied through reports to the QFCRA, notably containing records of whistleblowing training sessions conducted throughout the year. The responsibility of delivery fell on the capable shoulders of the compliance department. It was in these detailed accounts of training initiatives where the QFC found reassurance of their policy's successful implementation and ongoing adherence.

*... We see the evidence through the reports that comes to us, like the compliance would provide the training that occurred during the year and we can see one of the session to be on whistleblowing. This is our work just to make sure that that is actually communicate to within the firm. (The Associate Director, Investment Manager, Advisor and Securities Supervision at the QFCRA)*

Earlier, it was outlined that the QFC administrators and consultants insistently advocated for creating awareness about the whistleblowing policy. They committed themselves to implement all requisite measures to guarantee that authorised firms also conducted corresponding awareness sessions for their associates. However, the results of the fieldwork investigation painted a starkly contrasting picture.

Unfortunately, employees within the QFC-authorized firms demonstrated an alarming lack of awareness about the whistleblowing policy. It emerged that managers within these firms seemingly neglected to facilitate policy awareness sessions or to sufficiently inform all of their firms' associates about this crucial policy. Numerous training sessions took place, yet remarkably, none seemed to address the whistleblowing policy directly. Some employees only came across the policy spontaneously whilst undertaking independent research. They observed:

*...this is weird, I think I didn't know about whistleblowing policy. I was working as an internal auditor and in my company, in KPMG. So I didn't know about whistleblowing. I have no idea about it. I didn't know that our company has a whistleblowing policy, that we can use it, you know, what I mean, but how did they know about whistleblowing policy once I went to perform an audit for one of the companies, and I see the audit plan. And one of the steps in audit plan that we need to take check, availability, availability, of whistleblowing policy, after that they start to do my own research, ask and read real policies whistleblowing policies. So that that's how I know about the whistleblowing policy... (Senior associate of internal audit in a Big-4 audit firm under the QFC)*

Despite an employee's inclination to bring forward an allegation, a significant hindrance remains: the unfamiliarity with the proper reporting channels. This issue persists among a majority of staff, indicating a lack of awareness or understanding about the procedure. The absence of clear guidance about where and how to lodge a complaint or allegation is a critical impediment, deterring many potential whistleblowers from taking the crucial step of coming forward.

*honesty, I never tried this hotline I never I don't know any I don't know anything about this hotline landline or like international line also that we supposed to call in case of any unusual action. (Senior associate of internal audit in a Big-4 audit firm under the QFC)*

In a like manner, the Assistant Manager of Internal Audit within a Big-4 firm, authorised by the QFC, made a noteworthy observation:

*For KPMG to guys I've never used throughout my, whenever I had a problem with serious problem mediocre or a minor problem, I would reach out to my partner because, again, we have back then we had the pro the, you know, the approachable partners' ideology. So, I'm not familiar, but what I'm aware of this...*

Indeed, it became surprisingly evident that executives within these companies had a certain discomfort when it came to publicising the policy regarding violation reports and educating their workforce about it. Consequently, this led to a situation where employees remained unaware to the very existence of such a policy. This lack of awareness poses a substantial hindrance, making the prospect of whistleblowing within these companies rather difficult to imagine.

*...they did they don't put upon didn't put the effort to distribute awareness among people are among the please... they're not practising this or no one is like caring about law and policy. That's why I really don't have them. So these kinds of question is difficult for me because we are not practising such a policy... If they practice it, yes. I believe it what it's telling my answer will not be perfect. Why? We never, I never practised. I never, I don't know enough. I mean, the environment where I'm working on, I was working in it was not really helping to practice such policy, you know, corruption was there. (senior associate of internal audit in a Big-4 audit firm under the QFC)*

Remarkably, the field study uncovered that banks were more enthusiastic than other authorised firms in delivering the requisite education and creating awareness around the whistleblowing policy. In these banking institutions, internal control or audit departments rigorously scrutinised the bank's practices. They sought extensive details from the compliance department concerning the implementation and communication of policies and procedures. These departments queried whether employees had received appropriate training and if there had been any recorded incidents.

In the event of reported incidents, the risk management department was particularly interested in understanding the action plan that had been put into motion. An observation from the Compliance Officer in a QFC-authorised bank further emphasises this fact (refer to section Internal Audit and Whistleblowing):

*... by training and awareness, by training of this policy, I conduct a training to the employees okay about the contents of this profit policy and the protection that the entity will provide and if they have anything to report to all the concerned persons and this policy is being okay circulated to all staff in order to refer back to any future references through training and awareness...*

In a similar context, the Human Resources Manager of a QFC-authorised bank delineated the bank's methodical approach to amplifying knowledge surrounding the whistleblowing policy, including the steps for its successful implementation. He expanded on this by stating:

*... it has definitely been communicated to the to our compliance department who consulted with the human resources and we have constructed a whistleblowing policy in line with the Qatar financial centre requirements... in our bank, of course, there's a whistleblowing that has been communicated to all the employees, it's available in a shared folder that the employees can access anytime and also the proper training has been done on on the whistleblowing... And this is part of a certain induction programme and we also do the same. So whenever a new joiner comes, they dedicate a certain amount of time in order to familiarise themselves. And of course, this will be done with the support of the human resources and the compliance and different departments of the bank where they will be familiarising themselves with all such policies and procedures that are being enacted and they are expected to form and of course, for the existing employees. The trainings were done on presentation type basis, certain case studies. And usually, for example, in the field of compliance, we are holding the quarterly trainings, whether in internal trainings or external trainings, but usually, internal trainings are being done quarterly. And all of these topics such as, for example, whistleblowing, such as fraud, such as compliance, AML, etc, all such topics are being reviewed regularly and tackled regularly that say, I would say, quarterly training and for the, for this one in particular, and maybe once a year, it will be it will be given to the existence staff.*

Despite a widespread lack of awareness surrounding the whistleblowing policy among various QFC-authorized firms, excepting banks, it was proposed that sharing historical reports of misconduct, together with the ensuing investigation outcomes, could act as a powerful substance to encourage employees to report wrongdoings. Staff members across QFC-firms highlighted the need to enhance the current status quo to operationalise the whistleblowing policy effectively. This could be achieved through regular awareness sessions and comprehensive discussions on potential implementation scenarios aligning with the policy. A Senior Associate of Internal Audit in one of the 'Big Four' audit firms operating under QFC proposed the following:

*... give real life cases for people, any outcomes... you know, show them that this would happen. show them real life case, like a case that happened. For example, one of my friend, one of my friend was telling me about like Enron and that lady who like, you know, expose them. So, keep them give, make them study these, these cases, make sure it makes sense. I mean, it will change your mentality, it will change their behaviour towards these kinds of actions, these kinds of corruption or like unusual actions, illegal actions. So yeah, this is what I think made them study cases, real life case... they think they need to mention protect but as I told you to make people feel good about or make people feel like safe or make people feel like yeah, we can do this they need to make them go through real life case. real life cases it's gonna encourage people to take take a step and... take an action... (senior associate of internal audit in a Big-4 audit firm under the QFC)*

No one seemed to provide an overview of the whistleblowing rules and procedures, nor did they demonstrate how to use them. Instead of holding the introduction session in person, An Assistant Manager of Internal Audit in a Big-4 (QFC-authorized firm) suggested that a video outlining the reporting standards and processes be made.

The prevailing issue was that no entity appeared to deliver an encompassing explanation of the whistleblowing rules and procedures, nor was there an effort to illustrate their application. To address this, an innovative approach was proposed by an Assistant Manager of Internal Audit in one of the 'Big Four', a QFC-authorized firm. Instead of traditional in-person introductory sessions, they recommended the creation of an instructive video that clearly outlines the reporting standards and processes.

Understanding a policy extends beyond acknowledging its existence on paper. It demands adherence by employees across all organisational tiers. Hence, QFC-authorized firms must strive to cultivate a culture of

compliance, infusing all levels of their organisations, and that means offering comprehensive education, training, and awareness on all vital facets of this process. In the obvious absence of such training and cultural integration, it became evident that the policy had been inadequately executed. The Compliance Officer in a QFC-authorized bank observed:

*in the lack of a whistleblowing policy, you know, if you don't have a policy within the organisation, yes, it will be chaotic, because if there is any misconduct, you don't know to whom you have to raise your concern, what is the process are you protected or not what will be the end result you don't know because there is no policy... you should spread the culture you should spread the compliance culture within the organisation and the role of shredding the components culture is through educating through education and training and awareness Okay, without such awareness training, spreading the culture it may be it may it may be mis properly implemented... even though it is endorsed by the governing body even... we have to educate we have to spread the culture we have to take the initial step to educate, the compliance; the whistleblowing is under the custody of the compliance, the compliance has to give a training have to spread this ad has to update this policy every three years or when needed. This is what I want tell the compliance should do such steps.*

In addition to reporting on policy awareness, participants also portrayed the level of accountability within their companies. For example, an Internal Audit Manager in a Big-4 audit firm, under the QFC authority described, “if people are satisfied with what they see and if people know that management is taking actions even if not knowing the details. This is what this is the policy the idea of the purpose of the whistleblowing is fulfilled.” Similarly, the HR manager in a QFC-authorized bank said, “Well, the intention is definitely to promote a culture of high ethical standards of transparency of proper conduct among the employees and in order to promote proper corporate governance and in the institution itself.” He went on to share:

*... It is something that it's encouraged though the employees will be feeling confident in order to voice their concerns and report any, you know, wrongdoings that they see in front of them. Because of course, the employees are the most exposed, especially employees who are lower in the corporate scale, or the corporate ladder, they are more exposed. So they might see any gaps in their operations and the services or other misconduct being performed. So they are the ones who are more exposed to this. Through the whistleblowing policy, they have a channel in order to raise their concerns, and at the same time they are protected if they do so in in good faith...*

The lack of awareness about the whistleblowing policy framework presents significant challenges to establishing an effective whistleblowing culture (Berry, 2004; Kaptein, 2011). In the absence of in-depth understanding, employees may not understand the processes or protections in place, thereby inhibiting their willingness to report wrongdoing. This ignorance can lead to distrust in the system, which in turn can suppress its functionality, aligning with the actor-network theory that views entities as interdependent actors within a network.

Indeed, organisations such as the QFC-authorized firms struggle to build a culture of trust without a robust understanding and promotion of their whistleblowing policies. This disconnect serves to undermine the policy's credibility and effectiveness, causing employees to view it as a mere 'symbolic' gesture rather than a viable avenue for addressing concerns (Brennan and Kelly, 2007; Hassink, De Vries and Bollen, 2007; Andon *et al.*, 2018; Brennan, 2020). It hinders the whistleblowing policy's ability to 'act' as a trustworthy entity within the network, contributing to an overall atmosphere of distrust. Overcoming these struggles necessitates a holistic approach focused on improving awareness and understanding of the whistleblowing policy across all levels of an organisation. This could involve proactive measures like comprehensive training, open discussions about policy provisions, and clear demonstrations of procedural follow-ups on reported allegations.

To further instil trust and confidence in the whistleblowing mechanism, the process must be transparent and consistently enforced, ensuring that all stakeholders understand that the policy is more than just a formalistic requirement but an integral part of the corporate culture (Berry, 2004; Kaptein, 2011). Ultimately, promoting a culture of trust and transparency, underpinned by an accessible and understood whistleblowing policy, can empower the policy to fulfil its intended function within the organisation's actor-network, rebuilding trust and strengthening its effectiveness.

#### 6.5.5 The absence of clarity in the policy statements

Apart from the fact that QFC-authorized firms had not raised awareness of the whistleblowing policy, the policy itself is not clear enough to be implemented in its procedures. This increased the uncertainty of the future, and as a result, employees avoided working in accordance with this policy and reporting observed violations. In other words, there was a sense of discouragement among the authorized firm's staff and distrusting to act upon this policy. A senior associate of internal audit in a Big-4 audit firm under the QFC said, "... they don't give you clear instruction. They don't they, they, they talk about it as if they are ashamed or like as if they are shy to show more information...". Likewise, the Internal Audit Manager in a Big-4 audit firm under the QFC authority went on to share:

*... The lack of the trust and absence of clarity whistleblowing policy are the main difficulties to act up, accordingly, if anything goes wrong if I blow the whistle, complications can be catastrophic.*

The whole process of whistleblowing was not clear as claimed:

*It is not clear process to be honest, in both companies I worked with in Qatar, it's not very clear. It's always like encouraging people. (Internal Audit Manager in a Big-4 Audit Firm)*

The findings from the research revealed a significant concern amongst employees within QFC-authorized firms. Despite acknowledging the existence of a whistleblowing policy, many felt overburdened with their responsibilities surrounding external auditing. This has unfortunately led to a lack of regular engagement with email communications, hindering their ability to stay abreast of any advancements concerning the implementation of the whistleblowing policy.

*... Honestly, I'm not the kind of person who keeps following on the non business emails that I received. So basically, I received hundreds of emails a day... but we are not aware of this, but I can tell you from my experience... (Partner in a Big-4 audit firm under the QFC)*

The dynamics within QFC-authorized firms tend to highlight a reliable commitment to task completion, often resulting in employees leaving the office in the late hours. This concerted focus has unintentionally shortened their ability to pursue supplementary research, essential in acquiring relevant information concerning whistleblowing contacts and focal points. Additionally, a lack of clarity on the proper channels for official whistleblowing has been noted, notwithstanding a satisfactory level of internal communication. Paradoxically, this uncertainty, compounded by the hesitation surrounding the close connections between high-ranking officials and potential wrongdoers, has inhibited any attempts to report whistleblowing incidents. This perspective was further clarified by an Internal Audit Manager from a Big-4 audit firm, operating under the authority of QFC.

*... it's not clear because in our environment, people, they tend to just try to get the job done, because sometimes you don't leave the office. So we don't really have the time or people, they don't really have the time to do some extra research to get more details about focal contact details or focal points regarding whistleblowing, if there is anybody else... See, again, reporting lines of*

*whistleblowing official whistleblowing not clear. But communication internally, it's fine it is there. But nobody would dare like report any whistleblowing matters.*

Among the employees of firms authorised by the QFC, ambiguity clouded the process of managing whistleblowing reports, engendering hesitation to come forward. The absence of clear guidelines for safeguarding the reporter's identity was particularly disturbing, fostering a reluctance to report allegations. This lack of transparency thus obstructed proactive engagement with whistleblowing procedures. This complex issue was further explicated by an Internal Audit Manager from a Big-4 audit firm operating under the QFC:

*... And if there is clear guidelines, if you want to report this on this, you will have to bring in evidence for example, it will be better for me like setting, you know, clearly maybe or maybe emphasising on the confidentiality, on not on people will not always be called and this will always remain confidential, confidential, nobody will know about any whistleblowing. And in addition to the evidence, if there is an evidence, then you will not be always required to to come to witness to, to disclose to reveal your identity...*

From our previous discussions, it has been made clear that there are considerable struggles when it comes to fostering a whistleblowing culture, especially when there is a lack of clarity in policy statements (Berry, 2004). Such ambiguity in guidelines often instils apprehension and hesitation among employees in QFC-authorized firms, thereby inhibiting the effectiveness of whistleblowing policies and practices.

From a perspective of trust, the absence of clear directives undermines employee confidence in the system, creating a sense of distrust towards the policy itself. Drawing on the Actor-Network Theory (ANT), this distrust can be seen to disable the agency of the whistleblowing policy, rendering it ineffectual and further impairing feelings of uncertainty among potential whistleblowers. These perspective in line with (Lewis and Weigert, 1985; Callon, Lascoumes and Barthe, 2009; Guthrie and Taylor, 2017)

Addressing these challenges, the QFC can effectively cultivate trust and confidence in the system through enhanced clarity and transparency in policy statements. Therefore, providing well-spoken guidelines on policy implementation, reporting mechanisms, and protection of whistleblower's identity, the QFC can amplify the agency of the policy within the network.

Moreover, delivering regular training sessions and creating open channels of communication could reinforce employees' understanding and trust in the policy, encouraging their participation in whistleblowing activities (Kaptein, 2011). Therefore, building an environment that engenders trust and elucidates the whistleblowing process, the QFC can thus strengthen its compliance culture and empower the whistleblowing policy to act as a more effective agent in the corporate setting.

## 6.6 Towards a robust whistleblowing culture: overcoming struggles and restoring faith

The struggles<sup>43</sup>, both technical and cultural, had manifested as ineffectual and imprecise procedures (as noticed in section 6.5). The policy, with its underlying philosophy, had failed to act, signalling an unfulfilled promise. An assemblage of such factors motivated a strong feeling of distrust, casting a pall over the earnest effort invested in defining key criteria, and collaboratively crafting a whistleblowing framework document. Despite the original intentions, the QFC was left feeling betrayed, deprived of the anticipated 'collaboration' during uncertain times.

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<sup>43</sup> Technical struggles: [1] The unguaranteed protection offered to whistleblowers in anonymous reporting, and [2] incredible investigation of anonymous reports. Cultural struggles: [1] resistance to hiring whistleblowers, [2] a lack of awareness about the whistleblowing policy framework, [3] and a lack of clarity in the policy statement.

The policy statements were now seen as ‘symbolic’, unfairly targeting foreign investments and polishing the market image, with the cost being the cultivation of a mutually beneficial and enduring relationship. And, what were the consequences of this growing distrust? For the QFC and its authorised firms, a four-branched strategy was proposed by the QFC-authorised firms staff, aimed at mending and enhancing the relationship: appointing whistleblowers, elevating awareness of whistleblowing culture, educating on the appropriate implementation of whistleblowing, and investing in advanced technologies, such as encrypted channels and secure communication platforms, can ensure confidential and continuous communication between whistleblowers and investigators, protecting identities, enabling secure reporting, and facilitating effective investigation and follow-up.

These strategies were perceived as ‘repair work’. Employees of QFC-authorised firms had their trust in the competency and credibility of the whistleblowing policy weakened. A total disengagement was not feasible, hence these strategies served as a recognition from both the QFC and its authorised firms that distrust had flourished and a necessity for remedial action had emerged.

Moving forward, it is vital to understand the continuous nature of trust and distrust. They are in constant flux, perpetually being crafted, deconstructed, and reformed (Power, 2015; Mahama and Chua, 2016). Acknowledging this fluidity emphasises the importance of continuous effort and commitment to maintaining trust in the whistleblowing policy, which can serve as a firm foundation for the organisational culture of QFC-authorised firms. Such understanding provides an enlightened perspective on the journey ahead, equipping QFC and its authorised firms with the insight and knowledge required to overcome the challenges, repair the current distrust, and foster a more robust and efficient whistleblowing culture. In this instance, the emergence of distrust was met with concerted efforts to rectify the situation and restore faith in the whistleblowing policy.

## 6.7 Analysis concluding remarks

This analysis has sought to explore the emergence and development of the whistleblowing framework, its operational efficiency in suppressing fraud and malpractices, and the consequential effects of significant alterations within this structure.

In response to the first research question, **why and how does the whistleblowing framework emerge?** The whistleblowing framework emerged as a response to initial matters of concern, such as chaos, a rising number of authorised firms associated with escalating instances of fraud, and enhancing the trust outlook of the QFC. In response to these matters of concern, the QFC formed a consultation team who performed calculative methodologies to translate initial matters of concern at a central time into delineated problems. These defined problems were inefficiencies in the current fraud reporting function, non-core function for the QFC, and waste. The QFC consultants promised to develop solutions that would allow them to ‘share value’ and ‘control risks’. The solution was to have a whistleblowing framework. The development process of the framework was influenced by a systematic engagement involving trials of trust, identification of trustworthy whistleblowing framework statements, and a continuous development process. Crucially, familiarity with a range of international frameworks was instrumental in selecting statements for the whistleblowing framework, as it fostered trust in their potential for efficient implementation. In addition, various other departments stood capable of collaborating with the QFC to provide innovative suggestions. These ideas were effectively discussed and convinced the QFC of their potential to deliver on the documented commitments. QFC team members also presented the proposed framework through presentations, engaging in productive discussions with QFC-authorised firms during ‘Town Hall meetings’. The purpose of these interactions was to reinforce the trust that the framework statements would indeed function as painted in the proposed framework, thereby instilling QFC’s faith in this framework. As a result of these trials process, the identities of the chosen statements within the whistleblowing framework gradually became more refined and solid. To this end, a future with a delegated whistleblowing framework promised efficiency, key personnel at the QFC unchained to concentrate on their core competencies, and a



collaborative world of integrated whistleblowing actors at all levels of the process. Thus, the emergence of the whistleblowing framework was a calculated reaction to identified problems, which were moulded into delineated, manageable challenges.

As for the second research question, **how does the whistleblowing framework perform in its strategy and process of operation as an accountability mechanism to suppress fraud and wrongdoings?** The whistleblowing framework initially functioned as a robust accountability mechanism, primarily due to the significant investment in establishing trustworthy framework statements and developing processes. Key to this operation was the concept of 'Fraud Reporting Fearless', which became a valuable indicator of commitment and turned the whistleblowing framework into an accountability-enhancing endeavour. By tracing 'the practice', the analysis demonstrated the efforts of the QFC consultants to create 'strategies' for the interface amid the whistleblowing actors (the QFC departments and the authorised firms). A model of how the whistleblowing framework would practice-as-strategy represents the concept underlying the framework document that had been developed: the establishment of predictable behaviour, mutual value sharing, and information exchange as the basis of a "philosophy". To strategize predictability, criteria were created through 'hypnotised scenarios' and defined the capacity to monitor, supervise and control the development of policies and procedures. The intention behind this strategy was to make behavioural guidelines for what constituted 'proper' activity in certain situations. In other words, the whistleblowing framework in its fixed form would assist in reducing uncertainty. In particular, it constrains the whistleblowing procedures options open to the authorised firms when they develop their whistleblowing policies. In addition to these strategies, reporting information would be exchanged between the QFC and its authorised firms. This strategic system interface would allow the QFC to have quick and stress-free access to the reporting information of all the authorised firms. For the QFC-authorised firms, their readiness to release their share information exposed them to possible 'control' by the QFC management and signalled their commitment to be 'transparent' and 'accountable'. In turn, this signalled that QFC-authorised firms trusted that the QFC management would utilise the information in a 'sensible' way. Hence, the management control system, mainly administrative controls, was expressly recognised as a foundation for building trust and keeping the QFC-authorised firms accountable. In instances of distrust, management control systems served as a diagnostic tool to identify and rectify issues, re-establishing trust and accountability.

Regarding the third research question, **what are the impacts of any significant changes?** The whistleblowing framework in the QFC was fortified as an accountability mechanism since its birth, calculation, and framing. It promised to act as 'Fraud Reporting Fearless'. However, when the framework was put into practice, the final relationship struggled due to issues of complexity and uncertainty. The struggles in practice were composed of new matters of concern, both technical and cultural. The technical matters of concern were: unguaranteed protection in anonymous reporting and incredible investigation of anonymous reports. In contrast, the cultural matters of concern included: resistance to hiring whistleblowers, the lack of awareness about the whistleblowing policy and framework, and the absence of clarity in the policy and procedures. Consequently, these struggles inhibited the whistleblowers, with fear, from acting upon the newly emerged whistleblowing framework and policy. In other words, the uncovered struggles affected the extent to which the policy trusted and, thus, acted. The significant changes or inconsistencies between the expected and actual performances of the whistleblowing framework resulted in profound impacts. When the practices did not align with the commitments set out in the policy statements, a deep sense of disappointment and distrust emerged. These sentiments were notably more intense due to the substantial upfront investments in establishing the framework. It was concluded that the method of establishing a whistleblowing framework could significantly impact its future trajectory, with the feeling of broken trust necessitating 'repair work' to restore faith in the whistleblowing policy and framework.

Overall, the analysis highlighted the importance of trustworthiness, a deep understanding of operational capacities, and the role of management control systems in fostering trust and maintaining control within the whistleblowing framework. It emphasised that the path to a successful whistleblowing framework is a

journey of trust, accountability, transparency, and continuous adaptation to unforeseen complexities and uncertainties.

## 7 Discussion

### 7.1 Overview

This study provides a comprehensive exploration of the emergence, performativity, and impacts of the whistleblowing framework, portraying it as a crucial accountability mechanism for suppressing fraud and wrongdoing within the context of the Qatar Financial Centre (QFC). It sheds light on the profound association between trust and management control system, which emerge as crucial elements in the policy-making process. Drawing upon Callon's translation stages, the study dismantles the microcosm of calculative practices and agencies, thus enabling a comprehensive understanding of the whistleblowing policy framework.

The primary objectives of this study are to:

1. Understand the process by which the whistleblowing framework was emerged in the QFC.
2. Understand the performativity of the framework in its strategy-as-practice in suppressing fraud and wrongdoing.
3. Evaluate the impacts of the whistleblowing framework on organisational practices and the overall culture of accountability within the QFC.

By addressing these objectives, this study contributes to the existing literature on whistleblowing (Gao and Brink, 2017; Lee and Xiao, 2018; Brennan, 2020), management control systems (Malmi and Brown, 2008; Goebel and Weißenberger, 2017; Mahama *et al.*, 2023), and trust (Lewis and Weigert, 1985; Boedker and Chua, 2013; Mahama and Chua, 2016b) by providing insights into how a whistleblowing framework can be developed and implemented to enhance transparency and accountability in the organisations.

The findings of this research have significant implications for regulators, financial institutions, and policymakers in Qatar and other jurisdictions. Understanding the factors that contribute to a trustworthy whistleblowing framework can help organisations design effective mechanisms for reporting and addressing unethical behaviour, thereby fostering a culture of integrity and ethical conduct.

In the following sections, we will dig into the key themes and insights derived from the empirical evidence collected during this study. The discussion will shed light on the centrality of management control system, the significance of trustworthiness, and the ongoing dynamics of trust within the QFC whistleblowing framework. Through this examination, we aim to deepen our understanding of whistleblowing practices and their impact on organisational governance and accountability.

### 7.2 The centrality of calculation and whistleblowing dynamics

Management control system emerged as a vital element within the whistleblowing framework, playing a crucial role in managing struggles and rebuilding trust within the QFC system. However, management control system was not a standalone practice but rather intertwined with various other practices that contributed to the overall effectiveness of the framework. Trustworthiness, a fundamental concept within the whistleblowing framework, encompassed a multitude of dimensions. To establish trust, it was necessary for the policy statements to be clear, familiar, and trusted in practice. Trustworthiness went beyond mere compliance; it required actions and behaviours that instilled confidence and reliability.

Within the QFC environment, building trust through the whistleblowing framework had several important implications. Firstly, it facilitated innovation by encouraging QFC-authorized firms to generate new ideas and solutions that even the QFC might not have considered. Therefore, fostering a culture of trust, the

framework provided an encouraging environment for creativity and novel approaches to combating fraud and wrongdoing.

Secondly, trustworthiness in the whistleblowing framework was crucial for demonstrating competency. QFC-authorized firms needed to showcase their capabilities and expertise in handling whistleblowing cases effectively. Competency in handling reports and investigations enhanced the credibility of the framework and instilled confidence in potential whistleblowers.

Thirdly, meeting the authorisation requirements set by the framework was an essential aspect of building trust. Adhering to the specified criteria and regulations signified a commitment to transparency and ethical conduct. It reassured stakeholders that the QFC-authorized firms were operating within a robust and trustworthy framework.

Additionally, the whistleblowing framework necessitated joint production of key operating criteria. This collaborative approach ensured that the framework was inclusive and representative of the diverse perspectives and expertise of the stakeholders involved. Therefore, involving multiple actors in the development process, the framework gained legitimacy and engendered a sense of shared responsibility.

Fearless reporting, coupled with accountability, was another vital element of the whistleblowing dynamics within the QFC. Whistleblowers needed assurance that their reports would be handled responsibly and that appropriate actions would be taken to address the issues raised. This encouraged individuals to come forward without fear of retaliation and reinforced the trustworthiness of the framework.

Furthermore, the whistleblowing framework had the potential to generate future cost savings in terms of controls and shared value. Therefore, promptly identifying and addressing fraudulent activities, the framework minimised the financial and reputational risks associated with such incidents. This not only protected the interests of stakeholders in the QFC but also allowed for resource optimisation and enhanced organisational efficiency.

Compliance with the fixed whistleblowing framework was essential for maintaining trust. The framework provided a set of guidelines and procedures that ensured consistency and fairness in handling whistleblowing cases. Compliance demonstrated a commitment to ethical standards and accountability, reinforcing the trustworthiness of the system.

Transparency in fraud reporting was another critical factor in building trust. QFC-authorized firms were expected to be open about the reporting of fraudulent activities within their organisations. Therefore, sharing information on fraud reporting, firms demonstrated their commitment to tackling wrongdoing and protecting the interests of stakeholders.

Commitment to a long-term relationship was a core principle of the whistleblowing framework. It involved honouring promises, acting in alignment with the philosophy behind the policy document, and fostering a sense of trust over an extended period. Sustained commitment to ethical practices and continuous improvement instilled confidence in the efficacy of the framework.

The centrality of calculation and whistleblowing dynamics within the QFC revealed the significance of management control system and trustworthiness. The practices management control systems were integral to the functioning of the whistleblowing framework, while trustworthiness encompassed various dimensions and behaviours. Building trust enabled innovation, competency demonstration, meeting authorisation requirements, joint production of key criteria, fearless reporting with accountability, cost savings, compliance with the policy framework, open fraud reporting, and commitment to a long-term relationship. These elements collectively contributed to the effectiveness and trustworthiness of the whistleblowing framework within the QFC.

To support the discussion on the centrality of calculation and whistleblowing dynamics, academic literature provides valuable insights. For instance, a study by Kaplan *et al.* (2009) emphasises the crucial role of control in facilitating effective whistleblowing mechanisms. The authors highlight that control systems, such as internal controls and financial reporting, are essential for ensuring the accuracy and reliability of information related to fraudulent activities. They argue that a robust control system enhances the trustworthiness of whistleblowing processes by providing accurate data and facilitating timely investigations.

In addition, research conducted by Seifert, Stammerjohan and Martin (2014) and Soni, Maroun and Padia (2015) shed light on the significance of trustworthiness within whistleblowing frameworks. The authors suggest that trustworthiness is not solely based on compliance with policies and regulations but also relies on ethical behaviour, transparency, and accountability. Their findings indicate that trust in the whistleblowing framework is influenced by the perceived fairness and integrity of the system, which in turn affects the willingness of individuals to report wrongdoing.

Furthermore, a study by Guthrie and Taylor (2017) highlights the importance of building trust and fostering a culture of fearlessly reported whistleblowing. The authors argue that organisations should create an environment where employees feel safe and supported when reporting fraudulent activities. Latan, Ringle and Jabbour (2018) highlight that accountability and clear channels for reporting and handling cases are crucial to building trust and encouraging individuals to come forward as whistleblowers.

In terms of cost savings and value sharing, research by Near and Miceli (2016) provides insights into the financial implications of effective whistleblowing frameworks. The authors demonstrate that a robust whistleblowing system can lead to substantial cost savings by preventing and detecting fraud early on. They argue that such systems not only protect organisations from financial losses but also contribute to value creation by ensuring the integrity of financial information and maintaining stakeholder trust.

To encapsulate this section, the centrality of calculation and whistleblowing dynamics within the QFC emphasises the significance of management control systems and trustworthiness. The practices management control systems, such as administrative controls and cultural controls, play a crucial role in managing struggles and rebuilding trust within the whistleblowing framework. Trustworthiness, encompassing various dimensions and behaviours, is essential for fostering innovation, competency demonstration, meeting authorisation requirements, joint production of key criteria, fearless reporting with accountability, cost savings, compliance with the policy framework, open fraud reporting, and commitment to a long-term relationship. Academic studies provide valuable insights into these dynamics, emphasising the role of accounting control, trustworthiness, and the financial implications of effective whistleblowing frameworks.

### 7.3 Trustworthiness and emergent trust types

Trustworthiness, as observed in the whistleblowing framework within the QFC, is not a static concept but a process that evolves over time through various practices and artefacts. The meaning of trustworthiness encompasses multiple aspects and involves both “What(s)” and “How(s)” of trustworthy actions (Mahama and Chua, 2016). It is essential to understand the dynamic nature of trust types and their relevance in shaping the whistleblowing practices and policies.

In the context of the whistleblowing framework, different types of trust, such as competence trust and calculative trust, can be matched with the requirements for trustworthy behaviours (Mahama and Chua, 2016). Competence trust refers to the belief that the QFC-authorized firms have the necessary skills, knowledge, and expertise to implement effective whistleblowing practices. Calculative trust, on the other hand, involves assessing the cost-benefit analysis of engaging in trustworthy actions to develop a policy. These trust types contribute to the overall perception of trustworthiness within the framework.

It is important to note that the emergence of trust types and their characteristics are not predetermined but rather shaped through the practices and artefacts employed to discover a trustworthy whistleblowing policy (Mahama and Chua, 2016). The consultation process plays a crucial role in selecting the best whistleblowing practices and determining the breadth or narrowness of the framework. Therefore, engaging in a consultative approach, the QFC sought to adopt innovative ideas that may have emerged, allowing for a more comprehensive and effective whistleblowing policy.

Academic research in the field of whistleblowing highlights the significance of trust types and their dynamic nature. For example, a study by Maroun and Solomon (2014) explores the interplay between trust, accountability, and whistleblowing. The authors argue that trust in an organisation is influenced by perceptions of competency and integrity, which are important factors in encouraging individuals to blow the whistle on wrongdoing. Their findings suggest that building trust through transparent and accountable practices enhances the willingness of employees to report misconduct.

Furthermore, research by Maroun and Gowar (2013) explores the role of trust in shaping whistleblowing behaviour. The study emphasises the importance of trustworthiness in fostering an environment where individuals feel comfortable reporting unethical practices. It suggests that organisational trust, which includes elements of competence and reliability, is crucial in encouraging whistleblowing and ensuring the effectiveness of reporting mechanisms.

Overall, trustworthiness within the whistleblowing framework of the QFC is a process that emerges from various practices and artefacts. Different types of trust, such as competence trust and calculative trust, can be matched with the requirements for trustworthy behaviours. The consultation process and the consideration of trust types contribute to the selection of the best whistleblowing practices. Academic studies support the understanding of trust dynamics and highlight the role of trust in encouraging whistleblowing behaviour and ensuring the effectiveness of reporting mechanisms.

#### 7.4 The significant upfront investment and its outcomes

The whistleblowing dynamics within the QFC were shaped by a significant upfront investment of resources, efforts, and time, accompanied by a heavy reliance on calculation. This investment aimed to establish a robust framework capable of addressing concerns, fostering trust, and promoting accountability. However, the whistleblowing framework encountered various struggles, both technical and cultural, which resulted in breaches of commitments and highlighted the need for ongoing efforts to rebuild trust and reconstruct relationships within the organisation.

The QFC's commitment to developing a comprehensive whistleblowing framework involved substantial investments in infrastructure, technology, and human resources. The intention was to create a system that could effectively identify and address issues, facilitate timely reporting, and protect the interests of stakeholders. However, despite these efforts, the framework faced various challenges that impacted its outcomes.

The realisation that breaches occurred despite the significant upfront investment raised questions about the effectiveness of the implemented measures and the expectations placed on the whistleblowing framework. It highlighted the complexity and challenges associated with fostering a culture of accountability and preventing fraudulent activities within an organisation. This disappointment highlighted the need for continuous evaluation and improvement of the whistleblowing dynamics to address the gaps and enhance the framework's efficacy.

However, the disappointment also served as a promoter for an ongoing effort to re-establish trust and reconstruct relationships within the organisation. The QFC recognised the importance of learning from past experiences and committed to taking proactive measures to address the identified shortcomings. This

included reviewing and strengthening administrative and cultural controls, revisiting policies and procedures, and engaging in open dialogues with stakeholders to rebuild confidence.

The QFC's response to the mixed outcomes of the upfront investment demonstrated a willingness to acknowledge and rectify any shortcomings in the whistleblowing framework. Therefore, investing in post-implementation evaluations and actively seeking feedback, the QFC aimed to continuously improve the effectiveness and reliability of the framework. This ongoing effort showcased the organisation's commitment to transparency, accountability, and trustworthiness.

Furthermore, the disappointment and subsequent actions will be taken by the QFC highlighted the importance of a comprehensive approach to whistleblowing dynamics. It emphasised the need to consider not only the technical aspects, such as calculation and resource allocation, but also the social and cultural factors that contribute to a trustworthy and effective framework. Building trust and preventing breaches of commitments required a holistic approach that encompassed a clear understanding of the challenges and complexities inherent in whistleblowing processes.

Boedker and Chua (2013) assert that accounting is an affective technology, influencing emotions and actions through practices and templates. They highlight how local actors overlook breaches of trust and proactively develop new control mechanisms. Their study reveals that trust is actively constructed through ongoing interactions and practices. Similarly, our whistleblowing framework findings show the feeling of broken trust triggered an ongoing efforts to 'repair work' to restore faith in the whistleblowing policy and framework. This emphasises the importance of understanding and managing emotions within organisational contexts to achieve positive outcomes.

To summarise, the significant upfront investment of resources and time, driven by a heavy reliance on calculation, within the QFC's whistleblowing dynamics yielded mixed outcomes. While breaches of commitments led to disappointment, they also triggered an ongoing effort to re-establish trust and reconstruct relationships within the organisation. The QFC's response demonstrated a commitment to continuous improvement and a comprehensive approach that goes beyond technical measures. Therefore, learning from past experiences, the QFC aimed to enhance the effectiveness and reliability of the whistleblowing framework, reinforcing its commitment to transparency, accountability, and trustworthiness.

## 7.5 Trials of trust and performance measurement

In the context of the QFC whistleblowing framework, trust emerges as a crucial element that undergoes recurring trials and requires ongoing evaluation. The administrators at the QFC, along with the authorised firms, mobilise trust as a means to ensure the effectiveness of the whistleblowing policy. Trust is viewed as a dynamic concept that necessitates continuous objective assurance of performance meeting expectations (Mahama and Chua, 2016).

Performance measurement plays a vital role in establishing trust within the whistleblowing framework. It serves as a foundation for trust by providing a tool for assessing and controlling the organisation's actions and behaviours. Therefore, monitoring and evaluating performance, QFC's administrators and authorised firms can demonstrate their commitment to maintaining high standards of ethical conduct and responsiveness to reported wrongdoing.

Moreover, performance measurement acts as a mechanism for accountability and transparency. It enables the evaluation of the effectiveness and efficiency of the whistleblowing policy, ensuring that it aligns with the objectives and expectations set by the QFC and stakeholders. Thus, having clear performance indicators and measurement processes in place, trust can be fostered as stakeholders can witness the commitment to upholding the integrity of the whistleblowing framework.

Trust is not a static concept but rather a constant practice and a work in progress. The trials of trust refer to the challenges and uncertainties that arise during the implementation of the whistleblowing framework. These trials may include concerns about the reliability and effectiveness of the reporting system, the perceived responsiveness of the administrators and authorised firms, and the overall credibility of the policy.

The ongoing evaluation of policy practice is essential to address these trials and reinforce trust. It involves monitoring the performance of the whistleblowing framework, collecting feedback from stakeholders, and making necessary adjustments and improvements. Thus, actively engaging in the evaluation process, the QFC and authorised firms demonstrate their commitment to maintaining trustworthiness and continuously improving the effectiveness of the whistleblowing practices.

Research in the field of performance measurement supports the importance of trust as a constant practice and the need for ongoing evaluation. For instance, a study by Mahama and Chua (2016) explores the role of trust in shaping business alliance and behaviour. In the context of the QFC whistleblowing framework, we emphasise the significance of trust as an ongoing process that requires continuous nurturing and monitoring to ensure its effectiveness in encouraging individuals to report misconduct.

Furthermore, research by Melitski and Manoharan (2014) examines the relationship between performance measurement and decision-making. The study highlights the importance of establishing performance indicators and measurement systems to enhance transparency and accountability within organisations. Within the whistleblowing context of the QFC, it suggests that performance measurement provides a basis for trust by enabling stakeholders to evaluate the organisation's adherence to ethical standards and its commitment to addressing misconduct.

To reiterate, the QFC whistleblowing framework encounters trials of trust that require ongoing evaluation. Trust is mobilised by the administrators and authorised firms as a means to ensure the effectiveness of the policy. Performance measurement serves as a foundation for trust, providing a tool for controlling the organisation and demonstrating commitment to ethical conduct. Trust is viewed as a constant practice and a work in progress, necessitating continuous evaluation and improvement. Academic research supports the understanding of trust dynamics and highlights the importance of ongoing evaluation and performance measurement in fostering trust and accountability within whistleblowing frameworks.

## 7.6 Adjustments to routines and the actorhood of materiality

Within the whistleblowing context of the QFC, routines and documents governing actions and emotional behaviour are subject to adjustment by skilled actors. These actors have the ability to modify established routines and procedures in their search for a trustworthy whistleblowing framework. In this section, we will explore the adjustments made during this process, including the alteration of procedures in the pursuit of co-production and innovation. Furthermore, we will emphasise the importance of investigating trust as practice and validating the actorhood of materiality, highlighting the impact of artefacts and documents that are not solely the result of activity.

Skilled actors, such as administrators and staff in the authorised firms, play a crucial role in shaping and refining the whistleblowing practices within the QFC. They have the expertise and knowledge to make adjustments to existing routines and procedures in order to improve the effectiveness and trustworthiness of the framework. Therefore, engaging in a continuous process of review and adaptation, these actors seek to create a whistleblowing system that meets the evolving needs and expectations of stakeholders.

During the search for a trustworthy whistleblowing framework, adjustments are made to various aspects. This includes modifications to procedural aspects, such as the reporting process, investigation procedures, and follow-up actions. Thus, refining these procedures, actors aim to enhance the efficiency and fairness of the whistleblowing system, ultimately building trust among potential whistleblowers.



Furthermore, adjustments are also made in the name of co-production and innovation. Co-production involves engaging stakeholders, including employees and external parties, in the design and implementation of the whistleblowing framework. Therefore, incorporating diverse perspectives and input, actors can ensure that the framework is responsive to the needs and concerns of all stakeholders. Innovation, on the other hand, involves exploring new technologies and approaches to enhance the effectiveness and accessibility of the whistleblowing system. These adjustments reflect the commitment of actors to continuously improve and adapt the framework to meet emerging challenges.

Understanding trust as practice requires acknowledging the role of artefacts and documents in shaping behaviour and decision-making. Artefacts, such as policy statements, reporting forms, and guidelines, have an impact on how actors perceive and enact trust within the whistleblowing framework. These artefacts are not passive entities but active contributors that influence and guide actions. They serve as tools that actors utilise to navigate the complexities of whistleblowing and to ensure consistent and reliable practices.

The actorhood of materiality emphasises that artefacts and documents are not solely the result of activity but have agency and influence of their own. In the context of the QFC whistleblowing framework, artefacts and documents are intentionally designed to elicit trust and guide behaviours. They reflect the collective effort and expertise of skilled actors in developing a robust and trustworthy whistleblowing system. Therefore, recognising the actorhood of materiality, we can appreciate the role these artefacts play in shaping the whistleblowing practices and fostering trust among stakeholders.

To validate the actorhood of materiality, researchers and practitioners can investigate the effectiveness and impact of artefacts within the whistleblowing framework. This can be achieved through qualitative and quantitative analysis, including interviews, surveys, and observation of whistleblowing practices. Therefore, understanding how artefacts influence behaviours and perceptions of trust, actors can make informed adjustments to improve the design and implementation of the whistleblowing system.

Research in the field of organisational studies and trust supports the importance of investigating trust as practice and recognising the actorhood of materiality. For example, studies by Lowry *et al.* (2013) and Mahama and Chua (2016) emphasise the role of artefacts and routines in shaping organisational practices and trust dynamics. These studies highlight that artefacts are not passive objects but active elements that influence behaviours and contribute to the establishment of trust within organisational contexts.

Overall, skilled actors within the QFC whistleblowing framework have the ability to adjust routines and documents in their pursuit of a trustworthy system. Adjustments are made with the aim of co-producing and innovating the whistleblowing practices. These adjustments involve modifying procedures, engaging stakeholders, and incorporating new technologies to enhance the effectiveness and trustworthiness of the framework. Trust as practice recognises the active role of artefacts in shaping behaviours and fostering trust among actors. Understanding the actorhood of materiality validates the influence of artefacts and emphasises their intentional design to guide whistleblowing practices. Thus, investigating trust as practice and recognising the actorhood of materiality, actors can continually improve the whistleblowing system and enhance its trustworthiness.

## 7.7 Discussion concluding remarks

In conclusion, this discussion chapter has provided a comprehensive exploration of the whistleblowing framework within the context of the Qatar Financial Centre (QFC). The study aimed to explore the emergence of the whistleblowing framework as an accountability mechanism and examine its performativity and impacts. Throughout the discussion, several key themes have emerged, highlighting the centrality of calculation and whistleblowing dynamics, the importance of trustworthiness and different trust types, the trials of trust and performance measurement, and the adjustments to routines and the actorhood of materiality.

Management control system has been identified as a significant factor in managing struggles and rebuilding trust within the whistleblowing system. Trustworthiness, as a broad concept, encompasses various aspects that are crucial for framework statements to be clear, familiar, and trusted in practice. Building trust facilitates innovation, competency demonstration, meeting authorisation requirements, and jointly producing key operating criteria. Fearlessly reported whistleblowing with accountability not only contributes to ethical conduct but also generates potential cost savings and value sharing.

The discussion has emphasised the importance of complying with the fixed whistleblowing policy framework and being open about fraud reporting information. Commitment to a long-term relationship, keeping promises, and acting in alignment with the philosophy behind the policy document have been identified as essential elements for a trustworthy whistleblowing system.

Furthermore, trustworthiness is not a single event but a process that emerges from various practices and artefacts. Different trust types, such as competence trust and calculative trust, can be matched with the requirements for trustworthy behaviours. Trust is a constant practice that requires ongoing evaluation of policy practice and continuous objective assurance of performance meeting expectations.

In addition, it becomes evident that whistleblowing dynamics are closely intertwined with the continuous and reflexive nature of trust-building. It is not merely the establishment of a whistleblowing system that matters; the way it is integrated into the organisation's fabric significantly influences its trajectory. The case of the QFC's whistleblowing framework elucidates this complexity. The significant upfront investment of resources and time, emphasised by a heavy reliance on calculation, yielded mixed outcomes. On one hand, it contributed to a profound sense of disappointment when breaches of commitments were observed. On the other hand, it stimulated an ongoing effort to re-establish trust and reconstruct relationships within the organisation. Whistleblowing dynamics, therefore, become a crucial indicator of the organisation's trustworthiness. They provide a mirror to the organisational philosophy, reflecting the interplay between promises made and the ability to deliver on them. Any perceived failure to meet these expectations is not only seen as a technical incompetence but also a reflection on the character of the organisation, causing a rupture in the trust fabric.

Adjustments to routines and the actorhood of materiality have been highlighted as crucial aspects of co-producing and innovating the whistleblowing practices. Skilled actors play a vital role in modifying procedures, engaging stakeholders, and incorporating new technologies to enhance the effectiveness and trustworthiness of the framework. Artefacts and documents within the whistleblowing system actively shape behaviours and decision-making, contributing to the establishment of consistent and reliable practices. Validating the actorhood of materiality through rigorous research methods enables actors to make informed adjustments and improve the design and implementation of the whistleblowing system.

Overall, understanding and addressing these key themes, stakeholders within the QFC can work towards developing a robust and trustworthy whistleblowing framework that fosters ethical conduct, enhances accountability, and promotes a culture of transparency. This discussion chapter serves as a foundation for further research and practical interventions in the field of accounting whistleblowing, contributing to the broader understanding of how trust and management control system intersect within organisational settings.

## 8 Summary, reflections, and conclusions

### 8.1 Overview

This study set out to explore whistleblowing processes within the context of the Qatar Financial Centre Regulatory Authority (QFCRA) and gain a deeper understanding of their emergence, development, and impacts. The study formulated three research questions to guide our investigation: (1) Why and how does the whistleblowing framework emerge? (2) How does whistleblowing framework perform in its strategy and process of operation as an accountability mechanism to suppress fraud and wrongdoings? (3) What are the impacts of significant changes in the whistleblowing framework? Looping back to these original questions, the findings shed light on several important aspects of whistleblowing processes and their implications. The following sections will provide a summary of the key findings, their contributions to the literature, implications for policymakers, limitations of the research, and suggestions for further research.

### 8.2 Key findings

Through in-depth discussions and extensive analysis conducted in this study, several key findings have emerged, providing valuable insights into the whistleblowing processes within the Qatar Financial Centre Regulatory Authority (QFCRA). These findings shed light on important aspects of the whistleblowing framework, uncovering the dynamics and implications within the QFCRA context:

1. Whistleblowing framework emergence: the exploration has revealed that the emergence of the whistleblowing framework within the QFCRA was driven by a clear need to address identified problems, including inefficiencies, non-core functions, and waste. The development of this framework involved a systematic approach, characterised by deliberate engagement, trust-building, and continuous refinement of framework statements. Notably, the selection of trustworthy framework statements was informed by a combination of familiarity and confidence in their potential for efficient execution. This highlights the significance of establishing a solid foundation based on trust and credibility.
2. Performance as an accountability mechanism: management control system has emerged as a crucial device influencing the performance of the whistleblowing framework as an effective accountability mechanism. The framework's success relies on key elements such as transparent reporting, regular monitoring, and systematic evaluation. These components play instrumental roles in enforcing accountability, ensuring transparency, and building trust within the organisation. Management control system, in particular, acts as a diagnostic tool, allowing for the identification and rectification of issues that arise, thereby contributing to the re-establishment of trust and accountability.
3. Impacts of significant changes: the study has highlighted the profound impacts that significant changes or inconsistencies within the whistleblowing framework can have on the organisation. Breaches of commitments within the framework have resulted in disappointment and distrust among stakeholders, further intensified by the substantial upfront investments made during the framework's establishment. Consequently, it is necessary for the organisation to engage in continuous efforts aimed at restoring trust and rebuilding relationships. These efforts should address the concerns that arise due to inconsistencies, reaffirming the organisation's commitment to whistleblowing practices and emphasising the importance of maintaining transparency and accountability.

## 8.3 Contributions to the literature

The in-depth discussions held throughout this study have made contributions to both the theoretical and empirical aspects of the literature on whistleblowing. These contributions have expanded our understanding and shed new light on the functionality and emergence of whistleblowing policies.

### 8.3.1 Theoretical contributions

1. Micro and macro dynamics in whistleblowing through a practice perspective: the ANT approach encourages us to efface the distinction between macro and micro dimensions of whistleblowing and to rather, focus attention on how macro and micro interactions produce effects that come to represent whistleblowing. Doing so has generated comprehensive insights about whistleblowing practices in this setting. The majority of prior research (e.g., Kaplan *et al.*, 2012; Brink, Lowe and Victoravich, 2013; Stubben and Welch, 2020) focused only on the micro-level to understand the determinants of whistleblowing and how the potential whistleblowers will interact with the whistleblowing. Besides, other studies (e.g., Bowen, Call and Rajgopal, 2010; Maroun and Gowar, 2013; Baloria, Marquardt and Wiedman, 2017) limited their focus on the macro-level to understand the best regulatory whistleblowing design without exploring how the potential whistleblowers will interact with these policies. The emergence of the whistleblowing framework has effects, making whistleblowing thinkable and operable. By tracking the development of whistleblowing from the outset, we demonstrate the importance of a management control system throughout whistleblowing's lifecycle. The management control system was crucial for translating matters of concern, solutions, and future promises. It was engaged in a series of ongoing trust-related trials. The management control system was not a kind of control that arose after the whistleblowing was created; rather, it actively shaped both the genesis of the whistleblowing framework and its subsequent implementation style.
2. Processual understanding of trust: in whistleblowing studies, trust has typically been treated as a dichotomy – it either exists or it does not. As stated before, prior research (e.g., Seifert *et al.*, 2010; Seifert, Stammerjohan and Martin, 2014; Brink, Lowe and Victoravich, 2017; Guthrie and Taylor, 2017) may have been limited by viewing trust as a thing without understanding its emergence and the network of relationships that shape it. Unfortunately, this view of trust does not capture the dynamic nature of trust formation, evolution, and its influences. For trust is not an entity that exists outside of practice rather it is constituted by and constitutes practice. We highlight that trust emerges as an actively constructed entity through ongoing interactions, practices, and technological engagements such as embedded in the management control system, extending the notion of the management control system as an affective technology. We show the temporality and emotional dimensions of the situations in which there were continual trials of trust and sentiments of disappointment that resulted from substantial investment in finding and choosing trustworthy whistleblowing policy statements. This insight emphasises the active role of trust within an organisation. It reveals how management control practices 'mediate' trust relationships, fostering trust when present and serving as a diagnostic tool to rectify issues when distrust arises, thereby re-establishing trust.
3. The emergence of autonomy in policy development: prior studies (e.g., Read and Rama, 2003; Alleyne, Hudaib and Pike, 2013) have often missed the interplay between autonomy and control in shaping whistleblowing policies. This oversight presented an opportunity to explore the debate between fixed policy creation and its evolving nature. Distinguishing the QFCRA's regulatory framework from firm-specific whistleblowing policies reveals the complex balance between mandated standards and company practices. At first, the QFCRA's strategy of giving QFC-

authorised firms autonomy seems like a hands-off approach. However, this perceived autonomy conceals deeper control mechanisms. While these firms may feel independent, they remain bound to QFCRA mandates, displaying its policies and training initiatives. This reveals that autonomy can also serve as an indirect form of control. In substance, the illusion of freedom is closely tied to oversight, illustrating the complex dynamics between autonomy and oversight.

### 8.3.2 Empirical contributions

Through the comprehensive discussions, the study has made noteworthy empirical contributions by exploring the whistleblowing framework in the context of Qatar, a developing country (Onyango, 2021), with a specific focus on the QFCRA case. The findings provide valuable insights into the specific challenges and opportunities within this organisational context. The following points elaborate on the empirical contributions of the study:

1. Anonymity in whistleblowing is a double-edged sword: the role of anonymity within whistleblowing is profoundly significant. In prior studies (e.g., Kaplan and Schultz, 2007; Curtis and Taylor, 2009; Guthrie, Norman and Rose, 2012), academic discussions on the topic have consistently highlighted the crucial nature of anonymity. It is widely believed that for individuals to share their concerns, they must feel securely shielded by guaranteed anonymity. However, evidence from this study suggests a more complex setting. Although the protective attraction of anonymity is taken for granted, findings from our study suggest that anonymity may undermine whistleblowing. A common anxiety among potential whistleblowers is that anonymous reporting may not allow for successful investigation. This is because investigating claims made in anonymous reports will require the provision of further and better particulars. The efficacy of this process will depend on further information provided by the whistleblower. But if a claim requires further scrutiny, it may be challenging to investigate an anonymous report without adequate direct communication. Hence, the efficacy of whistleblowing hinges on a careful balance between anonymity and participation in investigations. Should a whistleblower become too involved, their protective shield of anonymity risks being compromised. An attempt at a solution may reside in technology. We can protect a whistleblower's identity by leveraging encrypted channels and secure communication platforms while facilitating crucial dialogue. Such innovative methods retain trust and reassure those courageous enough to voice concerns.
2. The influence of hiring decisions on whistleblowing effectiveness: prior research on whistleblowing has often taken a reductionist view, and perceived whistleblowing as an individual act, focusing predominantly on the moral impetus (e.g., Alleyne *et al.*, 2017; Latan, Ringle and Jabbour, 2018) or the economic considerations (e.g., Alisa G. Brink, Lowe and Victoravich, 2017) guiding potential whistleblowers. Such a binary approach may overlook the interplay between an individual's ethical commitments and their concerns about potential professional repercussions. We highlight that the hiring practices play a decisive role in the effectiveness of whistleblowing initiatives. While whistleblowers are inherently motivated by a sense of moral accountability to expose wrongdoings, the staff of QFC-authorised firms also contemplate the economic consequences of their actions. A predominant concern is the risk of facing dismissal and the subsequent challenge of securing employment elsewhere. This intertwined relationship between moral accountability and economics influences an individual's decision to report misconduct. The looming 'shadow of the future', dominated by economic anxieties, can discourage potential whistleblowers. Organisations need to adopt a more inclusive hiring stance to reinforce the impact of whistleblowing policies. By actively recruiting those with a history of whistleblowing, the QFC-authorised firms can affirmatively convey that they value the act of disclosure and the individuals behind it. The industry must recognise whistleblowers as torchbearers of transparency and integrity rather than outcasts. By cultivating an organisational culture that appreciates and safeguards them,

we can lessen their potential reputational harm and create a conducive environment for honest reporting.

3. Cultural impediments - rethinking whistleblowing strategies in organisational contexts: existing studies (e.g., Hwang *et al.*, 2008; Zhang, Chiu and L. Wei, 2009; Zhang, Chiu and L.-Q. Wei, 2009; Guthrie and Taylor, 2017) often overlook the deep-seated organisational cultures that might deter whistleblowing. Many societies have a deep-rooted instinct to shield family and close relations, even if it means turning a blind eye to wrongdoings (Anduiza, Gallego and Muñoz, 2013). Such cultural norms can inadvertently suppress whistleblowing initiatives, no matter how well-intentioned. For whistleblowing to succeed, more than policy changes are needed; a foundational cultural shift is vital. Driving this transformation in the QFC necessitates innovative education methods. Traditional teachings might fall short. Instead, as highlighted in this study, impactful tools like infographics and motion graphics videos might better cultivate a whistleblowing-friendly culture.
4. Elevating audit practices through empirical exploration of whistleblowing roles: existing studies (e.g., Curtis and Taylor, 2009; Liyanarachchi and Adler, 2011; Erkmén, Çalışkan and Esen, 2014; Soni, Maroun and Padia, 2015; Alleyne *et al.*, 2017) primarily concentrate on auditors' demographic attributes in whistleblowing scenarios, overlooking their broader operational challenges. The internal audit team is crucial for tailoring and overseeing whistleblowing procedures. However, the auditors within QFC-authorized firms often face obstacles to accessing essential information from other departments, hindering comprehensive investigations. Organisational collaboration is vital. As highlighted in this study, a centralised database could offer auditors timely access to necessary data. Moreover, auditors should diversify their expertise beyond traditional auditing and accounting realms to tackle diverse whistleblowing cases.

#### 8.4 Implications for policymakers

In the context of Qatar, particularly within the QFCRA, there are several implications that policymakers must consider to implement whistleblowing frameworks effectively:

1. Effective communication and awareness specific to Qatar's socio-cultural environment: policymakers in Qatar must prioritise strategies that resonate with the local culture and context and implement effective communication and awareness strategies (Brennan and Kelly, 2007). For example, mass mobilisation campaigns should be carefully tailored to align with Qatari values and customs, utilising local media channels, community cultural groups, and religious institutions to enhance awareness and understanding among employees and disseminating information (Ames, Seifert and Rich, 2015; Okafor *et al.*, 2020). Engagement with local stakeholders and collaboration with entities with cultural acceptability within Qatar will help build trust and facilitate understanding of whistleblowing policies and procedures. Additionally, various media channels, including artworks, announcements, seminars, workshops, and social media platforms, can contribute to the effective communication of whistleblowing policies (Berry, 2004; Kaptein, 2011).
2. Culture-based transformation reflecting Qatar's unique identity: policymakers should recognise the importance of culture-based transformation in combating fraud and corruption, emphasising the need to incorporate indigenous cultural traditions, practices, and ways of seeing into the organisational framework of Qatari institutions (Okafor *et al.*, 2020; Onyango, 2021). Creating a supportive culture that adopts public ethics is essential for the long-term success of whistleblowing policies (Quayle, 2021). It is crucial to engage with the cultural values and norms of the Qatari society to foster trust, encourage ethical conduct, and establish a shared commitment to combat fraud and wrongdoing (Latan, Ringle and Jabbour, 2018). Policymakers can leverage cultural

institutions and community organisations with historical and cultural acceptability in Qatar to promote a culture of integrity and accountability. This approach will allow whistleblowing policies to resonate more deeply with the local public.

3. Technological advancements aligned with Qatar's vision for innovation: policymakers should invest in advanced technologies that comply with Qatar's National Vision 2030 is essential to enhance the performance and security of whistleblowing frameworks (Lowry *et al.*, 2013). Using encrypted channels and secure communication platforms tailored explicitly to Qatar's regulatory environment can ensure confidential and continuous mutual communication between whistleblowers and investigators. These technological advancements can help protect whistleblowers' identities, provide secure reporting channels, and facilitate effective investigation and follow-up. Being abreast of the latest technological developments, and aligning them with the country's digital transformation strategy, will enhance the efficiency of the reporting process within the Qatari context.

By reflecting on these specific insights tailored to Qatar, policymakers can build robust whistleblowing policies and practices that foster transparency, trust, and ethical conduct within Qatari organisations. This approach centred on Qatar's unique cultural and organisational distinctions, will contribute to preventing and detecting fraud and corruption effectively.

## 8.5 Limitations of the research

While the study has provided valuable insights into the whistleblowing framework within the QFCRA and its implications for management control systems, trust, and organisational practices, it is essential to acknowledge its limitations in order to ensure a comprehensive understanding of the research:

1. Contextual specificity: the exploration primarily focused on the QFCRA and its whistleblowing framework, which may limit the generalisability and comparability of the findings to other organisational contexts and jurisdictions (Langley *et al.*, 2013). The specific characteristics and dynamics of the QFCRA, as well as the unique cultural and regulatory environment in Qatar, may influence the whistleblowing processes and outcomes. Therefore, caution should be exercised when applying the findings to different settings. Further research is needed to explore the applicability and transferability of the findings to diverse organisational contexts.
2. Qualitative nature: the discussions primarily relied on qualitative research methods, such as interviews and thematic analysis, to explore the whistleblowing practices within the QFCRA. While qualitative research provides rich and in-depth insights, it also has limitations. The reliance on self-reported data from a small sample size may introduce biases and limit the generalisability and comparability of the findings. To enhance the robustness and validity of the findings, future studies could incorporate quantitative approaches and larger sample sizes (Near and Miceli, 1985). This would allow for statistical analyses and the validation of the qualitative findings, providing a more comprehensive understanding of whistleblowing practices.
3. Limited scope of stakeholders: the discussions primarily focused on the perspectives and experiences of accountants, auditors, and senior management within the QFCRA. While these stakeholders play crucial roles in whistleblowing processes, other relevant actors, such as whistleblowers themselves, were not extensively explored (Mesmer-Magnus, 2005). Future research could broaden the scope of stakeholders to gain a more comprehensive understanding of the dynamics and challenges faced by all parties involved in whistleblowing.
4. Time constraints: the discussions conducted within the scope of this research were subject to time constraints, which may have limited the depth and breadth of the analysis. Further research could benefit from longer engagement periods and more extensive data collection to capture a broader

range of perspectives and allow for a more comprehensive exploration of the whistleblowing framework (Brown *et al.*, 2014).

5. Cultural influence: The cultural context of Qatar, with its specific cultural norms, values, and societal expectations, may have influenced the whistleblowing practices within the QFCRA. It is essential to recognise that cultural factors can significantly shape the attitudes, behaviours, and perceptions related to whistleblowing. Future research could further investigate the interplay between culture and whistleblowing practices in other cultural context to provide a more different understanding of the cultural influences on whistleblowing effectiveness.

By acknowledging these limitations, future research can build upon the current findings and address these gaps to advance our knowledge of whistleblowing practices, their effectiveness, and their applicability in various organisational contexts. Understanding the limitations helps to refine research methodologies and guide future investigations, ultimately contributing to the development of more comprehensive and different frameworks for whistleblowing policies and practices.

## 8.6 Suggestions for further research

To further advance our understanding of whistleblowing processes and their effectiveness, there are several areas that require further research. Building on the discussions we have had, the following areas present opportunities for future investigation:

1. Identity formation and management control systems: there is a need to explore the intersection between management control systems and identity formation within organisations. Möllering (2013) emphasises the role of trust and distrust in shaping individuals' identities through their interactions with those they trust and with those who trust them. Investigating how trust-building processes are influenced by the interplay between management control systems and individual and collective identities can provide valuable insights into the dynamics of whistleblowing and its impact on organisational culture.
2. Affective dimensions of management control systems: the affective dimensions of management control systems have been relatively unexplored. Further research is needed to dig into the emotional context of organisations and how management control systems shape or influence affective regimes (Boedker and Chua, 2013). Understanding the emotional aspects of whistleblowing can shed light on the motivations, experiences, and reactions of individuals involved in the whistleblowing process (Reckers-Sauciuc and Lowe, 2010).
3. Whistleblowing and trust in non-profit organisations: non-profit organisations operate within unique contexts and face specific challenges when it comes to whistleblowing (Rothschild, 2013). Investigating the dynamics of whistleblowing and trust in these organisations can provide insights into the interplay between cultural and formal controls in reporting fraud and misconduct. This research can contribute to the development of tailored whistleblowing policies and practices for the non-profit sector.
4. Principles-based vs. rules-based approaches: the relationship between principles-based (emphasising autonomy) and rules-based (emphasising control) approaches to whistleblowing is an interesting area for exploration (Mahama *et al.*, 2023). Understanding how these approaches interact and influence fraud reporting and policy-making practices can inform the design and implementation of whistleblowing frameworks. Comparative studies across different jurisdictions can provide valuable insights into the effectiveness of various approaches.
5. Networks of actors and trust: the behaviour of networks of actors in different settings and their impact on trust and the practices of management control systems require further investigation (Chua



and Mahama, 2007; Mahama and Chua, 2016). Understanding the translation of concerns through calculative agencies and the role of various actors in shaping trust and management control systems can shed light on the complex dynamics within organisations. This research can contribute to the development of more effective strategies for establishing and maintaining trust within whistleblowing frameworks.

We can deepen our understanding of the complex relationships between management control systems, trust, and whistleblowing by addressing these research gaps. This knowledge will contribute to developing more effective policies and practices in combating fraud and corruption, ultimately fostering a culture of accountability and transparency within organisations.

## 8.7 Concluding the Journey

In conclusion, the extensive discussions and analysis have provided valuable insights into the emergence, development, and impacts of whistleblowing processes within the QFCRA. The integration of a practice perspective and Actor-Network Theory (ANT) has enriched our understanding of whistleblowing as a complex process situated within networks of human and nonhuman actors. We have identified key findings related to the emergence of the whistleblowing framework, its performance as an accountability mechanism, and the impacts of significant changes. These findings contribute to both theoretical and empirical aspects of the literature on whistleblowing.

From a theoretical perspective, the study expands upon existing theories by highlighting the dynamic and performative nature of whistleblowing processes. By considering both human and nonhuman actors, we challenge the traditional view of whistleblowing as a single event or symbolic artefact. Instead, we emphasise the importance of understanding whistleblowing as a process that emerges and achieves temporary stability through translation processes. This theoretical framework provides a more different understanding of the functionality and effectiveness of whistleblowing policies.

Empirically, the study offers insights into the whistleblowing framework within the QFCRA. We have identified the crucial role of management control system in enforcing accountability, ensuring transparency, and rebuilding trust. By emphasising the importance of transparent reporting, regular monitoring, and systematic evaluation, we contribute to the understanding of how practices of management control system can support whistleblowing processes. The empirical findings provide a foundation for further research and inform policymakers about the specific challenges and opportunities within the QFCRA.

The implications of the findings extend to policymakers involved in the development and implementation of whistleblowing policies. Effective communication and awareness strategies are crucial for the successful adoption of whistleblowing policies. Policymakers should invest in mass mobilisation campaigns and collaborate with trusted cultural institutions to enhance awareness and comprehension among employees. Additionally, policymakers should recognise the significance of culture-based transformation in combating fraud and corruption. Incorporating indigenous cultural traditions and practices into the organisational framework fosters trust and accountability. Furthermore, the study suggests the importance of technological advancements in enhancing the performance and security of whistleblowing frameworks. Policymakers should consider investing in advanced technologies, such as encrypted channels, to ensure secure and continuous communication between whistleblowers and investigators.

While the study provides valuable insights, it is important to acknowledge its limitations. The contextual specificity of our research, focusing on the QFCRA, limits the generalisability and comparability of our findings. Additionally, the qualitative nature of our discussions and the reliance on self-reported data may introduce biases. Moreover, the study had a limited focus on stakeholders, mainly accountants, auditors, and senior management within the QFCRA, with minimal exploration of whistleblowers' perspectives. Time constraints also impacted the depth and breadth of the analysis. Future research could adopt

quantitative approaches and larger sample sizes to validate and expand upon our findings. Longer engagement periods and extensive data collection are suggested for future research to comprehensively explore the whistleblowing framework.

To wrap up the journey, the study contributes to the literature on whistleblowing by integrating a practice perspective and Actor-Network Theory (ANT) to gain a deeper understanding of whistleblowing processes within the QFCRA. The findings provide valuable insights into the emergence, performance, and impacts of whistleblowing policies. The implications for policymakers highlight the importance of effective communication, culture-based transformation, and technological advancements in enhancing the effectiveness of whistleblowing frameworks. While there are limitations to our research, further exploration of the intersections between management control systems, trust, and whistleblowing will advance our understanding of these processes and inform future policy and practice.

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## 10 Supplementary information

Appendix 1: Famous whistleblowing stories			
Year	Name	Organisation	Action
2002	<b>Sherron Watkins</b>	<b>Enron</b>	Sherron Watkins, as vice president, acted as a whistleblower against Enron when she realised that it was engaged in accounting fraud. In 2001, Enron was involved in one of the biggest bankruptcy cases in the US, which caused large numbers of people to become unemployed and investors to lose their investments. Sherron Watkins started to suspect CFO Andrew Fastow after he had asked her to lie to Enron's partners regarding their investments. While analysing the assets that were set to be sold to raise funds, she checked the excel spreadsheet six times. However, when it was re-checked, it was found to be empty and was hiding millions of debt. Enron is remembered as an infamous corporation that defrauded both its employees and investors. The company top executives were involved in the fraud that caused it to collapse. The main culprits of the Enron scandal were CFO Andrew Fastow, Chairman Kenneth Lay, and CEO Jeffrey Skilling (Curwen, 2003).
2002	<b>Cynthia Cooper</b>	<b>WorldCom</b>	WorldCom was established in 1983 and, by 1999, it had become the 25 <sup>th</sup> largest company in the US. In 2000, its stock price was at its peak, but had begun to decline in 2001. However, whistleblowing played a significant role in exposing its organisational and political crimes worldwide. In this case, Cynthia Cooper, as vice president of internal audit, played a major role in the decline of WorldCom by exposing the corruption, thereby saving the investors and the marketplace. Initially, she started to suspect the company's operations, as she noticed odd reactions from the financial executives when she investigated. Additionally, CFO Scott Sullivan further told Cynthia to delay capital-expenditure reports. Later the investigation revealed that Scott Sullivan was engaged in a multi-billion dollar fraud. Bernard Ebbers (CEO) was also influenced by Scott Sullivan because of the decision to buy MCI. The scandal occurred when WorldCom was found to have accumulated a debt of US\$40 billion (Homer and Katz, 2008).
2002	<b>Diann Shipione</b>	<b>San Diego</b>	In 2002, Diann Shipione, a trustee and a former member of the San Diego City retirement board, made the Council aware of the rise of pension benefits and stated that a drop in the funding of pension would cause a financial crash in the City. In 2003, she challenged a US\$500 million offer for sewer bonds although the offer was later cancelled by the City. Additionally, the City further admitted that misleading information had placed it in financial trouble and that the issue was that pointed out by Diann. She was credited for identifying the illegal underfunding of the city's pension fund. The underfunding scandal cause a turn down in the City's financial and political sector (Bauder, 2009).
2003	<b>Diane Urquhart</b>	<b>Canadian Government</b>	She is a former industry executive of senior securities and an independent financial analyst. She was a whistle-blower in the financial system of Canada. She investigated and revealed that


			the commercial paper, which was backed with assets, was accountable for a loss of 7 to 13 billion \$. The money was held by the government, treasuries, and the corporation funds. She exposed that Dominion Bond Rating Services (DBRS), Ontario Securities Commission, and the Federal Office of the Superintendent of Financial Institution (OSFI) were responsible for incurring the losses (Urquhart, 2007)
<b>2006</b>	<b>Michael G. Winston</b>	<b>Countrywide</b>	A financial executive. He blew the whistle on Countrywide financial by exposing fraud. He sued as well as penalised Countrywide for an extraordinary amount. Additionally, he was an executive in Countrywide and had noticed that the business done by Countrywide was of the utmost foolishness. The company was engaged in funding loans regardless of assets or income. Winston refused to misrepresent data and facts regarding the company and questioned its CEO, Angelo Mozilo, regarding the practices of the company, which led to his dismissal. However, after three years, he won his legal battle (Nicastro, 2016).
<b>2006-2010</b>	<b>Richard M. Bowen</b>	<b>CitiGroup</b>	A chief underwriter of financial services. He was the whistleblower of CitiGroup. Bowen constantly informed CitiGroup's executive officers about the risks associated with their business practices and warned them about the potential losses related to mortgage lending. He identified the fraudulent practices of the company when he observed how poorly certified mortgages were being sold to investors Freddie Mac, Fannie Mae, and others, mentioning that those were quality certified mortgages. As he kept warned the board of directors and the executive management in regard to such fraudulent practices, he was replaced. Later, he submitted a large volume of evidence regarding the fraudulent activities of CitiGroup to the Security and Exchange Commission. In 2010, he further testified on the fraudulent activities of CitiGroup on national television. However, he found that the key points of his testimony had been removed, as some of the people accountable for that massive fraud were not prosecuted (Cohan, 2013).
<b>2013</b>	<b>Laurence Do Rego</b>	<b>Ecobank</b>	Laurence Do Rego was an executive director of Finance and Risk. She reported to senior management in regard to the regulators of Nigeria along with alleged fraud. In 2002, Do Rego joined Ecobank, which was a well-known lender. She served the company as CFO between 2005 and 2009. Then, in 2010, she was appointed an executive director. She exposed fraud when she called out to the Nigeria Securities and Exchange Commission in regard to how Chairperson Kolapo Lawson along with Chief Executive Thierry Tanoh wanted to sell assets below the prevailing market value. Furthermore, she also spoke out on how she had been pressured to clear off the debts owned by Lawson's business (Kay, 2014)

Appendix 2: Terms and Definitions			
No.	Term	Definition	Source
<b>Wrongdoings</b>			
1.	Fraud	“a broad legal concept that generally refers to an intentional act committed to secure an unfair or unlawful gain”	(KPMG Forensic, 2014)
2.	Misconduct	“a broad concept, generally referring to violations of laws, regulations, internal policies, and market expectations of ethical business conduct”	(KPMG Forensic, 2014)
3.	Wrongdoing	Fraud, Misconduct, and error	Author
<b>Whistleblowing</b>			
4.	Whistleblowing	“the disclosure by organisation members (former or current) of illegal, immoral, or illegitimate practices under the control of their employers, to persons or organisations that may be able to effect action”	(Near and Miceli, 1985)
5.	Whistle-blower	“whistle-blowers are current or former organisation members of persons whose actions are under the control of the organisation, who lack authority to prevent or stop the organisation's wrongdoing, whether or not they choose to remain anonymous in blowing the whistle and whether or not they occupy organisational roles which officially prescribed whistleblowing activity when wrongdoing is observed”	(Near and Miceli, 1985)
6.	Receipt (Individual)	“a complaint is made to someone other than or in addition to the immediate supervisor”	(Near and Miceli, 1985)
7.	Receipt (Channel)	“making the complaint through other than prescribed channels (i.e., the chain of command) represents going public, insofar as all groups outside the immediate work group are viewed as the public”	(Near and Miceli, 1985)
8.	Wrongdoer	Committed fraud/misconduct	(Robertson, Stefaniak and Curtis, 2011)
9.	Wrongdoing	White Fraud: Real Earnings Management Manipulations: “Earnings management occurs when managers use judgement in financial reporting and in structuring transactions to alter financial reports to either mislead some stakeholders about the underlying economic performance of the company, or to influence contractual outcomes that depend on reported accounting numbers”	(Healy and Wahlen, 1999)
10.	Organisation (Firm, enterprise, entity etc.)	Companies regulated by Qatar Financial Centre Regulatory Authority – the place where a wrongdoing occurs	(Qatar Financial Center Regulatory Authority, 2018)
11.	Investigator	Assessor of the Whistleblowing Report	(Qatar Financial Center Regulatory



			Authority, 2018)
12.	Whistleblowing Report	<p>“means a report that meets all of the following requirements:</p> <p>(a) it is made in good faith;</p> <p>(b) it is about an authorised firm or a person connected with such a firm;</p> <p>(c) it is made to the firm itself or an authority or officer specified;</p> <p>(d) if it is made to an authority or officer, the authority or officer is responsible for matters of the kind reported;</p> <p>(e) it gives information that the reporter believes shows that any of the following has happened, is happening, or is likely to happen:</p> <p>(i) a criminal offence;</p> <p>(ii) a contravention of a relevant requirement, or a failure to comply with a legal obligation of another kind; ...”</p>	(Qatar Financial Center Regulatory Authority, 2018)
<b>Actor-Network Theory</b>			
13.	Actor (or actant)	“Both human beings and non-human actors such as technological artefacts”	(Walsham, 1997)
14.	Actor-network	“Heterogeneous network of aligned interests, including people, organizations and standards”	(Walsham, 1997)
15.	Translation	“Creating a body of allies, human and non-human, through a process of translating their interests to be aligned with the actor-network”	(Walsham, 1997)
16.	Black box	“A frozen network element, often with properties of irreversibility”	(Walsham, 1997)
17.	Action Nets	“The actors cannot then be studied without at the same time paying attention to the network through which their identities are defined”.	(Czarniawska, 2004)

Appendix 3: Summary of the empirical findings in prior studies		
Whistleblowing actors	Internal Channel	External Channel
<b>[1] Whistle-blower:</b>		
Personality traits	+	+
Idealistic ethical position	+	+
Relativistic ethical position	-	-
High anxiety	+	0
High distrust	+	+
Source of power	-	-
Locus of control	+	N/A
Moral intensity	+	+
Trust investigation	+	N/A
Machiavellianism	+	+
Age	0	+
Male	0	0
Female	0	0
Experience	0	0
Ethics training	N/A	+
Perceived responsibility	+	+
Perceived cost	0	0
Perceived seriousness	N/A	+
Perceived organizational support	+	+
Positive attitude	+	+
Perceived behavioural control	+	+
Auditor's independence	+	0
Professional commitment	+	0
Performance	+	+
<b>[2] Recipient:</b>		
Anonymous	0	0
Internal Hotline administrator - safeguards	0	0
Powerful recipient	+	N/A
Negative outcome	-	N/A
Likeability	+	N/A
<b>[3] Wrongdoing:</b>		
Evidence	+	+
Materiality/seriousness	0	+
Assets misappropriation	+	N/A
Financial Reporting Frauds	0	-
Insider trading	+	+

<b>[4] Wrongdoer:</b>		
Work performance	-	N/A
Likeability	-	N/A
Powerful supervisor	-	N/A
co-worker	+	N/A
strong organizational response	+	N/A
Close working relationship with the wrongdoer	-	N/A
Knowledge of the fraud	-	N/A
<b>[5] Organisation:</b>		
Formal reporting structures	+	0
Training	+	0
Legislative protection awareness	0	0
Rewards	0	+
wage level	+	N/A
Ethical environment	+	N/A
Financial sub-certification	-	N/A
Organisational justice	+	N/A
Strong organisational response	+	N/A
whistleblowing program	+	N/A
<p>In the context of examining whistleblowing intention, the symbols used have specific interpretations to represent the associations between different factors and the intention to blow the whistle: “+” denotes a positive association, indicating a factor that encourages or positively influences whistleblowing intention; “-” signifies a negative association, suggesting a factor that acts as a deterrent or negatively influences whistleblowing intention; “0” represents mixed evidence or no significant association, implying that the factor may not have a strong impact on whistleblowing intention based on the available data; “N/A” indicates insufficient evidence to summarize any association, requiring further investigation or data to draw meaningful conclusions.</p>		
For more details have a look at the attached Excel Sheet	 Microsoft Excel Worksheet	

**QFC Regulatory Authority: Bilal Elsaem-PHD Student- internship programme outline**

The aim of this internship is to assist Mr. Elsaem in his PHD research which aims at understanding how the whistleblowing process takes place in practice at the organisational level in the Regulatory Authority.

**Day 1: Policy**

- Introduction to Policy, role of policy development, whistleblowing rules, public consultations and production of final rules.

**Day 2: Enforcement**

- Introduction to the whistleblowing Scheme, whistleblowing internal and public rules.
- WB statistics (2017-2021)
- Understanding investigation process
- Sharing some (WB cases)/practical

**Day 3: Supervision & Authorisation**

- Introduction to Supervision, types of firm’s RA supervise.
- How to deal with WB referral (during RAV etc)

<b>Date</b>	<b>Time</b>	<b>Location</b>	<b>Department</b>
8 February 2021	10-11 AM	Via Teams	Policy
8 February 2021	11:30-12:30 PM	Via Teams	Enforcement
15 <sup>th</sup> February 2021	9:30-10:30 AM	Via Teams	SUP&AUTH

## Appendix 5: Interview questions

### **Background:**

- How/why did the QFCRA decide to have a whistleblowing policy?
- How did the QFCRA assemble the whistleblowing policy?
- How has the whistleblowing policy been communicated/introduced in the QFCRA?
- What is the whistleblowing policy intended to achieve?
- Can you please explain what are the procedure/process of whistleblowing in the QFCRA?
- How do you understand the whistleblowing policy and react upon?

### **Enactment:**

- Who is a powerful person?
- Would you report powerful wrongdoer person? Why?
- If a person reports the whistleblowing case through official channel, how does a person make sure that he/she is not known?
- What are provisions to help/reassure whistleblowers to report cases?
- If person is not easily identified, how he/she be trusted?
- Whistleblowing is only effective when the whistle is blown and when the whistleblowing allegation is properly investigated and addressed. In your opinion, how can the whistleblowing report be credible when the given channel is anonymous?
- What are the difficulties/challenges in investigating anonymous whistleblowing?
- What are the resources entailing in investigating whistleblowing report?
- Do explicit protection terms from retaliation activate implicit threats of reprisal?
- What are the resources entailing in protecting the whistleblowers?
- If you have a personal/professional relationship with a wrongdoer person, would you blow the whistle against him? Why?
- What are the events that justify whistleblowing? why?
- What possibility do you have to blow the whistle? and why?
- Can you please explain the procedure you would follow to blow the whistle against these evets?

### **Effects:**

- What are the implications of whistleblowing for the internal control?
- What are the implications of whistleblowing for the internal audit and auditing procedure?
- What are the implications of whistleblowing on accounting and accountability?
- How does the whistleblowing policy affect the way people behave?
- How does the whistleblowing policy affect/define the relationships among people in the QFCRA?
- Did the current whistleblowing policy help to deter people from frauds/wrongdoings/corruption? Explain.
- What are the effects of retaliation on whistleblowers as well as an organisation in the long run?
- If you have an opportunity to develop a whistleblowing policy, what would you do differently?
- Do you believe Symbolic or substantive? Why?

Appendix 6: Observations		
Observation no.	Participant	Describe observation
1.	Participant 8	Fear of career repercussions and the perception of whistleblowing as detrimental can lead employees to quit rather than report wrongdoing.
2.	Participant 11	His strong commitment to his job is evident as he has a personal interest in its success through owning shares.
3.	Participant 11	With dedication to his work, he rescheduled the interview no less than 7 times to ensure it aligns perfectly with his professional commitments.
4.	Participant 11	In the pursuit of exceptional client service, the interview was momentarily paused on 5 occasions to address pressing matters with valued clients.
5.	Participant 7	Great emphasis and attentive focus were dedicated to discussing the OECD policy both over the phone and during informal conversations.
6.	Participants 2	Provided support and assistance to fellow researchers in the field of whistleblowing.
7.	Participants 4	Provided valuable support and guidance to fellow researchers in their exploration of whistleblowing.
8.	Participants 3	During informal conversations, it became apparent that there is a need for better coordination and collaboration between QFC (Qatar Financial Centre) and QFCRA (Qatar Financial Centre Regulatory Authority). The existence of two separate reporting channels was seen as redundant and inefficient, resulting in increased costs.
9.	Participants 6	Informal conversations revealed that QFC and QFCRA have complementary functions, but having two reporting channels is costly and inefficient. Streamlining the system is necessary.
10.	Participants 7	During informal conversations, it was noted that QFC and QFCRA collaborate effectively, but the existence of two reporting channels proves to be costly and less efficient. There is a need to streamline the process for improved effectiveness.
11.	Participant 10	Despite constantly facing pressure and experiencing a lack of promotion, there is a growing sense of dissatisfaction towards his work. Feelings of frustration and anger have emerged as a result.
12.	Participant 7	The expressed disappointment stems from the participants' lack of willingness to take action.

## Appendix 7: Consent Forms

### The enactment of a whistleblowing policy: a processual approach to the study of practice at the Qatar Financial Centre Regulatory Authority (Consent Form)

<i>Please tick the appropriate boxes</i>	Yes	No
<b>Taking Part in the Project</b>		
I have read and understood the project information sheet dated DD/MM/YYYY or the project has been fully explained to me. (If you will answer No to this question please do not proceed with this consent form until you are fully aware of what your participation in the project will mean.)	<input type="checkbox"/>	<input type="checkbox"/>
I have been given the opportunity to ask questions about the project.	<input type="checkbox"/>	<input type="checkbox"/>
I agree to take part in the project. I understand that taking part in the project will include being interviewed / recorded (audio).	<input type="checkbox"/>	<input type="checkbox"/>
Please tick this box if you agree to be interviewed only <input type="checkbox"/>		
Please tick this box if you agree to be interviewed and recorded (audio) <input type="checkbox"/>		
I have the right not to answer any questions they are asked and can withdraw from the research at anytime.	<input type="checkbox"/>	<input type="checkbox"/>
I understand that my taking part is voluntary and that I can withdraw from the study at any time; I do not have to give any reasons for why I no longer want to take part and there will be no adverse consequences if I choose to withdraw.	<input type="checkbox"/>	<input type="checkbox"/>
<b>How my information will be used during and after the project</b>		
I understand my personal details such as name, phone number, address and email address etc. will not be revealed to people outside the project.	<input type="checkbox"/>	<input type="checkbox"/>
I understand and agree that my words may be quoted in publications, reports, web pages, and other research outputs. I understand that I will not be named in these outputs unless I specifically request this.	<input type="checkbox"/>	<input type="checkbox"/>
I understand and agree that other authorised researchers (supervisors) will have access to this data only if they agree to preserve the confidentiality of the information as requested in this form.	<input type="checkbox"/>	<input type="checkbox"/>
I understand and agree that other authorised researchers may use my data in publications, reports, web pages, and other research outputs, only if they agree to preserve the confidentiality of the information as requested in this form.	<input type="checkbox"/>	<input type="checkbox"/>
I understand and agree that the researcher will store the data on the university google drive and Email protected by a highly secured password. The researcher will use only his laptop. The researcher will dispose of the data after six months.	<input type="checkbox"/>	<input type="checkbox"/>
I give permission for the interviews and observation notes that I provide to be deposited in the University of Sheffield so it can be used for future research and learning	<input type="checkbox"/>	<input type="checkbox"/>
<b>So that the information you provide can be used legally by the researchers</b>		
I agree to assign the copyright I hold in any materials generated as part of this project to The University of Sheffield.	<input type="checkbox"/>	<input type="checkbox"/>

Name of participant [printed] \_\_\_\_\_ Signature \_\_\_\_\_ Date \_\_\_\_\_

Name of Researcher [**Bilal Ahmad Elsalem**] \_\_\_\_\_ Signature \_\_\_\_\_ Date \_\_\_\_\_

**Project contact details for further information:**

If you would like to contact the researcher regarding any issues, please feel free to E-mail him at [baelsalem1@sheffield.ac.uk](mailto:baelsalem1@sheffield.ac.uk). If you have any questions or concerns regarding how this research was conducted, please feel free to contact the researcher's supervisors in the university of Sheffield email Professor Jim Haslam: [j.haslam@sheffield.ac.uk](mailto:j.haslam@sheffield.ac.uk); and Postgraduate Research Administrator Mrs Mandy Robertson's email: [M.Robertson@sheffield.ac.uk](mailto:M.Robertson@sheffield.ac.uk)



## QFC Regulatory Authority Consults on New Draft Rules Protecting Whistleblowers in QFC Authorised Firms

**Doha, Qatar, 6 November 2017** - The QFC Regulatory Authority has released a consultation paper containing proposals to introduce protected reporting rules for QFC authorised firms. Protected reporting is often called whistleblowing.

The proposed legislative framework relates to making confidential reports about alleged wrongdoing by QFC authorised firms or persons connected with such firms. Anonymous reporting mechanisms help foster a climate whereby employees are more likely to report or seek guidance regarding potential or actual wrongdoing without fear of retaliation from their employer, such as immediate termination or ongoing harassment on the job. Protected reporting is an important tool for identifying wrongdoing in financial institutions.

"The introduction of protected reporting requirements will assist both authorised firms and the Regulatory Authority in the early identification of potential wrongdoing," said Michael Ryan, Chief Executive Officer of the QFC Regulatory Authority. "The proposed Rules provide appropriate mechanisms for confidentiality, anonymity and protection for persons making reports."

The QFC Regulatory Authority developed the protected reporting framework in accordance with best practice international standards, including those set out by the Organisation for Economic Co-operation and Development.

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PRESS RELEASE

PRESS RELEASE



## Page 2

The consultation period is open until 21 January 2018. The consultation paper and draft Rules are available on the website of the QFC Regulatory Authority at [www.qfcra.com](http://www.qfcra.com).

The Regulatory Authority will review all comments received and anticipates that the Rules will commence in April 2018.

The proposals support the Regulatory Authority's commitment to the maintenance of high international regulatory standards for financial services and the continuing development of the QFC as a leading financial and business centre in the Middle East.

ends

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E: [b.richman@qfcra.com](mailto:b.richman@qfcra.com)

### About the QFC Regulatory Authority

The QFC Regulatory Authority is an independent regulatory body established by Article 8 of the QFC Law. It regulates firms that conduct financial services in or from the QFC. It has a broad range of regulatory powers to authorise, supervise and, when necessary, discipline firms and individuals. The QFC Regulatory Authority regulates firms using principle-based legislation of international standard, modelled closely on that used in major financial centres. Further details are available on the website [www.qfcra.com](http://www.qfcra.com)

PRESS RELEASE

PRESS RELEASE



**PROPOSED PROTECTED REPORTING (“WHISTLEBLOWING”)  
AMENDMENTS RULES**

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**November 2017**  
Consultation Paper 2017/03

## Contents

1.	Introduction .....	4
2.	Proposed draft Rules amendments to General Rules 2005 .....	5
<b>Attachment 1:</b>	Proposed draft General (Protected Reporting) Amendments Rules 2017	

### PROPOSED PROTECTED REPORTING ("WHISTLEBLOWING") AMENDMENTS RULES

#### Invitation to comment

The QFC Regulatory Authority ("Regulatory Authority") seeks public comment on policy proposals to introduce protected reporting (i.e. "whistleblowing") rules for QFC Authorised Firms. The proposals are set out in the General (Protected Reporting) Amendments Rules 2017 ("the draft Rules" (see **Attachment 1**)).

The proposals build on the existing statutory provisions for whistleblowing under Article 16 of the QFC Employment Regulations and other related requirements in the State of Qatar's Criminal Procedures Code (Law No. 23 of 2004). These proposals also reflect recent developments in international regulatory standards and best practices for whistleblowing frameworks.

The proposals support the Regulatory Authority's commitment to the maintenance of high international regulatory standards for financial services and the continued development of the QFC as a leading financial and business centre in the Middle East.

Please submit your comments by **21 January 2018** including contact details for the organisation represented, to:

Policy Department  
QFC Regulatory Authority  
PO Box 22989  
Doha  
Qatar

Or email to: [ConsultationPapers@qfcra.com](mailto:ConsultationPapers@qfcra.com)

These proposals are relevant to all QFC authorised firms.

In accordance with its statutory objectives, it is the Regulatory Authority's policy to make all responses to formal consultation available to the public. Respondents who would like their submission, or part of their submission, to remain confidential should provide this information marked as confidential. A standard confidentiality statement in an email message will not be regarded as a request for non-disclosure.

### 1 Introduction

- 1.1 Analysis of academic literature, international regulatory jurisdiction requirements and best practice guidelines<sup>1</sup> recognises protected reporting as an important tool for identifying wrongdoing in financial institutions. The Regulatory Authority believes that strengthening the existing QFC whistleblowing framework<sup>2</sup> through the introduction of specific requirements for Authorised Firms will assist both Authorised Firms and the Regulatory Authority in the early identification of potential wrongdoing. The Regulatory Authority recognises that some QFC firms may already have protected reporting arrangements in place as a matter of good practice, although implementation may differ among firms. The introduction of protected reporting requirements for all Authorised Firms will result in a consistent framework that is in line with best practice principles.
- 1.2 The Regulatory Authority also intends to publish guidance for Authorised Firms and whistleblowers on the processes and procedures that it will follow in the event it receives whistleblowing reports under the draft Rules.
- 1.3 The Regulatory Authority is proposing that the draft Rules will commence in April 2018.
- 1.4 This Consultation Paper contains the following attachment:

**Attachment 1:** Proposed draft General (Protected Reporting) Amendments Rules 2017

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<sup>1</sup> The G20 and the Organisation for Economic Co-operation and Development have published a range of reports and best practice guidelines on whistleblowing frameworks.

<sup>2</sup> Article 16 of the QFC Employment Regulations deals solely with the case of employees making whistleblowing reports about QFC firm employers. It describes whistleblowing as the act of "any person who in good faith raises concerns about or reports crimes, contraventions (including negligence, breach of contract, breach of law or requirements), miscarriages of justice, dangers to health and safety or the environment and the cover up of any of these by their Employer". Article 16 continues: "..... shall not be dismissed or otherwise penalised directly or indirectly for such acts, including in respect of any prohibition against disclosure of non-public information".

**2 Proposed Rule amendments**

- 2.1 Best practices for protected reporting frameworks typically provide appropriate mechanisms for confidentiality and protection for persons making reports. The Regulatory Authority proposes to incorporate those mechanisms in the protected reporting framework and in this regard, the draft Rules contain the following key elements:
- a Definitions of protected report and protected reporter;
  - b Requirements to establish a protected reporting policy that:
    - i Is approved by the firm's governing body;
    - ii Is communicated to all its employees;
    - iii Offers protections to protected reporters through anonymity, confidentiality and measures against retaliation;
    - iv Recognises the right of the protected reporter to communicate with the Regulatory Authority;
    - v Provides for the acknowledgment, assessment, investigation, escalation and conclusion of the protected reporting process; and
    - vi Provides for the outcomes of those processes to be communicated to the protected reporter;
  - c Implementation of the protected reporting policy requires Authorised Firms to:
    - i Nominate a senior individual to oversee the implementation of the policy;
    - ii Notify the Regulatory Authority of protected reports received by the Authorised Firm;
    - iii Review the policy at least every three years;
    - iv Regularly train staff on the policy and applicable procedures; and
    - v Appropriately deal with any outsourced elements of the policy.
- 2.2 The draft Rules are designed to be appropriate to the nature, scale and complexity of Authorised Firms. In that connection, firms will be permitted to outsource their protected reporting functions subject to appropriate oversight. For authorised firms that are branches, group whistleblowing policies may be adopted if the group policy substantially complies with the Regulatory Authority's protected reporting requirements.

END

Enforcement  
Protected reporting "Whistleblowing"

Qatar Financial Centre Regulatory Authority

Protected reporting "Whistleblowing"

The Regulatory Authority is responsible for the operation of the PR framework, in addition to providing support to an AF's relevant independent function. The Regulatory Authority requires that all AFs also have a PR framework in place.

Qatar Financial Centre Regulatory Authority

Protected reporting "Whistleblowing"

- Enforcement is responsible for recording, allocating, monitoring and reporting all whistleblowing reports received by the Regulatory Authority under General Rules ("GENE") 'protected reporting' framework.
- The scheme has been established since 2017 and now it is managed by Enforcement team.

Qatar Financial Centre Regulatory Authority

Meaning of protected report and protected reporter

- Protected reporting is often called whistleblowing. The maker of such a report is often (but not necessarily) an employee of the firm concerned.
- Protected report** means a report that meets all of the following requirements:
  - Breaches of any law or regulations, regulatory directives or statutes (whether in the QFC, Qatar or another jurisdiction);
  - All forms of financial malpractice or impropriety, potential fraud and corruption;
  - Improper conduct or unethical behaviour;
  - Health and safety risks, including risks to the public as well as to the employees;
  - A breach of a QFC authorised firm's policies and procedures (including, for example, a breach of any code of conduct or policy in relation to ethical behaviour); and
  - Attempts to conceal any of the above.

Qatar Financial Centre Regulatory Authority

Who should report?

Any person (**Protected reporter**) can report a concern of known or suspected misconduct regarding a QFC authorised firm or a person connected with a QFC authorised firm.

Qatar Financial Centre Regulatory Authority

How to make a Protected Report to the Regulatory Authority?

- Through Website (web portal)
- Through Email
- Through a Letter

Qatar Financial Centre Regulatory Authority

### Management of Protected Reporting

Action Description	Actions by Regulatory Authority
Acknowledgment	The Regulatory Authority will, if able to, acknowledge all reports.
Determining if the "protected report" is within the scope	Upon receiving the report, the Regulatory Authority will determine whether the report is within the scope. If the matters reported do not fall under the scope, the report will be classified as "Out of Scope". The Regulatory Authority may refer such out of scope matters to the respective QIC firm for their actions. However, the Regulatory Authority will maintain the confidentiality of the reporter while restoring the matter to the firm.
Assessment and Investigation of protected reports	The Regulatory Authority will carry out investigations of all protected reports of its discretion considering the severity of the reported matters and whether the matters reported involve victimization or retaliation.
Feedback	The Regulatory Authority will provide feedback about initiating a review and completion of investigation to the protected reporter unless they are unable to contact the protected reporter or such feedback will be detrimental to the investigation or the QIC.

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### Protecting the protected reporter

A protected reporter is assured of the confidentiality of the information provided and is protected from any reprisal or victimisation.

**Confidentiality**  
The case manager will keep confidential the identity of a protected reporter and the information provided, unless required by law or as a necessary part of the investigation process.

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### No Victimization or Retaliation

- The Regulatory Authority will not tolerate any sort of harassment, victimisation and retaliation towards a protected reporter; towards anyone who assists in investigating a protected report; and towards anybody who cooperates with the investigation.
- Such harassment, victimisation or retaliation is prohibited: see the *General Rules 2005 (GENE)*, Chapter 4A.

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### Whistleblowing ("WB") - Key Statistics

Stage in WB Process	1 Jan 31 December 2018	1 Jan 31 December 2019	1 Jan -31 December 2020
Enquiries to WB (whether in or outside jurisdiction)	2	6	10*
Out of scope matters	1	0	3
WB matters under assessment	0	0	4*
WB matters closed	1	6	3

\* Includes one matter started over from 2019  
\* Includes one matter carried over from 2019

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Thank You

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## WHISTLEBLOWER REPORT E-FORM

**REPORTER'S CONTACT INFORMATION**

(This section may be left blank if the reporter wishes to remain anonymous, however we encourage you to share your contact details so that we may seek further information or provide feedback during the course of review)

<b>Reference No</b> <input type="text" value="E-WB-2023-26"/>	<b>Name</b> <input type="text"/>
<b>Designation</b> <input type="text"/>	<b>Department</b> <input type="text"/>
<b>QFC Firm</b> <input type="text" value="-- select QFC Firm Name / الشركة العاملة في مركز قطر للمال --"/>	<b>Contact Number</b> <input type="text"/>
<b>Email Address</b> <input type="text"/>	



### SUBJECT INFORMATION

(The person or persons against whom you are making allegations)

**Name**

**Designation**

**Department\***

**QFC Firm\***

**Contact Number**

**Email Address**

### WITNESS INFORMATION

Information on any other person or persons who also witnessed or has information relating to the disclosed reported misconduct

**Name**

**Designation**

**Department**

**QFC Firm**

**Contact Number**

**Email Address**

### COMPLAINT

Briefly describe the misconduct/improper activity and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation.

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(Please provide the name of the firm for which the named individual worked at the time of the alleged misconduct.)

**2. What misconduct/improper activity occurred? \***

**3. Who committed the misconduct/improper activity? \***

**4. When did it happen and when did you notice it? \***

**5. Where did it happen?\***

**6. How was the misconduct/improper activity able to occur? Were there controls in place to prevent the activity?**

(If there were controls in place, how were they circumvented?)

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**7. Do you have any documents or evidence that support your report or explain it in more detail which you would be able to provide us?**

**8. Have you reported this misconduct to your employer/QFC firm? YES or NO**

Yes

**9. If the matter has been reported previously, please confirm when the report was made, to whom it was made, whether it was made in writing and what actions, if any, have been taken?**

**10. Are there any other parties involved in the alleged misconduct? If so, please provide their names and positions.**

**11. Let us know if we should be aware of any circumstances during the course of the inquiry. For example, if a certain individual is conflicted and should not be assisting in the inquiry.**

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**Attachments**

Upload

**Declaration**

I hereby declare that all information provided herein is true to the best of my knowledge and that all documents provided with this report are true and accurate copies of the originals.

I understand that the QFC Regulatory Authority will use the information provided in this report to investigate the matters disclosed in the report in accordance with the applicable rules, policies and procedures.

By pressing the "Submit" button below, I consent to the processing by the QFC Regulatory Authority of my personal data set out in this report.

I'm not a robot reCAPTCHA  
Privacy - Terms

Submit

**ATTACHMENT 1**

PROPOSED RULES PUBLISHED FOR COMMENT UNDER  
ARTICLE 15 (4) OF THE FINANCIAL SERVICES REGULATIONS



**General (Protected Reporting)  
Amendments Rules 2017**

**QFCRA Rules 2017-**

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The Board of the Qatar Financial Centre Regulatory Authority makes the following rules, and gives the following guidance, under the *Financial Services Regulations*.

Dated [ ] 2017.

Chairman

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PROPOSED RULES PUBLISHED FOR COMMENT UNDER  
ARTICLE 15 (4) OF THE FINANCIAL SERVICES REGULATIONS



## General (Protected Reporting) Amendments Rules 2017

QFCRA Rules 2017-

made under the  
*Financial Services Regulations*

### Contents

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Page

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VCP2

General (Protected Reporting) Amendments Rules 2017

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PROPOSED RULES PUBLISHED FOR COMMENT UNDER  
ARTICLE 15 (4) OF THE FINANCIAL SERVICES REGULATIONS

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**1 Name of rules**

These rules are the *General (Protected Reporting) Amendments Rules 2017*.

**2 Commencement**

These rules commence on *[insert date]*.

**3 Amendment**

These rules amend the *General Rules 2005*.

**4 Explanatory notes**

An explanatory note in these rules is not part of these rules.



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## Schedule 1 Amendments

(see r 3)

### [1.1] After Chapter 4

*insert*

## Chapter 4A Protected reporting

### Part 4A.1 General

#### 4A.1.1 Introductory

This Chapter provides a framework for making confidential reports about alleged wrongdoing by authorised firms or persons connected with such firms. Protected reporting is often called whistleblowing. The maker of such a report is often (but not necessarily) an employee of the firm concerned.

#### 4A.1.2 Meaning of *protected report* and *protected reporter*

(1) In this Chapter:

*protected report* means a report that meets all of the following requirements:

- (a) it is made in good faith;
- (b) it is about an authorised firm or a person connected with such a firm;
- (c) it is made to the firm itself or an authority specified in rule 4A.1.2 (3);
- (d) if it is made to an authority, the authority is responsible for matters of the kind reported;
- (e) it gives information that the reporter believes shows that any of the following has happened, is happening, or is likely to happen:
  - (i) a criminal offence (whether under the law of Qatar or of another jurisdiction);

PROPOSED RULES PUBLISHED FOR COMMENT UNDER  
ARTICLE 15 (4) OF THE FINANCIAL SERVICES REGULATIONS

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- (ii) a contravention of a relevant requirement, or a failure to comply with a legal obligation of another kind;

*Note* For contravention of a relevant requirement, see FSR, article 84.

- (iii) the putting in danger of the health and safety of an individual;
- (iv) a breach of an authorised firm's policies and procedures (including, for example, a breach of any code of conduct or policy in relation to ethical behaviour);
- (v) the deliberate concealment of a matter referred to in any of subparagraphs (i) to (iv).

***protected reporter*** means an individual who makes a protected report.

**Guidance**

Nothing in this Chapter requires that a protected reporter be an employee of the authorised firm about which the report is made.

- (2) For this Chapter, a report is made in good faith only if the individual who made it believes on reasonable grounds that it is true.
- (3) For this Chapter, a report with the characteristics set out in the definition of *protected report* in subrule (1) is a protected report whether it is made to:
  - (a) the authorised firm concerned;
  - (b) the Regulatory Authority;
  - (c) an officer of the State to whom crimes may be reported under Law No. (23) of 2004, or whose responsibilities include the matters that are referred to in the report; or
  - (d) a regulatory or governmental authority, body or agency in a jurisdiction outside the QFC (whether in Qatar or not), including a body or officeholder responsible for enforcing the criminal law of the jurisdiction.

**4A.1.3 Reports to be treated as protected until contrary established**

- (1) An authorised firm that receives a report that purports to be a protected report:
  - (a) must treat the individual who made the report as a protected reporter; and
  - (b) must treat the report as a protected report;until the firm has decided, on the basis of a proper investigation, that the report is not a protected report.
- (2) Subrule (3) applies if an authorised firm becomes aware that an individual has made a report that purports to be a protected report about the firm to an authority specified in rule 4A.1.2 (3).
- (3) The firm must treat the individual as a protected reporter until the firm establishes that the report is not a protected report.

**Guidance**

- 1 The firm might establish that the report is not a protected report by asking the authority to which the report was made.
- 2 Subrules (2) and (3) are intended to deter a firm from retaliating by, for example, altering the terms of its business with a client to the client's disadvantage.

**Part 4A.2 Protected reporting policies**

**4A.2.1 Obligation to have protected reporting policy**

- (1) An authorised firm must establish a written policy on protected reporting that:
  - (a) is approved by the firm's governing body;
  - (b) complies with this Part; and
  - (c) is appropriate for the nature, scale and complexity of the firm's business.
- (2) An authorised firm that is a branch, or is a member of a corporate group, may rely on a group-wide protected reporting policy, or the

PROPOSED RULES PUBLISHED FOR COMMENT UNDER  
ARTICLE 15 (4) OF THE FINANCIAL SERVICES REGULATIONS

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protected reporting policy of its head office, provided that the policy substantially complies with this Part.

**4A.2.2 Content of protected reporting policy**

(1) An authorised firm's protected reporting policy must comply with all of the following requirements:

(a) it must provide 2 or more independent channels for making a protected report;

**Guidance**

For example, a firm's policy could provide both a dedicated email address and a dedicated telephone number to which reports can be made.

(b) if appropriate, it must provide for such a report to be made in a language other than English;

(c) it must recognise that such a report could be made by anybody with the necessary information (not only by an officer or employee);

(d) it must allow a protected report to be made anonymously;

(e) it must provide for the identity of a protected reporter to be kept confidential (so far as possible);

**Guidance**

The Regulatory Authority recognises that the investigation of a protected report may reveal the identity of a protected reporter or make it possible to infer it.

(f) it must provide for reasonable measures to protect a protected reporter, anyone who assists in investigating a protected report, and anyone who cooperates with the investigation, against retaliation;

(g) it must explicitly recognise a protected reporter's right (and, in certain cases, obligation) to report to or communicate with the Regulatory Authority, another regulator or an authority of the State;

*Note 1* Under the Criminal Procedures Code of the State (Law No. (23) of 2004), article 32, a person who has knowledge of certain crimes must report it to the State Prosecutor's Office or a judicial commissioner.

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*Note 2* For the firm's obligation to cooperate with the Regulatory Authority, see rule 1.2.14.

- (h) it must provide a suitable set of guiding principles, and clear processes, for the assessment, investigation and escalation of a protected report;
- (i) it must provide for the investigation of a protected report to be independent of the individual or business unit concerned;

**Guidance**

This could include making arrangements for the investigation to be done by a third party.

- (j) it must provide for a protected report to be acknowledged, and for the protected reporter who made it to be kept informed about the progress and outcome of the investigation;
  - (k) it must provide for the reporting, monitoring and investigation of retaliation, attempts at retaliation and threats of retaliation;
  - (l) it must provide for retaliation, an attempt at retaliation, or a threat of retaliation to be treated as gross misconduct;
  - (m) it must provide for appropriate reporting to the firm's governing body and the Regulatory Authority about protected reports, the investigation of such reports and the outcome of the investigations.
- (2) The firm must set out the policy clearly in a document, and must ensure that all of the firm's officers and employees have access to, and understand, the document.
  - (3) The document must also clearly set out statements of:
    - (a) the benefits to the firm of the protected reporting policy; and
    - (b) the firm's commitment to it.

**4A.2.3 Implementation of protected reporting policy**

- (1) The senior management of an authorised firm must ensure that the firm's protected reporting policy is fully implemented.
- (2) In particular, the firm's senior management must take reasonable steps to ensure that a protected reporter, anyone who assists in

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investigating a protected report, and anyone who cooperates in the investigation, are protected against retaliation.

*Note* Under the *Employment Regulations* of the QFC, article 16, a person “...who in good faith raises concerns about or reports crimes, contraventions (including negligence, breach of contract, breach of law or requirements), miscarriages of justice, dangers to health and safety or the environment and the cover up of any of these by their Employer shall not be dismissed or otherwise penalised directly or indirectly for such acts, including in respect of any prohibition against disclosure of non-public information.”.

**Guidance**

- 1 Retaliation or an attempt at retaliation against an employee who has made a report referred to in the *Employment Regulations*, article 16, would therefore be a contravention of a legal requirement (see rule 4A.1.1 (1), definition of *protected report*, paragraph (b)), and could itself be the subject of a protected report.
- 2 Also, see FSR, article 84 (1) (B)—retaliation against such an employee would contravene article 16 of the *Employment Regulations*, thus is a contravention of a relevant requirement, and could therefore give rise to disciplinary or enforcement action under FSR, Part 9.
- 3 However, article 16 protects only employees; this Chapter requires anybody who makes a protected report to be protected against retaliation.

- (3) An authorised firm must nominate an appropriately senior individual to oversee the implementation of the firm’s protected reporting policy.

**Guidance**

The individual nominated need not be an employee or even a board member, but could for example be a legal adviser in an outside law firm.

- (4) An authorised firm that receives a protected report must notify the Regulatory Authority within 5 business days.
- (5) An authorised firm’s governing body must ensure that the firm’s protected reporting policy is reviewed at least once every 3 years by:
  - (a) the firm’s internal auditor; or
  - (b) an independent and objective external reviewer.
- (6) An authorised firm must provide regular training for all of its officers and employees on its protected reporting policy and the applicable procedures. In particular, the firm must provide appropriate specialist

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training for the officers and employees who are responsible for key elements of the policy.

- (7) An authorised firm may outsource the implementation of its protected reporting policy. If the firm does so, it must ensure that the outsourcing agreement:
- (a) nominates the individual referred to in subrule (3); and
  - (b) otherwise provides appropriately for the implementation of the firm's obligations under the policy.

*Note* For outsourcing in general, see the *Governance and Controlled Functions Rules 2012*, Chapter 5.

**Explanatory note**

This amendment inserts a new Chapter dealing with protected reporting (often called whistleblowing).