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RESEARCH ARTICLE



Whistleblowing behaviours and anti-corruption approaches in public administration in Kenya

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ABSTRACT

This article demonstrates that whistleblowing often receives little attention in public administration due to ambivalence regarding administrative roles held by public administrators, the fluid scalar chain and horizontal linkages, and competitive and intricate public, organisational and private interests. Drawing on comparative analysis to elucidate the broader scope of anti-corruption reforms and whistleblowing in public administration, the article explores the influence of the administrative culture on the relationship between whistleblowing behaviours and implementation of anti-corruption reforms in public administration in Kenya. It illustrates how bureaucratic oversight mechanisms such as internal auditing procedures and ethical guidelines tend to underperform where administrative environments largely feature autocratic bureaucratic authority, parochial management styles and centralised decision-making processes. Despite the functional speciality of public institutions, these cultural composites potentially elicit administrative behaviours that generally make whistleblowing anti-organisational, anti-social and an outright illegality in public administration. The absence of whistleblowing legislation or weak whistleblowing laws exacerbate these conditions. Whistleblowing becomes even more complex at the local-state level as social networks and working groups tend to be strengthened by the collectivist associational culture in public administration. Consequently, non-performance of anti-corruption reforms were found to stem from the collective chastisement of whistleblowing practices in public organisations in Kenya. Furthermore, institutional deficits typical in local-state administration seemingly made it riskier for potential whistleblowers to come forth, mainly attendant to loose and inconsistent legislation on corruption. Therefore, to enhance whistleblowing, there is a need to insulate potential whistleblowers from legal retaliation, including cultural retaliations that come in forms of emotional and professional 'attacks'.

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Introduction

This article stems from general efforts to discern public integrity and ethics in public administration, particularly in the context of the global south. Using a case study of anti-corruption structures and whistleblowing behaviours in public administration in Kenya, the paper endeavours to draw implications that will arouse broader interest for scholars in public administration and public accountability. In so doing, whistleblowing is understood as ‘disclosures by organisation members of matters of “public interest” [or institutional interest] – that is, suspected or alleged wrongdoing that affects more than the personal or private interests of the person making the disclosure’ (Brown 2008, xxi). Conversely, anti-corruption approaches or strategies refer to both institutional and extra-institutional processes and initiatives targeted at addressing and controlling corrupt practices and behaviours, and moderating systems within bureaucratic and societal contexts. As much as these anti-corruption efforts focus on the conduct of public officials, they have also been designed to stimulate anti-corruption behaviours within the environments of public bureaucracies. This is to enhance citizen oversight and to transform generalised societal norms and cultures, which may otherwise rationalise or normalise corruption in public administration.

It is commonplace that anti-corruption reforms come with the establishment of institutions and the formulation of public norms and values. Institutions such as anti-corruption bureaus, an Ombudsman, and oversight committees that are mandated to enforce the adoption of and compliance with ethical guidelines, conduct training, collaborate cross-institutionally and perform community sensitisation provide some illustrations. Some of these anti-corruption approaches may explicitly direct and encourage whistleblowing, while others may present ambiguity, leaving individual public entities to draft their own policies on whistleblowing (Onyango 2017). Whistleblowing behaviours can either be externally channelled, i.e. to oversight agencies, or internally channelled, i.e. to utilise internal bureaucratic oversight mechanisms and chain-of-command to disclose witnessed misconduct (Near and Miceli 1996). In linking whistleblowing behaviours and anti-corruption strategies, this article sets off by first identifying gaps in whistleblowing in public administration. In so doing, it addresses, albeit hypothetically, compliance and public integrity problems in the global south, where anti-corruption reforms have become (or may be) primary public accountability reforms in public bureaucracies. Despite such efforts, however, existing studies on anti-corruption reforms reveal sporadic or temporal successes and permeating failures in most countries in the region (Persson, Rothstein, and Teorell 2013).

Such policy or reform outcomes have often been tied to the problem of behavioural discrepancies in public administration. Analyses of the problem of behavioural discrepancies between norms and values in public administration have commonly revolved around cultural variables (Jamil, Askvik, and Hossain 2013). African public bureaucracies are confronted with insurmountable challenges, which arguably emanate from the effects of their cultural contexts on the functioning of public institutions (political or administrative). Rational biased analyses commonly argue that these institutions are largely reliant on communal rather than rational institutional logics, leading to the *normalising of waywardness* in public institutions (Odhiambo-Mbai 2003; Olivier de Sardan 2013; Hyden 2013). In other words, these cultural structures curtail effective

bureaucratic processes and erode oversight and controls at all levels of government (Olivier de Sardan 2013). Therefore, understanding the attendant intricate socio-political and economic synergies is relevant in understanding public ethics and in the analysis of corruption and problems of trust in the global south and Africa in particular.

The focus on whistleblowing behaviours as a composite of anti-corruption reforms in local governments emanates from the fact that public sector reforms often sought in response to the problems of accountability and ethics in local governments commonly complicate rather than reduce problems of public accountability and responsiveness in public administration (Carroll 1989; Grigorescu 2008). Local government reforms frequently come with disruptive consequences and unsettledness in the form of loose accountability and overlaps at the local-state level and between local-state political and administrative units (Onyango 2020a). Additionally, there are correspondingly loose relations between central government institutions, mainly the Ombudsman and anti-corruption agencies, as well as central regulatory ministries with local government structures (Treisman 2002). Therefore, it is without a doubt that in these contexts, and given the steadiness by which some of these public sector reforms (e.g. inter-governmental models) have been adopted in sub-Saharan Africa in the last decades, greater threats to anti-corruption reforms in public administration have unexpectedly arisen (Therkildsen 2001). Inter-governmental models have created unintended institutional blind spots that have mostly consolidated and empowered intricate political citizenry and identity group factions at the local-state level across Africa, and Kenya, in particular (D'Arcy and Cornell 2016). Also, it has featured an increased politicisation of accountability reforms and deficits in organisational discipline in general, thereby negatively influencing the enforcement of anti-corruption legislation (Onyango 2019b). Furthermore, instrumental and cultural complexities and institutional hybridity that come with these reforms broaden the accountability gaps or weaken political and administrative controls and oversight mechanisms in public administration (Grigorescu 2008). As such, local government structures typically take time to enhance administrative efficacies needed for functional anti-corruption mechanisms in public administration.

This article argues that in such anarchical circumstances of reform outputs on public accountability, whistleblowing behaviours can become critical in controlling corrupt behaviours in public administration. However, this is largely contingent on modalities of prevailing administrative culture. That is to say, since whistleblowing is largely behavioural, it relies less on conformity with formal processes, bureaucratic rules and/or oversight controls in public administration and instead draws more on personal traits, levels of organisational citizenry, individual motivations and the integrity of concerned public administrators (Miceli and Near 1994; Van Wart 1996; Cho and Song 2015). Conversely, bureaucratic rules and controls that are central to the objectives of anti-corruption reforms often become easily entangled or overshadowed by institutional complexities and politics in public administration, especially at the local-state level, hence slowing down the promotion of whistleblowing behaviours. At the same time, whistleblowing behaviours do not need to be latched onto efficient administrative structures to take place. All it takes to is to simply blow the whistle as a demonstration instead of goodwill and a concern for integrity by administrators who witnessed a

malpractice (Gelfand, Lim, and Raver 2004; Hwang et al. 2008). Pillay et al. (2018, 187) contend that the ‘imperative, for “principled disclosure of wrongdoing,” which is sometimes considered as an act of loyalty [...] to the organisation and in the public interest, contributes to an effective whistle-blowing culture’. However, several findings show that whistleblowing not only takes a lot of courage from the potential whistleblowers to come forth but it also involves different layers of interpretations and motivations that consequently complicates the whole practice, including the formal and informal processes of addressing the wrongdoing.

The literature on whistleblowing in public administration in developing regions, particularly in Africa, is limited despite increased demands for research and legislation against the prevailing public disobedience and despite the implementation of rather apposite public sector reforms (Schuppan 2009; Onyango 2018b). Public administration has apparently done little to understand ethical decision making on whistleblowing behaviours as anti-corruption mechanisms have become central features in modern public administration over the years. Similarly, general issues that seem to characterise whistleblowing practices in public administration commonly stem from ambivalence in the conception of administrative roles in matters of bureaucratic oversight in public organisations, the fluid scalar chain and loose horizontal linkages. In addition, public administration is animated by conflicting due processes, dissonant organisational justice systems, competitive and intricate public-private and organisational interests. Either way, these characteristics of public administration have been found to complicate enforcement of ethical guidelines and proactive actions on whistleblowing (Zipparo 1998; Brown 2008; Pillay et al. 2018).

Taking cues from this trend while seeking to address the growing interest in discerning the interfaces between whistleblowing and anti-corruption reforms and processes in public administration across the globe, this article adopts a cultural approach – administrative culture – to explore the correlation between whistleblowing behaviours and anti-corruption reforms in the context of Kenyan public service. It is mainly presumed that the primary impediment to the effective functioning of anti-corruption efforts in the public administration of unconsolidated democracies such as Kenya is the lack of effective whistleblowing mechanisms. Extant studies on whistleblowing in sub-Saharan Africa are bound within structural explanations that focus on legislation on whistleblowing, while ignoring microscopic facets that reside in the behavioural or informal dimensions of public administration. In the present discussion, I demonstrate that insofar as common *anti-corruption narratives* in developing countries fail to strengthen whistleblowing behaviours as key institutionalisation repertoires of anti-corruption structures, related accountability reforms are more likely to fail. The studies on whistleblowing concur that the absence of a whistleblowing culture curtails the development of an ethical climate that enhances the self-regulation and individual-responsibility of public administrators (Zipparo 1998; Bowman and Knox 2008).

The approaches by most of these studies underscore the need for effective bureaucratisation of whistleblowing such as by enacting adequate legislation and promoting formalised behavioural variables, i.e. codes of conduct for ethics and integrity in public organisations (Dorasamy and Pillay 2011). Proponents of this line of thought argue that unambiguous administrative legislation and related whistleblowing agencies can

reinforce bureaucratic ethos and the ethical climate needed to institutionalise whistleblowing behaviours in public administration (Zipparo 1998; Kaptein 2011; Dorasamy and Pillay 2011). The absence of this legislation and these agencies exposes whistleblowers to organisational and cultural backlash, namely, retaliatory responses and victimisation, commonly associated with whistleblowing (Zipparo 1998). The administrative culture on whistleblowing in the public bureaucracies of Africa in general and Kenya in particular is, in essence, understudied. However, the utility of administrative culture in this article and corresponding ethnographical data on whistleblowing and anti-corruption practices generally elicit analytical rather than empirical generalisation of administrative contexts in developing countries. The Kenyan case therefore serves as a method rather than as a theory.

Cultural framing of whistleblowing: the utility of administrative culture

Sharma (2002) conceptualises administrative culture as multipronged and multifaceted concept with no universal definition (also cf. Jamil, Askvik, and Hossain 2013). According to Sharma (2002, 65), administrative culture involves 'how administrator acts or behaves vis-à-vis other administrative objects or actors or individuals of the society in administrative capacity'. Thus, administrative culture explains synergic relationships emanating from environmental or ecological and behavioural composites of administration. First, administrative culture involves components of social entity because administration largely entails social relationships and networks. Second, it can be viewed as a function of social norms of groups because administration entails different interests, both societal and political. Third, it is a function of social institutions and a subculture of socio-cultural systems (Sharma 2002). This comes with the promotion of social structures such as power relations, caste systems and beliefs. As such, administrative culture is an elaborate form of organisational culture, consisting of a set of formal and informal governance norms, traditions, and practices taken-for-granted that have spanned over time in the organisational lifecycle, thereby, replicable across governmental and sometimes non-governmental organisations in a particular society (Peters 1990; Jamil 2002; Onyango 2019b).

In describing bureaucratic discrepancies, Olivier de Sardan (2013) uses the term 'practical norms' to loosely refer to such norms, traditions, beliefs and practices in public bureaucracies. Administrative culture is an embodiment of a complex mix of political culture, organisational culture, historical and institutional factors, standard administrative norms and socio-structural composites in public administration. As such, it is multidimensional and entails a layer of normative references or institutional logics that shape and influence dominant perceptions, gatekeepers, attitudes, practices, processes, underlying assumptions, and power relations in public administration (Jamil, Askvik, and Hossain 2013). As it pertains to public sector reforms, administrative culture is most likely to elicit continuity despite a pursuit of change in public bureaucracies (Jamil 2002). For instance, the perpetuity of corruption, despite anti-corruption reforms in developing countries, strongly corresponds to problems of administrative culture in public organisations. Haque and Mohammad (2013) note that dimensions of administrative culture in Bangladeshi public administration in the form

of large power distance or adherence to hierarchy (i.e. autocratic administrative culture), centralisation of administrative processes, abuse of discretionary power, nurturing *tadbir* and sycophancy, correspond to the perpetuity of corruption despite targeted reforms. Similar observations are made by Blundo and Olivier de Sardan (2006) in the case of public bureaucracies in West Africa, which they found to host dimensions of administrative culture analogous to an extensive hierarchy, privilege and kinship structures that, in the end, threaten the efficacy of anti-corruption reforms. According to Onyango (2018a), administrative culture, especially ethnic identity and bureaucratic autocracy in public administration, is bound to hinder individual innovation and inter-agency communication, which can otherwise enhance implementation of accountability reforms in public administration.

Concisely, the study of administrative culture presents a behavioural approach that explains *how things are done instead of how they should be done* in public administration (Jamil, Askvik, and Hossain 2013). It defines the scope of action and ethical decision-making processes emanating from either the *logic of consequences*, i.e. compliance with legal-rational principles, or the *logic of appropriateness*, i.e. based on past experiences subject to cognitive and normative components. March and Olsen (2009, 478), define the logic of appropriateness as the ‘relationship between action and rules, along with the elements of slippage in executing rules, the dynamics of rules, and the standards of appropriateness’. This illustrates the transcendence of informal processes over bureaucratized rules and controls that may assist in identifying cultural variables for whistleblowing in public administration. Merton (1940) argues that these cultural functions are objects of emotionalised disapproval or approval that may enlighten relational dimensions of ethical decision making in public bureaucracies. However, they also interact with bureaucratic processes for effective whistleblowing practices i.e. administrative culture can either promote or hinder whistleblowing efforts, including some of its characteristics that may otherwise seem rationally noxious. Administrative culture, therefore determines the general leeway of action on matters of corruption and anti-corruption behaviours both within and between units, departments and ministries in public administration. Still, apposite bureaucratic mechanisms and professional milieu are needed to foster the institutionalisation of whistleblowing behaviours (Lavena 2016; Zipparo 1998).

Whistleblowing as a function of administrative culture

Linkages of whistleblowing between culture and ethical behaviours in organisations have often revolved around unpacking the complexity of the actions or inactions on organisational wrongdoing (Kaptein 2011; Dyne, Ang, and Botero 2003; Brinsfield 2013). Studies have either looked into how accountability initiatives can foster internal whistleblowing behaviours (e.g. Cho and Song 2015) or why organisational members generally respond to malpractices in the way they do (e.g. Brief and Motowidlo 1986; Lavena 2016). The pursuit of public integrity has also been focussed on organisational processes and strategies for creating ethical culture. Yet, the deepening of ethical culture in public administration has mostly come with designing or redesigning necessary bureaucratic initiatives to foster compliance and whistleblowing behaviours (Dorasamy

and Pillay 2011). Consequently, whistleblowing mechanisms should integrate key anti-corruption strategies such as developing a 'personal code of ethics, using hotlines, having an ethics committee, engaging in periodic ethics training and doing an annual ethics audit' (Perks and Smith 2008, 15). These strategies should align public administrators with legal, professional and organisational ethics hence improving their personal ethical decisions, leading to improved internal whistleblowing processes (Van Wart 1996).

Anti-corruption initiatives draw on the fact that positive attitudes and behaviours on whistleblowing 'can cause substantial changes and facilitate reforms in governmental organisations; [save] people's lives as well as billions of taxpayer dollars' (Cho and Song 2015, 451). Again, whistleblowing should enhance auditing mechanisms in public organisations (Alleynes, Hudaib, and Pike 2013). As such, both cultural and institutional components of administration stimulate a collative whistleblowing culture that should correspond to an improved ethical climate in public administration. Dimensions of administrative culture, especially power distance and hierarchical orientation, define the nature of the organisational leadership and the relationship between managers and their subordinates (Haque and Mohammad 2013). For example, a high possibility of retaliation by the management against whistleblowers discourages whistleblowing behaviours in public organisations (Zipparo 1998; Onyango 2017). Tsahuridu and Vandekerckhove (2008, 107) contend that legislation and policies on whistleblowing may 'either aim to enable individual responsibility and moral autonomy at work, or they aim to protect organisations by allowing them to control employees and make them liable for ethics at work'. This illustrates that whistleblowing may be interpreted as a lack of organisational discipline or may become an anti-organisational and anti-social behaviour, especially when corresponding legislation and procedures are ambiguous in public bureaucracies.

The correlation between administrative culture and organisational leadership and structures on accountability is complex. This is partly because organisational culture itself is as intricate, inconsistent, multilayered and multidimensional as its relationship with the effectiveness of accountability designs in public administration. That is, whistleblowing is contingent on factors that are not analogous to *dominant ways of doing things* in an organisation – individual motivations, values and different interpersonal relationships with groups outside the organisation (Gelfand, Lim, and Raver 2004; Lavena 2016). This implies that there is a knotty relationship between organisational design, culture and environment with respect to ethical decision making. Kaptein (2011) contends that the management's position on ethical or unethical behaviours greatly influences levels of value-congruency in an organisation.

Executive managers can either ease institutional overlaps on whistleblowing or exploit these gaps for personal and organisational interests (Zipparo 1998; Onyango 2019b). Taylor and Curtis (2013) find that 106 senior-level auditors in the United States were influenced by power distance and organisational policy on how they responded to wrongdoing in their departments. Auditors can very easily blow the whistle on their peers but hardly on their superiors, especially 'when prior organisational response is strong than when it is weak' (Taylor and Curtis 2013, 21). Thus,

whistleblowers seem to consider whistleblowing outcomes before deciding to blow the whistle (Near and Miceli 1996). Actually, whistleblowing aftermaths may range from perceived (or actual) retaliatory actions by management to unanticipated effects on organisational interests and the perceptions of superiors and co-workers (Perks and Smith 2008; Alleyne, Hudaib, and Pike 2013). Near and Miceli (1996) simplify these determinants of whistleblowing into two categories: (i) *Situational characteristics*, i.e. quality of evidence, supervisor's support and ethical climate as judged by whistleblowing mechanisms or legislation. (ii) *Personality characteristics*, i.e. job situation and moral behaviour. In retrospect, whistleblowing is explicitly influenced by a mix of cultural, structural and environmental facets of public administration leading to intricate administrative motivations to blow the whistle. I argue that such intricacies can be better discerned within the multidimensional and richly context-specific framework provided by administrative culture.

Anti-corruption strategies and whistleblowing in Kenyan public administration

Despite several sets of anti-corruption strategies and legislation, and despite being one of the few administrative contexts in Africa where anti-corruption strategies seem to be appositely integrated and contextualised in public bureaucracies (EACC 2013–2018), public administration in Kenya is riddled by some of the worst forms of corruption in the world (Persson, Rothstein, and Teorell 2013). And to deal with problems of public accountability, mainly, corruption, Kenya is currently implementing structural devolution reforms for effective participatory, responsive and responsible governing processes. Therefore, as a case study, Kenya presents an accountability paradox and a unique context for investigating the interface between whistleblowing behaviours and anti-corruption mechanisms in developing economies. Moreover, even though whistleblowing in public administration in Kenya is understudied, there are surveys and periodical statutory reports that illustrate instances of whistleblowing in public administration. These reports, however, stress that whistleblowing by public administrators is occasional, uncertain and in most cases anonymised. Oftentimes, this is linked to difficulties involved in enacting effective disciplinary processes in Kenya (Onyango 2019b).

The key strategies for operationalising anti-corruption efforts in public administration in Kenya are embedded in the Anti-Corruption and Economic Crimes Act of 2003 (ACECA), the Public Officer Ethics Act of 2003 (POEA), The Bribery Act of 2015, the Public Service Integrity Programme (PSIP) and other legislation. Although Kenya is yet to develop specific legislation on whistleblowing, the existing legal framework is sufficient for handling whistleblowing incidents. These are cross-cutting mandates within different institutions, including the Commission for Administrative Justice (the Ombudsman), the Ethics and Anti-corruption Commission (EACC) and other oversight institutions. Still, these present critical administrative burdens that frustrate potential whistleblowers who need to be knowledgeable about anti-corruption strategies, specific legislation, procedures and institutions with respect to particular illicit practices. However, this has not been the case. Most public administrators seem to have difficulties in understanding or are not even aware of the POEA and the ACECA,

including distinguishing the functions of the EACC and those of the Ombudsman (EACC 2015; Onyango 2019a).

The mainstream of anti-corruption strategies in Kenyan public institutions integrates the PSIP framework and other public accountability legislation. For instance, through the PSIP's Performance Contracting, government departments identify five key indicators for implementing anti-corruption strategies in public entities as follows.

Strategy 1: developing institutional anti-corruption policies

Under this indicator all public institutions are expected to draft institutional-specific anti-corruption policies. Such a policy should entail a statement that recognises anti-corruption as a risk and acknowledges its occurrence in the institution. This is supposed to create awareness of existing gaps that may cause corrupt behaviours. Additionally, there should be a statement confirming the responsibility of the management, the staff and stakeholders when it comes to addressing corrupt behaviours. This involves a summary of anti-corruption practices in the institution as a guide to its staff, such as corrupt practices in the concerned institution, composition of the corruption prevention committee members, its objectives and operations, the procedures of reporting corrupt practices internally and externally, confidentiality of information provided, and the identity and protection of whistleblowers. However, among other key challenges with the formulation of institutionally specific anti-corruption policies is the problem of principal-agent on oversight structures (e.g. Persson, Rothstein, and Teorell 2013; Onyango 2020b).

Strategy 2: forming corruption prevention/integrity committees

All public institutions are expected to operationalise corruption prevention or integrity committees, as stipulated in the PSIP framework. These committees are supposed to plan and coordinate all anti-corruption strategies by setting up corruption prevention priorities in their institutions. They are required to integrate anti-corruption strategies such as enhancing components of the POEA or ethical guidelines, receiving, reviewing and documenting all incidences of corruption, monitoring corruption trends and evaluating the impacts of existing anti-corruption initiatives. They are also required to write recommendations on the appropriate courses of action, especially by making referrals to concerned agencies, in addition to championing anti-corruption initiatives within the institution. To remain active, these committees are required to meet every three months with clear records of minutes for effective supervision by the EACC.

Strategy 3: developing a corruption prevention plan

The corruption prevention plan (CPP) 'must incorporate clearly set SMART (i.e. *Specific, Measurable, Assignable, Realistic* and *Time-bound*) objectives and targets to be met. This includes, activities and sub activities to be implemented, desired outputs/outcomes to be achieved, clear and subjectively verifiable indicators for monitoring progress and evaluating results, clear responsibilities for implementation and resource requirements' (EACC 2007, 4). The CPP should carry out corruption risk assessments, identify blind spots in systems, procedures and practices and recommend ways of countering such deficiencies. Most importantly, the CPP is supposed to conduct its

institution's Corruption Risk Assessments to understand possibilities of exposure, opportunities and discretionary powers that may curtail existing controls and favour corruption. As such, the CPP should also identify persons and allocate timelines for implementing anti-corruption strategies.

Strategy 4: developing specific codes of conduct

In line with the POEA, all public institutions are required to draft specific codes of conduct. This should contextualise abstractions of the POEA to regulate unique dimensions of some professional fields in public administration. The formulated ethical code is binding to the Board of Directors of concerned institutions, the management and staff. However, the POEA still remains the main point of reference.

Strategy 5: appointing and training integrity assurance officers

Despite their contexts of operation, public institutions are required to train Integrity Assurance Officers (IAOs). IAOs are expected to offer technical assistance to the management and assist in the implementation of the PSIP. They are supposed to liaise with the EACC and relevant ministries, e.g. the Ministry of State for Public Service, to conduct sensitisation programmes for the staff. In other words, IAOs should be at the forefront in promoting an ethical climate for whistleblowing behaviours in public organisations (EACC 2007).

By design and default, the PSIP can hardly escape the principal-agent problems on oversight structures in public bureaucracies, the inevitability of conflicting inter-organisational relations between the centralised oversight institutions and local government oversight mechanisms, and the problems of bureaucratic identity and political citizenry in governmental organisations at all levels. Its emphasis on a stewardship approach to the integration of the PSIP presumes particular levels of ethical awareness and concerns among public and political administrators who would, therefore, commit to the realisation of anti-corruption norms. However, evidence of administrative behaviours and accountability in Kenya indicate a problematic culture animated by intricate political characteristics that limit bureaucratically biased approaches like the stewardship approach (Odhiambo-Mbai 2003).

In fact, despite the above-mentioned integrative strategies for the PSIP in Kenya, studies, especially by the EACC and the Commission for Administrative Justice (CAJ), indicate prevailing whistleblowing deficits in all sectors of government. Such factors as ignorance of procedures (50.5%), fear of victimisation (21.7%), inaction after whistleblowing both internally and externally (20.9%) and inadequate proof of allegations have been identified as the key impediments to whistleblowing in Kenya (EACC 2015, 14–15). EACC (2015) also finds that only 5.3% of people who witnessed corruption blew the whistle as opposed to 94.7% who resorted to silence. However, in 2013, whistleblowing enabled the EACC to handle 26% of bribery cases and 25% of abuse of office; besides, embezzlement of public funds accounted for 18%, irregular public procurement 8% and fraudulent acquisition and disposal of public property accounted to 10% (EACC 2013).

Again, evidence shows that whistleblowing behaviours in Kenya are common on malpractices by low- and mid-level administrators as opposed to those on senior public

managers (Onyango 2017). The hierarchical positioning and role specialisation of public administrators, therefore, influence patterns of whistleblowing in Kenya and potentially determine the viability or performance of external mechanisms in the public sector. Yet this ubiquitous nature of whistleblowing behaviours is also quite evident as incidences in Kenya generally underscore that contingencies such as fear of victimisation, inaction on malpractice, lack of confidence in accountability mechanisms and ignorance of related procedures and processes are key determinants of whistleblowing behaviours in most bureaucratic contexts (Miceli and Near 2002; Kaptein 2011). As such, it is not unusual that difficulties with creating effective whistleblowing mechanisms in Kenya are as much related to bureaucratisation and rationalisation deficits, as they are with complex informal processes and culture in public administration. In fact, this may explain why whistleblowing insufficiently discloses some of the most bureaucratically protracted malpractices related to public procurement in Kenya. For example, in Kenya reports by the Auditor General point out that misappropriation of public funds at both central and local governments mostly stem from the weak and covert public procurement procedures. The same alludes to a problematic administrative culture that seemingly facilitates rather than condemns corrupt behaviours in Kenya. This administrative culture is reportedly biased towards bureaucratic autocracy and ethnic solidarity, parochial bureaucratic identities, personalised administrative processes and politicised administrative relations (Odhiambo-Mbai 2003; Onyango 2019b).

Methodology

This study draws from both primary and secondary qualitative data collected between January 2015 and May 2016 in three county governments in Kenya. Primary data involve in-depth interviews, informal conversations and administration of questionnaires to purposefully and randomly selected departmental and middle-level county administrators in Migori, Kisumu and Nairobi counties of Kenya. Migori and Kisumu counties are selected because of their proximity to the researcher and resource limitation. They also present viable contexts for testing variations in administrative culture between rather consolidated complex administrative structures of Kisumu County (which was until 2013 the provincial headquarters of the Migori district) and administrative structures of Migori County. Nairobi County is the headquarters of the CAJ, EACC and Transparency International-Kenya. Due to the very centralised administrative structure, some information is only found at the headquarters of the CAJ and EACC located in Nairobi, including the permission to interview the staff of these institutions in their regional offices. Interviews are conducted with specific departmental heads and unit leaders of oversight agencies. The unit and departmental heads in the concerned oversight agencies are formally referred by the management of the agencies upon granting the researcher the permission to interview the staff.

A total of 77 respondents, aged between 35 to late 50s, participate in the study. In-depth and face-to-face interviews involve 28 mid-level and senior public officials, including the staff of oversight institutions. Both structured and unstructured interview guidelines are used. Most of these interviews last for at least an hour. The remaining respondents answer unstructured questionnaires, which are administered with the help

of two research assistants in Kisumu and Migori counties. These respondents sign research consent forms before interviews and filling in the questionnaires. These forms clearly stipulate the research topic and objectives and confidential information on security of their identities.

Oversight agencies visited include the EACC, CAJ and Transparency International-Kenya (TI-Kenya). Referral sampling is instrumental in accessing and creating rapport with county administrators and oversight staff. Unwilling participants, who happen to have been purposefully selected because of their role-specialisation, recommend other colleagues whom they consider more knowledgeable on the issues of anti-corruption strategies and related mechanisms in the public sector. In addition, documentary analysis is used to complement primary data. This is conducted in a continuous process and involves analysis of survey data, media and audit reports, as well as periodical reports by oversight institutions. Data analysis involved coding, data condensation, schematisation and categorisation within adopted conceptual dimensions and structures of decision-making on anti-corruption behaviours and accountability mechanisms in public administration.

Findings and analysis

The role of hierarchy and internal control mechanisms in whistleblowing intentions

Questions on the utility of external anti-corruption mechanisms or external agencies in whistleblowing may arise when internal processes are ineffective and untrustworthy. However, whistleblowing is indicative of the failure of internal mechanisms and the chain of command. This justifies the relevance of external whistleblowing. Also, structures for public accountability are likely to be loose and uncertain to encourage internal whistleblowing. That is, the bureaucratic power is unequally distributed within public institutions, resulting in unpredictability with respect to organisational action on whistleblowing and against corruption. By design, anti-corruption strategies in Kenya, and by extension whistleblowing mechanisms, underscore the role of internal mechanisms, where employees, especially executives, are required to enforce ethical standards. Therefore, unless otherwise indicated, whistleblowing remains an internal affair.

It has been established that the variance in the ethical climate across public institutions in Kenya is primarily based on two factors. The first is found to be the departmentally specific organisational culture, where internal composites, mainly departmental social cohesion and leadership, influence direction and set priorities on compliance with ethical guidelines as entailed in anti-corruption strategies. The quality of the leadership on ethical matters is found to positively correlate to the effectiveness of internal and external oversight structures. That is to say, the departmental leaders patterned or directed collaborative activities and effectiveness, either fostering or constraining institutionalisation and internalisation of the codes of conduct, the creation of anti-corruption committees and the appointment of Integrity Assurance Officers. The second is the function specialisation of departments and directorates. Departments like internal auditing and other regulatory agencies are obligated to pose an ethical standing because it is their core business and lifeline, lest they become irrelevant and

illegitimate. These two variables – departmental leadership and organisational specialisation – explain the varied prevalence of corruption across different departments and, in turn, determine varied patterns and responses on whistleblowing in the public sector. Likewise, these variables explain why anti-corruption reforms, with respect to their institutionalisation processes, perform relatively better in one ministry or directorate than in another. This is the case despite the prevalence of a generic administrative culture (mainly collectivism or kinship) and an emphasis on bureaucratic processes for whistleblowing that result in poor performance and high likelihood of inaction on whistleblowing by the majority of departmental heads, therefore having little chance of receiving moral support from colleagues.

Conversely, this study confirms that organisational leadership and culture may moderate negative repercussions of ethnic enclaves, bureaucratic centralisation and privilege on anti-corruption and whistleblowing behaviours. For example, besides the fact that whistleblowing has a greater relationship with the personality of the bureaucrat than with conformity to the rules, environments allowing such personalities to remain active correspond to the way administrative executives utilise internal bureaucratic oversight mechanisms. How these managers vertically relay and interact with their supervisors on matters of public accountability in their departments either encourage or discourage whistleblowing behaviours. So, whistleblowing is directly related to personal and organisational characteristics, with respect to the interests and intentions of departmental leaders and accountability champions such as IAOs and internal auditors.

However, the quality of the organisational leadership and the role-specialisation of public organisations have a negative relationship with external whistleblowing tendencies. That is, the degree of interpersonal trust, organisational bureaucratic-identity and effective communication between the management and subordinates tend to resonate with prevailing leadership styles; this elicits either departmental cohesiveness or employee conflicts – jealousy, competition, malice, and so forth – within an organisation. Organisational cohesiveness set preferences for the interpersonal approach and internal resolution of ‘conflicts’ over other channels, including on matters of administrative wrongdoing such as corruption; also, cognisant of their public image, internal auditors prefer internal reporting mechanisms over external oversight agencies. Therefore, positive dimensions of organisational culture such as employee cohesiveness, interpersonal trust and effective communication between management and employees promote internal organisational environments where potential whistleblowers could utilise internal mechanisms and the chain of command to blow the whistle. In fact, the interplay of the above factors and possibilities of whistleblowing were alluded to by an administrator, who stated that:

In our department there is clear established chain of command, therefore misconduct are basically reported by the officer in-charge of a section. It may not be easy for a junior staff to report his boss unless it is something very serious. The department has code of regulations that is strictly followed while handling misconduct. Therefore, action to be taken to an officer involved on the same are clearly explained and must be followed strictly (Cited from author’s interview data, 20 April 2015).

Therefore, as put by Dyne, Ang, and Botero (2003, 1359), '[...] the key feature that differentiates silence and voice is not the presence or absence of speaking up, but the actor's motivation to withhold versus express ideas, information, and opinions about work related improvements.' In departments with ethical leadership, anti-corruption strategies were relatively institutionalised and communicated to employees. However, the communication and training on anti-corruption strategies is confined to high-ranking public officials. Thus, the degree to which the staff is knowledgeable of existing anti-corruption strategies and related whistleblowing procedures is contingent on their rank and the leadership style in a particular department.

From the above statements, and many others, it is clear that administrators consider how whistleblowing could impact them as individuals and their co-workers rather than being concerned about the pursuit of compliance and ethics in the local government. As a consequence, even within seemingly ethical organisational environments, whistleblowing could become anti-social and anti-organisational, that is, against the spirit of teamwork. Furthermore, the quality of the institutional leadership in a particular ministry does not necessarily lead to an improved ethical climate when it comes to external whistleblowing behaviours. That is, there is a problematic relationship between positive whistleblowing behaviours and the performance of government institutions, mainly arising from jurisdictional constraints and factors related to the core business of the department, which are beyond concerns of anti-corruption and public accountability.

The relationship between the vertical and horizontal tolerance of corruption in Kenyan public administration largely depends on how administrative executives generally approach issues of maladministration. Verhezen (2010) argues that managerial position psychologically aligns administrators with either resorting to silence or blowing the whistle. In departments where whistleblowing is perceptively prohibited and where employees think that the management tolerates corruption, they resort to silence. Managers in such departments are withdrawn from the implementation of anti-corruption initiatives in their departments. As a result, a top-down spiral effect of corruption and an acquiescent culture towards whistleblowing in the studied public sector tend to favour unethical organisational leadership. Negative psychological responses to whistleblowing arise from efforts by the county administration and legislative assemblies to control damage. However, this involves disciplining 'soft targets' or low to mid-level cadre administrators instead of executive culprits. It was reported that this causes an apprehensive general response to whistleblowers due to the fear of retaliation and victimisation.

This study also establishes that, for the sake of their public image and based on their autonomous corporate status, county governments prefer internal over external whistleblowing mechanisms. Departmental matters, including incidences of corruption, are generally handled internally prior to involving the EACC and other relevant oversight institutions. However, internal whistleblowing as an 'unwritten rule' is explicitly rooted in the administrative culture. Actually, the stewardship approach of anti-corruption reforms means that, by design and default, accountability reforms have enhanced organisational enclaves instead of openness to external whistleblowing mechanisms. Consequently, employees are under strict instructions and sensitised to utilise *internal solutions* to suspected malpractice. From both the respondents and accessed internal

memos, administrators are required to first engage the chain of command and relevant internal mechanisms before resorting to external avenues on corruption. The use of internal channels like internal auditing or human resource departments is considerably more legitimate than external mechanisms for internal whistleblowing in public administration.

In line with Tshauridu and Vandekerckhove's (2008) observation, organisational emphasis on internal mechanisms in Kenya makes administrators more liable than responsible for preventing malpractices in public organisations. That said, managerial retaliation or disciplinary action cannot necessarily be initiated against the whistleblower. Rather, retaliatory responses may take stock of the previous personal imperfections or capitalise on grey areas to 'punish' the whistleblower. Thus, the common administrative culture in the studied contexts put more emphasis on complying with the hierarchy than on building an ethical culture. As such, whistleblowing as an anti-corruption behaviour is challenging, even for ethical administrative executives to effect. No wonder the normalisation of corrupt behaviours has prevailed over the enforcement of anti-corruption strategies and ethical decision-making processes in county governments in Kenya (D'Arcy and Cornell 2016; Onyango 2018b).

Bureaucratic autocracy, anti-corruption strategies and whistleblowing

The emphasis on the utility of bureaucratic hierarchy in Kenyan public administration on all matters of public accountability does not mean the existence of strict compliance to bureaucratic practices. Rather, it stems from a culture of pre-privilegism that, alternatively, takes stock of the colonial heritage of administration in Kenya. The *big man syndrome* often associated with political absolutism and abuse of power in African states is prevalent in the way administrative executives behave with relation to bureaucratic structures and execute bureaucratic power (e.g. Hyden 2013). The lifeline of Kenya's political system has actually resided largely with the bureaucracy, which has, subsequently, been reduced to a tool of political influence and control. This politics-administration linkage creates a bureaucracy mostly influenced by an autocratic political culture. Political and administrative executives at the local government, as well as the level of national bureaucracy have created a bureaucratic system to serve their influence and interests. This has been the primary source of the constraints for anti-corruption strategies and whistleblowing intentions in public bureaucracies in Kenya (e.g. Onyango 2020b).

As a consequence, the ethical climate at the local government level is largely linked to the bureaucratic personality of county executive officers but not to the bureaucratic processes, namely, ethical guidelines. For example, an administrator in a study conducted by the EACC in Nakuru County stated that they:

[...] are afraid to report corruption cases because they are threatened by County government. They are threatened in many ways, e.g. being denied budgetary allocations such as bursary allocation of 3 [million] per ward. Governor asks for Ksh. 200,000 kick back from each ward. No one has an idea what the money is for. For example, 4 million shillings for renovations of a sub-County hospital but kickback of Ksh. 400,000 to go back to governors account. There is bid rigging of County tenders e.g. in roads. Governor's company together with Member of County assembly and ward administrators are the ones that win. There is challenge of improving laws to curb

corruption because few members of County assembly are used by governors to thwart such efforts. Budget is underutilised but projects are not undertaken (EACC 2015, 55).

In addition, internal administrative environments define the extent to which external accountability institutions access information on corruption and other related administrative ills in county government departments. Thus, even after a whistleblowing incidence, internal oversight institutions are constrained by the influence of governors, a situation that is exacerbated by the ambiguity and the fluid nature of bureaucratic processes. Senior county executives and political representatives patronise internal oversight mechanisms and county government public service boards. This is partly illustrated as follows:

Auditing is not treated as an independent department. We are still under the governor and we are using his logistics. I want to say that we should improve on this so that we have completely different board where I control my own finances because it is me who knows how auditing is very important [...] being under the director of administration means anything that we require we have to go through him as the one monitoring our budget. I want to monitor my own budget in order to ensure that there is that activity of independence (cited from one of the auditors in my interview data, 6 May 2015).

These statements interrogate the autonomy and effectiveness of anti-corruption committees in county governments, and the extent to which potential whistleblowers could be protected or victimised by the county administration. Public bureaucracies in Kenya tend to be more of closed cultural orientation than open-cultural systems with respect to whistleblowing (Hofstede 1980). Like administrators, public institutions are closed, suspicious and secretive towards non-members. Senior administrators enjoy high levels of formal and informal privileges, whereas their subordinates feel disempowered and lack of control over their administrative decisions. With such a closed cultural orientation and a bureaucratic autocracy, whistleblowing intentions are limited. In retrospect, effective communication between departments and agencies is vertically and horizontally constrained by over-centralisation and over-personalisation of bureaucratic processes in the implementation of anti-corruption initiatives.

In consequence, whistleblowing is riskier because of its intolerance by management and co-workers alike. The autocratic administrative culture also makes it difficult to control conflict of interest, especially that of senior administrative executives. Besides, internal mechanisms and, to some extent, external agencies are not appositely designed to effectively hold governors accountable on matters of corruption and implementation of anti-corruption strategies. That said, there are parochial interpretations of ethical decision making that exaggerate the mismatch between bureaucratic and social identities on ethical matters. This illustrates an administrative culture that is more inward-looking and more attentive to deepening its autonomy and authority than to building collaborative strategies to improve technical environments for the implementation of anti-corruption reforms.

Bureaucratic identity vs. social identity in local governments

The pursuit of representative bureaucracy in contemporary public administration has involved several sets of public sector reforms. The key principle in the local

government reforms in Kenya is to address corresponding social or ethnic tensions that may constrain the effectiveness and subsequently the legitimacy of the government. A focus on social composites of public organisations views governmental institutions as *mirror organisations* that always reflect the social or ethnic demographics of the society. That is, understanding the social composition of public bureaucracies is essential for understanding administrative behaviours and actions (Pepple, Davies, and Davies 2017). In this study, working groups in Kenyan public administration are found to largely coalesce along their ethnic groups, i.e. ethnic identity corresponds to the degree of organisational solidarity. In the language of Pepple (2020, 1), the organisational solidarity can ‘manifest in employees’ self-efficacy, organisational self-identity and employee voice behaviours’ in public bureaucracies. Kinship structures, in particular, embody social ideologies that tend to stimulate identity considerations. Kinship structures are also essential in the socialisation of administrators on most administrative matters, including whistleblowing or indulgence in corruption.

Thus, a negative correlation is found between kinship enclaves and the effectiveness of internal whistleblowing mechanisms, wherein bureaucratic identity is overridden by social identity. As a result, anti-corruption committees are weakened by divided loyalties between ethnic and bureaucratic identities. Administrators are often biased in their responses to whistleblowing and illicit practices. This is because some departments are largely staffed by workers with a particular ethnic identity who politically and administratively position themselves against ‘Others’. Indeed, organisational conflicts along ethnic identities often come into play in the way administrators respond to malpractice. Thus, anti-corruption strategies are too loosely embedded in administrative practices to stimulate whistleblowing behaviours in the studied contexts. This is further exacerbated by the politicisation of the illicit behaviours, especially if powerful political administrators (governors and their executives) are involved, leading to identity conflicts.

Therefore, the way in which organisational solidarity and bureaucratic identity are constructed prohibits external whistleblowing and protects certain individuals. This means that whistleblowers may become formally and informally apprehended, consequently resorting to silence, either through fear of victimisation or by protecting a co-worker. This shows how whistleblowing can draw on either competing conceptualisations of bureaucratic identity or the clash of identities and values in public administration. Again, uncertainty of whistleblowing outcomes and ignorance of investigative procedures push administrators to seek directions from or confide in administrative executives, including seeking guidance on how to cooperate with external investigative agencies. This means that investigative processes to build adequate proof in corruption cases could become distorted and redirected from the key culprits. It is reported that inadequacy of proof is the key impediment to organisational action after whistleblowing by external agencies and subsequently a constraint to the integration of anti-corruption strategies in public administration in Kenya.

In such cases, acquiescent and quiescent responses by administrators to corruption are subject to the fact that a potential whistleblower can either be unaware of the scope of the corruption and the parties involved or uncertain about the course of action to take after whistleblowing. An affective administrative culture and a social identity

dilemma, therefore, pose challenges in demarcating clear boundaries between a corruption scandal and parties involved and ethical decisions making, mainly, whistleblowing. Furthermore, the kinship orientation of administrative culture in Kenyan public administration aggravates the problems of collective action, i.e. collegial stigmatisation and victimisation of whistleblowers and ineffective implementation of anti-corruption legislation. It also points to the role of the social culture as the supply side of administrative culture in determining the ethical climate of public administration.

Accountability deficits in the structure of the local government model

With respect to the effectiveness of external oversight agencies in the implementation of anti-corruption strategies and the enforcement of a whistleblowing culture, these agencies mainly suffer from underlying institutional blind spots. These are reported both in the design of the mandate of these agencies and in that of the local government. Design deficits of accountability agencies and loose inter-institutional relations at the local-state level are blamed for conflicting bureaucratic jurisdictions and collective action problems. These deficits aggravate legal constraints on whistleblowing in public administration. For example, senior accountants under the tutelage of county governors could rationalise their actions based on these institutional blind spots to sabotage ongoing investigations. This increases uncertainties of whistleblowing processes and delays action on corruption culprits.

In other words, the legal framework in county administration and approaches pursued by oversight agencies are either inconsistent or fluid when they come to some forms of corruption. This, in turn, impedes the building of effective inter-agency and inter-sectorial whistleblowing mechanisms. For example, Section 41, Part VI of the Public Officer Ethics Act 2003 (POEA) cautions administrators against *divulging of information*, failure to which will give rise to hefty penalties levied on the whistleblower. These ethical guidelines present corrupt executives with legal advantages, which they could employ to cover up corruption, as well as leeway to victimise or retaliate against whistleblowers. The looseness of the anti-corruption framework within local government institutions and attendant implications for whistleblowers were verified by a respondent as follows:

We have our own investigative body comprised of the service delivery unit which is in charge of all monitoring of projects. But you see, this being an in-house thing, it does not have a legal arm in it that is why we have to refer it to the EACC in accordance to Chapter Six which is basically the EACC (cited from my interview data, 11 August 2015).

But the EACC official further reiterated that even after receiving such referrals from governmental departments, they often confront legal and political challenges during investigations of corruption in county governments, especially where senior administrators are suspects. Retrospectively, institutional and legal inconsistencies in the anti-corruption implementation framework are not clearly understood by administrative executives with respect to compliance with the EACC directives on matters of investigations. For example, based on a study conducted by the CAJ in 2014, it was not unusual that administrators failed ‘to respond to inquiries on complaints (by CAJ) (or

failed) to honour summonses issued by the Commission' (CAJ 2015, 60). Internal investigations are conducted in an *ad hoc* manner based on unclear legal guidelines and processes made on directives from the chain-of-command rather than on existing due-processes.

As argued by Rothschild and Miethe (1999), institutional blind spots can allow corrupt managers to promote administrative norms that are antagonistic to those of external mechanisms and codes of conduct. In fact, it is reportedly not unusual for administrative executives in county administration to capitalise on implicit institutional gaps to beat corruption cases built against them. Studies have shown that institutional blind spots are generally a challenge in the pursuit of public accountability in county governments in Kenya. This has been largely because of the complex power relations, loose control of mechanisms, and poor coordination between central and local governments (Onyango 2018a). In consequence, if the anti-corruption framework is not appropriately designed, it may succumb to inter-governmental reform complexities that make whistleblowing riskier, thus creating a quiescent and acquiescent administrative response to corruption by employees and problems of organisational commitment. Indeed, prevailing institutional inconsistencies on corruption make it harder for executives to act on whistleblowing in some government ministries.

A retaliatory administrative culture, bureaucratic politics and whistleblowing

Whistleblowing could escalate workplace conflict partly because of bureaucratic politics and intricate power-relations between different working groups (either perceived or actual) in a particular department of studied contexts. The relationship between administrative factions in the studied contexts is commonly characterised by distrust, malice and rivalry. This fosters a general culture of intolerance by managers and their 'loyalists' towards organisational or individual dissidence, mainly perceived to come from an opposing group. In most cases, divergent administrative opinions or suggestions from a working group or individuals perceived to be 'disloyal' to the executive are considered suspicious and largely treated as potential sabotage. As such, whistleblowing could appear as a form of divergent behaviour or organisational dissidence. Retaliatory responses are traced to autocratic management styles, an extensive scalar-chain and politically oriented power relations in public administration. In reflection of this a respondent states that: 'This is due to when [sic] the head of department is found misbehaving the other employees under him or her should report [but] the decision the boss makes is the final' (cited from my interview data, 5 May 2015).

Altogether, the existing administrative-political synergies create, most of all, *bureaucratically arrogant administrators* endowed with scores of legitimate discretions to devise and instigate unrelated disciplinary action against perceived and actual 'threats' in domain organisations. Even though disciplinary actions are often difficult to administer in public organisations (Onyango 2019b), executive managers could still instigate informal actions to isolate and subsequently open windows of opportunity for formal punitive measures against the perceived and actual dissidents. Alternatively, if there are limited chances of action against the whistleblower or 'disloyal' subordinate, executive managers could build evidence over time that could eventually create a strong case against the targeted personnel. It is stated that some of the formal retaliatory responses

to whistleblowers include a transfer to *unfavourable stations of work*, staff movement, and poor performance appraisal evaluation (Onyango 2019b).

Potential whistleblowers in the studied contexts usually factor in these parameters before they blow the whistle on their superiors or co-workers. Hence, in line with deviance theorists, despite a few incidences or positive attitudes towards whistleblowing, there is a general atmosphere of withdrawal from management issues by administrators, including on matters of whistleblowing in the studied contexts. That is, administrators hardly get involved in those responsibilities that are not relevant to them, and, by all means, avoid ‘trouble’ with senior managers. As such, whistleblowing is a *controversial* behaviour and could not be easily considered by administrators unless one has powerful connections in the hierarchy or if their identities are fully anonymised. This points to complexity in the administrative conceptualisations of organisational and public interests, as well as alluding to a problematic organisational citizenry in Kenyan public administration.

Consequently, even if whistleblowing is essentially a role-specialisation for administrators, e.g. internal auditors or IAOs, their actions to blow the whistle are more likely to be interpreted differently by the management and co-workers. That is, whistleblowing is, in general, perceived as vindictive, with an element of un-forgiveness and self-centredness. Other respondents also consider whistleblowing as a form of administrative pettiness, lack of brotherliness, malice and putting your nose in others’ business, mainly because of jealousy. Thus, whistleblowing is hardly founded on the genuine intentions and motivation of whistleblowers to uphold ethical standards in their departments. In fact, when administrators were asked *whether they thought whistleblowing could improve anti-corruption behaviours*, the feedback received revolve around the role i.e. managerial commitment and the fear of retaliation. This is partially due to unequal power relations and lack of clear role conception (i.e. *it is not my business attitude*) with respect to whistleblowing.

To further understand trends of whistleblowing in local administration, administrators were asked *what would you consider before whistleblowing on your superiors?* Some of the following responses came forth. Regarding the consequences of blowing the whistle on the supervisor, a female member of staff, whose department is ‘not at all’ concerned with whistleblowing, responded that she would not want to appear as the *odd one* by blowing the whistle on witnessed corruption. However, when she was asked whether there were adequate measures to address corruption in her department she answered, ‘yes, there are’; but she replied ‘no’ when she was asked whether she thought whistleblowing would aggravate anti-corruption behaviours (based on the author’s interview data, 7 July 2015). Another administrator also considered ‘the consequences of ‘me reporting him’ [sic]. ‘If it can lead to me losing my job, then I’ll have to hesitate’ (cited from author’s interview data, 10 July 2015). This respondent further said, ‘misconducts are a great concern to my department. In terms of time I can say that the concern is on monthly basis [...] but the greatest challenge is lack of professionalism, and integrity among the enforcers’ (cited from author’s interview data, 10 July 2015). But, when he was asked whether whistleblowing can control corruption in his department, he answered:

No! [it] will not curtail their occurrences as everyone is culpable. It is the reporter who will suffer in the long run. As regarding my boss, I have not thought about it because he upholds professional ethics [...] anytime a complaint is raised about misconduct (cited from author's interview data, 12 May 2015).

The above-cited responses describe two scenarios of whistleblowing in public administration in Kenya. The first describes a 'disengaged behaviour based on resignation, [and] self-protective behaviour based on fear' (Dyne, Ang, and Botero 2003, 1360). The second, which is tied to the first, indicates the intervening role of organisational culture, leadership and bureaucratic personalities in determining ethical decision making by administrators. The stewardship approach upon which anti-corruption strategies are founded in Kenyan public bureaucracies can, therefore, either create an internal organisational environment for whistleblowing or institutionalise retaliatory responses to whistleblowers, both imagined and actual. In general, the existing accountability frameworks in Kenyan public administration need to insulate potential whistleblowers from the prevailing emotional and professional 'attacks' and isolation to post-whistleblowing.

Concluding remarks

Analyses and findings presented in this article have demonstrated the ubiquitous nature of whistleblowing and underlying factors that either enhance or frustrate whistleblowing behaviours in public administration. Much as administrative culture provides unusual behavioural considerations on why and how potential whistleblowers go about interacting with existing mechanisms and dominant norms in public bureaucracies, and despite generic limitations provided by its frame, ethical and transparent bureaucratic processes positively correspond to high possibilities of whistleblowing behaviours. In line with extant studies on organisational whistleblowing across the globe, this paper demonstrates that common variables, mainly the fear of victimisation, inaction on malpractices, lack of confidence in accountability mechanisms and ignorance of related procedures and processes, are the key determinants of whistleblowing behaviours in most bureaucratic contexts. The general limits of rationalisation of organisational processes may therefore need to be addressed in public organisations to enhance both structural and behavioural repertoires for anti-corruption strategies and whistleblowing behaviours in public administration. As shown by the data presented in the present discussion, anti-corruption strategies and by extension whistleblowing intentions, which are largely embedded in the technical capacities and ethical boundaries of administrative executives, may confront management 'blindness'. Management 'blindness' perhaps relates to an absence of available data that allow public managers to understand the impact of their behaviours on the effectiveness of anti-corruption mechanisms and the probable sustainability of their progress through whistleblowing behaviours. This would most likely result in increased managerial uncertainty, resistance to change that may further accrue from successful implementation of anti-corruption requirements and whistleblowing tendencies by public administrators. Hence, little organisational commitment and collective chastisement of whistleblowers in public administration may aggravate the management and employees' ethical-blindness.

By illustrating the difficulties in creating effective whistleblowing mechanisms as demonstrated in Kenya, this article builds on the neoinstitutionalist perspective that partially believes that bureaucratisation and rationalisation deficits may be attendant to the complex nature of informal processes and culture both inside and outside public bureaucracies. The embeddedness of anti-corruption and whistleblowing strategies in the organisational stewardship approach in Kenyan public administration does little to promote whistleblowing behaviours and the effectiveness of attendant mechanisms. Such an approach not only tends to succumb to problems of principal-agent arrangements but also leads to an interpretation of anti-corruption strategies within the context of a deep-seated administrative culture such that its very foundations and evolution over time may hinder rather than promote public accountability. In such a case, whistleblowing and anti-corruption processes are mostly linked to the discretionary powers of administrative executives who decide on the course of action.

This article further demonstrates that even though whistleblowing is an essential component of accountability reforms and can bolster the functionality of bureaucratic and political oversight mechanisms, weak whistleblowing structures are most likely to promote relatively complex problems of capacity in enforcing ethical guidelines in public administration. Weak whistleblowing mechanisms can also compound the instrumental-cultural gaps between oversight and public institutions with respect to controlling administrative corruption. It has been proven that components of administrative culture, mainly privilege and autocratic management styles in Kenyan public administration, influence whistleblowing and anti-corruption behaviours. This alludes to the general nature of the relationship between policymaking and implementation processes in public administration of developing countries.

In addition, the collectivist attitude of public administrators may complicate the pursuit of administrative justice and create collective chastisement of whistleblowing behaviours. This could arguably be one of the primary impediments to the implementation of the collective action approach to anti-corruption reforms in the global south. Problems of collective action are likely to incapacitate organisational learning processes on the benefits of effective anti-corruption norms and practices that may otherwise be measured by the degree of tolerance and occurrences of whistleblowing incidences in public entities.

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