

Effect of System Factors on Whistleblowing Attitude of Nigerian Banks Employees: A Conceptual Perspective

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Abstract— Whistleblowing provides a self-correcting mechanism for an organization to prevent unethical practices. Lessons from collapsed businesses around the world show that organisations do not just collapse, but rather it is a gradual process resulting from a series of inappropriate acts left un-addressed. This paper is based on a conceptual perspective. Past studies on whistleblowing were reviewed, gaps and weaknesses identified to develop a conceptual framework on whistleblowing reporting attitude of bank employees in Nigeria. The conceptual framework is anchored on the Resource Dependence (RD) and Planned Behaviour (PB) theories. The paper provides important lessons for promoting ethical practices in organisations and the society at large. Based on the gaps in literature, this paper recommends among others a performance review system that is tied to rewarding whistleblowing; ways to protect whistleblowers and the need to strengthen organizational support structures for whistleblowing. **Keywords**—component; formatting; style; styling; insert (key words)

I. INTRODUCTION

There are several stakeholders involved in the running of a corporation, with varying interests, but common to their objectives is the sustainability of the organisation. The employees play critical role in ensuring this objective, and as such cannot afford to watch helplessly while the business is about to disintegrate. Hence they act as watchmen and whistleblower. Corporate frauds and other unethical practices have devastating effects on most stakeholders, as observed in the case of Enron and Arthur Andersen. Employees lose their jobs, shareholders lose their investments and governments lose tax revenue, while the communities lose potential social benefits. Similarly, an employee who brings a potentially hazardous product to the attention of management before it is introduced to consumers, saves the organisation from potential lawsuit and a damaged reputation. In this context, the employee has a duty to ensure the organisation's sustainability is not jeopardised.

KPMG [1] report on Instances of Fraud In Organizations in Europe, Middle East and Africa shows that anonymous tipping by employees was the primary source of detection. A comparison of experiences with other countries revealed a missing link in Nigerian organisations' war against serious wrongdoing. Whistleblowing deters misconduct within institutions by increasing the possibility of uncovering immoral, illegitimate and illegal practices and punishing its perpetrators. By promoting transparency of information

exchange in organisation's dealings, whistleblowing brings out in the open unethical practices that are well-hidden and enhances the chances of successful prosecution of wrongdoings. Unfortunately, employees often stay silent, due to a number of reasons, which may include the fear of retaliation, apathy, lack of faith in the system, absence of incentive, lack of protection and support [2]. Nigeria's cultural orientation discourages subordinates from questioning authority. Consequently, organisations need to encourage employees who suspect wrongdoing to take an action that would lead to a halt of the wrongdoing. Upon this premise, this paper seeks to develop a conceptual perspective for examining the relationship between system factors and whistleblowing attitude among employees in Nigerian banks.

A review of literature on whistleblowing revealed a pattern of researchers' focus on issues that involve organisations and whistleblowing. Some of these studies include the work of [3] which focused on the myth and reality of whistleblowing; [4]'s work on whistleblowing in organisations; [5] on meta-analysis of correlates of intentions, actions and retaliation; [6] on influence of reporting channel. These studies observed practices in developed countries thereby ignoring the cultural influence and developmental status relevant to a country like Nigeria. The few studies available in Nigeria include the works of [2] on the fight against corruption; [7] on effects of whistleblowing practices on organisational performance in public sector; [8] on the need for whistleblowing awareness in corporate Nigeria and on the role of accountants in whistleblowing. A general trend of the studies is a focus on why individuals do not blow the whistle, but no study has researched into what factors influence whistleblowing attitude of Nigerian bank employees.

The Central Bank of Nigeria (CBN), in an attempt to improve governance in banks recently introduced the requirement for banks to establish whistle-blowing procedures that encourage all stakeholders to report any unethical activity or breach of the corporate governance code using, among others, a special email or hotline to both the bank and the CBN. This represents the first mandatory initiative for whistleblowing in Nigeria, which has not been considered in available studies. Conceptual models developed in whistleblowing studies have looked at antecedents to the behavioural intention, and the actual behaviour without

considering the influence of post-behavioural evaluation [4]. Specifically, the study aims to (i) identify the relationship between moral sensitivity and employees' satisfaction in whistleblowing; (ii). Analyse the relationship between job characteristics and employees' commitment toward whistleblowing; (iii). Examine the role of organisational culture and ethical climate on employees' loyalty for whistleblowing; (iv). Evaluate the relationship between leadership and employees' trust to encourage whistleblowing; and (v). Review the relationship between support structures and employees' perceived reward toward whistleblowing.

The findings of this paper are useful to the banking industry, academia, and other industry managers in identifying the predictors of reporting intention. This helps in implementing appropriate measures to strengthen the positive factors affecting whistleblowing intentions. This paper contributes to contemporary academic research on whistleblowing by offering insights into factors that promote and hinder whistleblowing intention in the Nigerian context, by going beyond the psychological factors researched extensively in the past, and by applying the cultural lens in understanding employees' behavioural intention. By promoting whistleblowing culture, the organisation is able to forestall losses and other risks. Findings from this paper will also assist government executives (in formulating policies to support whistleblowing culture); legislature (in drafting and passing whistleblowing bills); and the judiciary (in protecting whistle-blowers); and finally, the general public benefits by understanding the concept and practices of whistleblowing, and how it helps the organisation in particular, and the society in general.

II. CONCEPTUAL FRAMEWORK

A. *The Concept of Whistleblowing*

A common definition of whistleblowing is 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' [9]. There must be a genuine concern about a crime, criminal offence, miscarriage of justice, dangers to health and safety and of the environment – and the cover up of any of these. Whistleblowing is not the same as a complaint, as customer services or other relevant departments in an organisation handle complaints.

Whistle-blowers have a sense of moral standards which passionately drives them over and above other considerations in making a decision on whether to blow the whistle or not [10]. Despite their intent to protect the public good, whistle-blowers are at times viewed negatively and seen as disloyal or disgruntled employees.

An attitude can be defined as a "learned predisposition to respond in a consistently favourable or unfavourable manner with respect to a given object" [11]. Attitude has been studied from cognitive and experiential perspective. It may also be formed based on an individual's beliefs about consequences from behaviour, or evaluations of consequences from behaviour. Behavioural attitude can be viewed from the possible behavioural inclination of an individual [12]. It refers

to the strength of a person's conscious plans to perform the target behaviour. Therefore, whistleblowing refers to an individual's likelihood to report on observed wrongdoing, which in his/her judgment is immoral, illegitimate or illegal. Whistleblowing behaviour therefore refers to the actualisation of the whistleblowing attitude. While whistleblowing intention does not always lead to whistleblowing behaviour, intentions when correctly measured could predict actual behaviour.

Whistleblowing behaviour can be reported internally or externally, while the whistle-blower can choose to report formally, or informally, and to be anonymous or identified [13]. Internal whistleblowing is usually defined as reporting wrongdoing outside the regular chain of command via, for example, confidential hotlines [4]. External whistleblowing refers to reporting wrongdoing to someone outside the organization who may be able to stop or correct it. Most external whistle-blowers first blow the whistle internally [4, 14] as the latter is less risky for the whistle-blower [15] and also less detrimental to the organization. In contrast, external whistleblowing may lead to public embarrassment, government scrutiny, hefty fines, and litigation [16] as it not only exposes internal wrongdoing, but also a failing organization – one which is unable to stop and correct wrongdoing itself. External whistleblowing is considered more effective than internal whistleblowing [17] because it often sparks investigations or other remedial actions by the organization, [18], however external whistle-blowers suffer more severe retaliation. Although internal whistleblowing poses less threat than public scrutiny resulting from external whistleblowing, it is often not welcome [5] and is frequently ignored [19]. Therefore, the choice of an internal or external channel will prompt different results –in form of threat, benefit and reaction to the whistle-blower, the organisation and society.

Benefits of whistleblowing

Despite several key developments in the Nigerian banking sector, the same symptoms of financial recklessness, unethical practices and weak corporate governance [20] are still characteristics of the industry. CBN in response has introduced a code of corporate governance practices for banks post-consolidation, including a mandatory whistleblowing policy among others.

Whistleblowing provides several benefits to the individual, organisation, and the society. For the individual, s/he emerges as an agent of change, with a sense of achievement and satisfaction on the remediation of a negative course of event. The employee thus acts as a partner in ensuring the sustainability of the organisation. The organisation benefits by prevention or termination of fraud, corruption, illegal and illegitimate activities, which reduces exposure to risk, losses and legal action. Also, the shareholders' confidence is increased, while the organisation's image of being responsible is enhanced. In summary, the reputation of the organisation (one of the most important assets it has) is kept intact. An organisation that loses its reputation quickly disintegrates (see Enron, Arthur Andersen). Whistleblowing promotes public good, and a safer society. Nigeria as a country for instance, stands to benefit from whistleblowing as an anti-corruption tool through efficient allocation of resources, preservation of

national wealth, and improved well-being of the citizenry. These benefits lead to positive perception, improved ratings in global indices, and ultimately the attraction of foreign investors.

System Factors

An organisation is an interconnected and interdependent system with several feedback circles, and can best be analysed in how it responds to internal and external forces. Interaction in organisations involve people, culture, processes, structure, technology, institutions, and government among others. To study whistleblowing attitude of employees, it thus makes sense to consider the factors surrounding the organisation as a system. These factors may be individual-related (such as moral sensitivity); job-related (such as job characteristics); and the organisational environment (such as organisation culture and climate, leadership, and support structures). Analysing system factors thus helps us to understand why people behave as they do.

B. Theoretical Framework

Theory of Planned Behaviour (TPB)

TPB [12] holds that the human behaviour is guided by three types of considerations: (i). Behavioural beliefs- beliefs about the likely outcomes of the behaviour and the evaluations of these outcomes, (ii). Normative beliefs - beliefs about the normative expectations of others and motivation to comply with these expectations, and (iii). Control beliefs-beliefs about the presence of factors that may facilitate or impede performance of the behaviour and the perceived power of these factors. These beliefs produce respectively, attitudes toward the behaviour (which may be favourable or unfavourable), social pressure or subjective norm, and perceived behavioural control. The underlying assumption of the TPB theory is that intention is the immediate determinant of behaviour, even though studies have shown a weak relationship between intention to act and the actual performance of a behaviour [21]. It however suffices for our study of whistleblowing attitude among employees. The TPB has been used by several researchers in the study of behavioural attitude and intention – For instance, “how consumers view green hotels” [22]; academic-entrepreneurial intention [25]; fertility intentions [24]; predicting sleep intentions and behaviour of undergraduate college students [23] among others.

Based on the TPB, whistleblowing behaviour will be directly influenced by the employee’s attitude towards whistleblowing. Attitude is formed by various factors such as moral sensitivity, beliefs, background among others. The subjective norm emphasises the influence of peers and significant others (i.e. reference groups) in forming a whistleblowing intention. This leads to the employee’s motivation to comply with the expectations of the reference group. Perceived control (the third and last component of TPB) which is defined as the perception of a person of the ease or difficulty of performing the act of interest [12] is suitable in this paper because a potential whistle-blower needs to consider the personal cost of reporting, the fear of retaliation, possible loss of job etc. before taking a decision to blow the whistle. The TPB is however limited in explaining fully the

whistleblowing decision-making process, as it completely ignores the influence of institutional structures, and environmental factors, as well as the power play in organisations.

Resource Dependency Theory

The Resource Dependency Theory [26] views organisation in a cyclic process with three major points- every organisation needs resources to survive and this leads to interdependence; interdependence leads to uncertainties; and in order to reduce uncertainty, organisations form coalitions, pool resources and change their strategy to survive. These coalitions (or claimants) can be both internal and external, with each claimant having some power over the organisation based on their resources. This power may be in form of possession of resources, control of the use of resources, and or regulating the possession of critical resources. The underlying assumption therefore is that resources are controlled by some parties, who are in turn depended on by other members. The theory has been used in various studies – corporate governance [27], whistleblowing [28]; power base in churches [54] among others.

Organisations are dependent on a number of key players for needed resources, which in turn leads to power relations within the organisation. Powerful employees in an organisation are in a better position to influence the organisation (management) to terminate wrongdoing. Thus, employees with more experience, tenure, and better job performance may be considered more valuable to an organization, thus giving them some leverage to report misdeeds [15]. Conversely, organisations may find it difficult to take action against powerful employees, where they are the ones involved in the wrongdoing, especially in a corrupt organisation or organisation of corrupt individuals [29]. The organisation may therefore consider it beneficial to dispense with the whistleblower rather than the valued and powerful employee. Consequently, a potential whistle-blower may be forced to assess his/her power base, either over the wrongdoer, or over the organisation before making a whistleblowing call. Where they lack the power to change unethical practices, they may have to rely on informal power such as external whistleblowing channel, which may damage the organisation’s reputation. Alternatively, they may exit the organisation, carrying along experience and knowledge valuable to the organisation. For effective whistleblowing therefore, organisations need to recognise the less powerful employees, and treat their whistleblowing reporting seriously, as it may be meritorious, or carry a potential reputation risk.

III. METHODOLOGY

This study is based on a conceptual framework. A structured approach was used to determine the source of materials for review. The peer-reviewed literature was the main source of information and data about whistle-blowing attitude. In addition, we consulted with other materials outside the main scope of the subject database. Different literature were reviewed to identify gaps and weaknesses in the literature so as to develop a conceptual framework for encouraging employees in whistle-blowing.

A. Empirical Framework Based On Specific Objectives

Proposition 1: Moral sensitivity has a positive effect on employees' satisfaction in whistleblowing attitude.

Moral sensitivity is critical towards forming an attitude about a wrongdoing [30,31], and therefore whistleblowing intentions. It can be moulded by several factors such as religious beliefs, family background, demographic factors, peer influence, and cultural orientation. An employee needs to consider how easy or difficult it is to form an attitude through its moral intensity [32]. Demographic characteristics of the employee play important role in forming an intention - For instance, on gender, women are assumed to have a greater moral burden than men, while men are perceived to take more risks [21]; and [33]; on age, older employees are assumed to have acquired greater moral sensitivity than younger employees as a result of having dealt with more moral conflicts situation at work and non-work setting. Lee [52], [33]Heilmann and Near, 2004; Zhang et al., 2009); and on tenure, employees that have stayed longer in an organisation tend to have more attachment to the organisation[52,39,33]. Influence of peers and the employee's significant others also have effect on shaping the employee's moral sensitivity.

The type and severity of wrongdoing; magnitude of consequences, probable effects, and the status of the wrongdoer also influence the employee's moral sensitivity, and therefore have significant implications in the decision to blow the whistle [5,3,34,32]. A morally sensitive employee therefore will attempt to cleanse his conscience by reporting unethical practices, knowing that his action will bring a termination of the wrongdoing, and enhance the sustainability of the organisation. This gives the employee a sense of achievement and a moral victory for helping to bring a culprit to book. The employee's satisfaction may both come from extrinsic (such as recognition) and intrinsic values, such as making employees feel effective in their roles that they can positively influence organisational outcomes [35].

Proposition 2: Job characteristics has a positive effect on employees' commitment toward whistleblowing attitude.

Job characteristics here refers to the employee's job status, satisfaction, performance, growth, and achievement orientation. It is assumed that the high level of unemployment in Nigeria tends to ensure employees value job security and do all within their legitimate capacity to retain their highly remunerative jobs. An average banker has financial responsibility, not only towards his immediate family, but also the extended family members. The high remuneration and other job characteristics stimulate increased job satisfaction [36] and increased job performance [35]. High flyer employees [5], and those with great "attachment to the organisation are also known to exercise the whistleblowing behavioural intention" [3].

Another dimension of job characteristics relates to the employee's role responsibility (also called personal reporting responsibility), which refers to the degree to which a potential whistle-blower has a formally prescribed responsibility to report. Employees such as internal auditors, compliance officers, external auditors, ethics officers etc. for instance see

whistleblowing as their role responsibility and are more likely to blow the whistle than employees assigned to non-compliance related work. Miceli[15] found a positive correlation between those who view whistleblowing as part of their role description, and that such individuals consider their action to blow the whistle as more effective because of the perceived role responsibility.

In Nigerian banks, employees with compliance function as their role description are generally perceived as "policemen", whose motive is to "nail" employees in the organisation. They are "not to be trusted or confided in". They are also generally frowned at, as employees tend to tip-toe around them, or shut-off conversations on sighting them. By job definition, they are considered the first line of defence against wrongdoing, and it is not uncommon to find these officers belonging to professional associations guided by rules and regulations. They are therefore considered to have a responsibility as a watchdog to protect the organisation against wrongdoing, which in turn is driven by their commitment to live up to the organisation's expectations. Their commitment comes from their perception of compatibility of interests and values with the organisation; sense of belonging and obligation; feeling of job satisfaction; and the belief of being engaged in a fair economic exchange [53].

Proposition 3: Organisational culture and ethical climate has a positive effect on employees' loyalty for whistleblowing attitude.

Organisational culture and climate focus on how employees perceive, experience, and make sense of their work environment [37]. They are important concepts in describing and analysing organisational phenomena [38] such as whistleblowing in this study.

There is a consensus that individuals in organizations with strong organisational culture, and ethical climates are more likely to engage in whistle-blowing when they observe a wrongdoing [39,14,33]. One way of providing a friendly and transparent atmosphere is through Perceived Organizational Support (POS), which refers to "employees' perception concerning the extent to which the organisation values their contribution and cares about their well-being. POS has been found to have important consequences on employee performance and well-being" [40].

Employees who have managerial or supervisor support [31, 18, 5] are more likely to ignore inhibitions such as the fear of retaliation, fear of loss of job, and status of the wrongdoer because they perceive the organisation to be responsive to complaints [41], which in turn encourage loyalty to the organisation.

Another way of promoting an ethical climate is through the provision of ethical codes and guidelines in the organisation. An ethical code is a "distinct and formal document containing a set of prescriptions developed by and for a company to guide present and future behaviour of its managers and employees toward one another, the company, the external stakeholders and /or society in general with the purpose of removing ethical ambiguity and providing clear direction for ethical conduct". Jones [42] found that managerial responses to ethical decisions

are influenced by the ethical stance of the organization. Pimentel [43] highlighted the role and significance of organisational ethics – compliance to codes of conduct.

An organisation that provides a friendly and transparent atmosphere will encourage employees' loyalty. The employee holds the duties of loyalty and confidentiality to his employer, and therefore whistleblowing in an ethical climate is an act of loyalty. Furthermore, since an organisation's goal is to maximise profit, whistleblowing and loyalty serve the same goal, which is the moral good of the employer.

Proposition 4: Leadership has a positive effect on employees' trust to encourage whistleblowing attitude.

An ethically strong leadership helps to project the organisation's values, create an ethical climate, and foster value alignment. Relevant characteristics of an ethical leader include, identified support for others, honesty, personal accountability, and fairness to others. Beenen[29] described the lack of ethical leadership in explaining the corruption in Enron. According to [44], corruption may be institutionalised by the organisation for its benefit (i.e. Corrupt Organisation), or perpetuated by key figures for personal benefits (i.e. Organization of Corrupt Individuals). Eseoghene [45] identifies "greed, lack of personal ethics and weak corporate governance as managerial factors that help propagate frauds in Nigerian banks; and for which top management should be held responsible". An antidote to a pervasive culture of unethical practices is strong ethical leadership. Employees who serve under ethical leaders are able to build trust in the judgment of the leaders, and the organisation at large. Their trust is derived from the concept of organisational justice [46], which relates to a perception of fairness: "of the outcome that an employee receives; of the procedures used to determine those outcome allocation decisions; and of communications or interpersonal treatment that accompanies organisation formal procedures".

Proposition 5: Support structures has a positive effect on employees' perceived reward toward whistleblowing attitude.

We describe support structures to include professional codes, functional judicial system, organisational ownership type, national culture and cultural orientation.

Employees belonging to professional associations, such as the Nigeria Bar Association (NBA), Institute of Chartered Accountants of Nigeria (ICAN), Nigeria Medical Association (NMA) etc. subscribe to the association's codes, which generally promote ethical behaviour among members.

While the whistleblowing culture is yet to be rooted in Nigeria, ICAN established a N50million Whistle-blower Protection Fund to protect its members and the public from any form of reprisal when a wrongdoing is reported. The fund is also aimed at assisting whistle-blowers in reasonably incurred litigation expenses [47]. While the amount may appear low, and the modalities for drawing from the fund may not be attractive to employees, it creates a motivation of a perceived reward for members to disclose wrongdoing in the organisation.

A functional judicial system also serves as an incentive for employees, especially where there are statutes protecting the

whistle-blower. Organisational ownership type also influences employees in whistleblowing intentions. While corporate governance policies and procedures are known to be weak or non-existent in Micro Small and Medium Enterprises (MSMEs) in Nigeria, and therefore whistleblowing may not be formally instituted as a company policy, yet, an employee will be motivated to report unethical practice knowing that the business owner desires a sustainable organisation. The recent introduction of a mandatory whistleblowing policy in Nigerian banks is an incentive for employees to report wrongdoing, more so the policy makes room for anonymous reporting. A positive cultural orientation also influences the employee's morality and judgment.

Pay may make employees remain in an organisation because of mutual dependence, but add-on benefits establish foundation for richer form of commitment by creating dependence [36]. A reward system that consists of pay, and add-ons serves as a motivation for an employee's commitment, and influences future decision-making. An organisation that expects a certain behaviour must consider a reinforcement of the behaviour. This is in line with the social learning theory, which posits that past decisions impact future decision-making.

B. Hindrances to whistleblowing practice in Nigeria

Notwithstanding the desirability and benefits of whistleblowing, we provide below some of the hindrances and suggestions for organisations:

i. Fear of retaliation

While the highly-ethical employees may perceive whistleblowing as the right course of action in the interest of others, quite a number of others see it as an act of betrayal, snitch, or "dissent that challenges an organization's authority structure and creates animosities" [9]. Consequently, whistle-blowers face a significant risk of retaliation, even when their disclosure benefits the organization. External whistle-blowers appear to experience more retaliation than internal ones [5]; [18]; [48]. Retaliation is also more common when the organisation is dependent upon the wrongdoing or when it is not dependent upon the whistle-blower. Retaliation takes several forms, including harassment, isolation of employee, changed responsibilities, poor performance evaluation and termination [49]. Studies therefore show that employees who fear a threat of retaliation are less likely to report a wrongdoing [3], and this may also affect others' willingness to blow the whistle in the future [50].

In Nigeria, the lack of statutes on whistleblowing plus the weak institutions (legal and political) constitute a huge hindrance for potential whistle-blowers. Considering research findings that corroborate retaliation on whistle-blowers, an average employee is likely to consider self-preservation first before other considerations. Legislation, and organisation policies providing assurance and support for whistle-blowers will therefore help in promoting whistleblowing culture.

ii. Social stigma – Snitch, "amebo" "tatafo" are some of the terms reserved for whistle-blowers, hence most employees would rather avoid the negative tag. Employers need to educate staff on the cost of keeping quiet, as an unreported singular

case may turn out to be a monster in the near future threatening the existence/sustainability of the organisation.

iii. Cost of reporting – The cost of reporting includes the potential for a lawsuit by the wrongdoer, the distraction or nuisance value of providing evidence, and time for interview/questioning. Organisations should have personnel policies pronouncing stiff sanctions for employees who keep silent in the face of a serious wrongdoing, and reward for whistle-blowers (e.g. reimbursement of whistleblowing cost, legal services etc.). Providing valued employer rewards for internal whistle-blowing would increase its frequency. More importantly, organisations should consider implementing performance review systems that specifically assess employee reporting of questionable activity through appropriate channels and reward systems that provide incentives for valid whistleblowing.

iv. Fear of job loss – This may result from the supervisor not approving the whistleblowing plan of the junior staff, or the high unemployment rate-induced fear. Organisations should have policies allowing employees to by-pass their supervisors in order to report wrongdoing. Employees' jobs should also be guaranteed against threats for reporting wrongdoing.

v. Absence of company policies and procedures – Employees may not know what to do, or what processes to follow in reporting wrongdoing. This is more so in organisations without whistleblowing policies and procedures. Organisations should therefore have documented policies and procedures.

vi. Lack of education – This may manifest in the form of not knowing what to report. It could also be related to lack of knowledge on how to gather quality evidence to support the reporting. Employers should provide training to all workers to ensure that they are familiar with the organisation's whistleblowing arrangements, and additional training to individuals whom they appoint as recipients and investigators of concerns.

vii. Absence of support – This may come from management, co-workers, or significant others. The organisation needs to show support to the whistle-blower and reward successfully established cases.

IV. CONCLUSION

Whistleblowing has proved to be a useful tool in exposing wrongdoing in other countries, yet the cultural factors, weak institutions, and other external environmental factors have limited the whistleblowing practice in Nigerian banks. This study concludes that: (i). The employee plays a critical role in preventing and, or exposing unethical practices. (ii). A culture of keeping silent risks the sustainability of the organisation (iii). Influencing behavioural change towards whistleblowing requires strengthening the system factors – moral sensitivity, job characteristics, leadership, culture and climate, and support structures. (iv). Employees' attitude can be positively influenced when benefits of whistleblowing become apparent. (v). Policy makers have a critical role in enacting supporting

statutes and strengthening the judiciary towards promoting whistleblowing.

This conceptual framework examined the whistleblowing decision-making process, and thereby provides opportunities for organisations to identify the predictors of reporting intention with a view to implementing appropriate measures to strengthen the variables positively affecting whistleblowing intentions, while at the same time adopting appropriate measures to address the hindrances to whistleblowing practice.

A. Recommendations

Whistleblowing on wrongdoings in organisations is critical in preventing scandals, crises, corporate frauds etc. To develop a roadmap for whistleblowing culture in Nigerian banks, an advocacy campaign is a first step in creating awareness and sensitising employees to the benefits of whistleblowing.

ii. Employers need to educate staff on the cost of keeping quiet, as a threat to the sustainability of the organisation; develop personnel policies pronouncing stiff sanctions for employees who keep silent in the face of a serious wrongdoing, and reward for whistle-blowers; implement performance review systems that specifically assess employee reporting of questionable activity through appropriate channels; and provide training to all workers on whistleblowing arrangements, and investigations of concerns.

iii. Organisations should implement the whistleblowing culture by first designating a few employees as whistleblowing champions, using the diffusion of innovation model propounded by [51].

iv. Government executives and policy makers need to drive a positive attitude towards whistleblowing by introducing legislations, as well as providing societal and organisational support structures for whistleblowing (such as a functional legal system, responsive regulatory bodies, and national code of conducts etc.). Other supports include the role of the mass media, training on documentation of evidence, and a reward system for whistle-blowers.

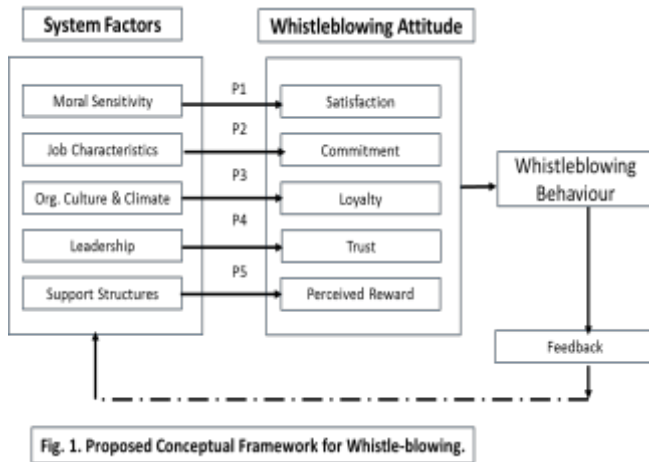
v. By promoting a whistleblowing culture in the society at large, whistleblowing can improve Nigeria's Corruption Perception Index, with multiplier effect on other indices such as Human Development Index, Doing Business Report, and Global Competitiveness Index among others. Improvement in these indices has huge potentials to open up investment opportunities (be it Foreign Direct Investment or Foreign Portfolio Investment).

vi. Education is an important tool to shape the cultural orientation towards a desired goal. To this extent, it is recommended that ethics should be incorporated in Nigerian school curricular.

vii. From our review of literature, no study considered feedback as a variable to influence whistleblowing intention and behaviour. This study considers feedback as a construct which can be measured by reward system, correction program, and communication.

B. Expected Contribution to Knowledge

Based on the review of literature and the gaps identified, this research expects to contribute to knowledge by developing a model for encouraging employees in whistleblowing. The Framework (Fig. 1) is built on constructs and variables propositioned in this study, which applied the cultural lens to the study of bank employees.



C. Limitations and Future Research Directions

A limitation of the conceptual framework proposed is in the methodology adopted in this paper. Our review of literature is impacted by the few studies on whistleblowing in Nigeria, being a practice in its infancy. We thus had to rely on empirical findings from other countries, which may not approximate the local conditions, especially considering the role of cultural influence and weak institutions.

ii. Researchers have used whistleblowing intention as a proxy for understanding the actual behaviour. This limitation is accounted for, by the challenges of carrying out investigations into unethical conduct in actual organizations (Chiu, 2003), censored information by whistle-blowers to protect the confidentiality or anonymity of their organisation, finding whistle-blowers for interview, and inherent biased data generated from such exercise. These limitations invariably call for caution in attempting to generalise the inferences from the conceptual framework.

iv. Future research may focus on (a). Empirical studies of intention and actual behaviour, (b) Studies of whistleblowing in different industries, and sectors (public versus private sector) (c). Effect of organisation's location and community culture on whistleblowing (d) Test of alternative theories – for instance institutional theory, organisational justice theory – on whistleblowing.

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