Speaking Truth through Power

Conceptualizing Internal Whistleblowing Hotlines with Foucault's Dispositive

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Introduction

This article examines the ambivalences, limitations and dilemmas associated with the internal whistleblowing hotline, understood here as a management technique that strives to contain, codify and standardize acts of speaking up against illegal or unethical practices. In other words the interest in the following is on what happens when the radical practice of whistleblowing or 'speaking truth to power' is institutionalized and transformed into a practice of 'speaking truth *through* power' – i.e. through the managerial instrument of the whistleblowing hotline.

The internal whistleblowing hotline[i], which enables employees to anonymously inform the organization about unlawful acts and serious incidents of unethical conduct without fear of retaliation, has become a vastly widespread management technique in recent years (Vandekerckhove, 2006: 1). Since the Enron-scandal in 2002, where whistleblowing channels were introduced by the U.S. government through the Sarbanes Oxley Act, anonymous whistleblowing possibilities have become obligatory throughout a wide range of industries across the globe (World Law Group, 2012). While practitioners and suppliers (e.g. Bridgen and Mathewsson, 2013; Datatilsynet, 2013; Petry, 2012), and to some extent scholars (e.g. Lewis, 2002), often describe the internal hotline prescriptively, in pragmatic–technicist terms as a managerial tool for streamlining organizational communication on sensitive topics, there is still much confusion around the topic in public debate. In Denmark, for example, where this study was conducted, trade unions have had difficulties in terms of taking a clear position on the subject. Some unions have expressed skepticism due to the risk of creating a 'snitching culture' at work[ii] , with some even going so far as refusing to publish advertisements for whistleblowing

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hotlines in their member-magazines[iii]. Conversely, other unions have happily published these advertisements, as well as openly supported the implementation of internal hotlines, arguing that they represent an enhancement of employee free speech[iv]. Still other trade union organizations have not taken any position, while a number of union representatives have sought out this researcher, seeking advice on what to make of this confusing organizational phenomenon.

The Foucauldian concept of dispositive, it is here proposed, can help us understand this confusion, by showing how an ostensibly expedient technique is in actuality shrouded with ambivalence and contradiction, which in turn gives rise to a series of dilemmas and limitations with regards to the aim and function of the internal whistleblowing hotline. The term dispositive denotes a particular connection between a heterogeneous set of components such as discourses, techniques and governmental rationalities (Foucault, 1980:194; Raffnsøe et al., 2016;). Hence, by focusing on the appearance of certain social dispositions, and conveying the way in which these affect organizational behavior, a dispositional analysis can enable the elucidation of conditions for organizing, in this case organizing whistleblowing. More specifically, the analysis shows how multiple dispositives in the form of 'discipline', 'security' and 'dialogue' as an alteration of the latter, are all potentially compatible with the whistleblowing hotline, which can then be understood as a technique permeated by a plurality of schemes, each suggesting different versions its aim, function and effects (see also Foucault, 1980: 195). Dispositional analysis itself to the investigation of the dispositionally prescriptive level, and the analysis is accordingly empirically based on documents, which offer prescriptive accounts of internal whistleblowing hotlines in a Danish context.

As these remarks suggest, the goal of this article is to demonstrate how the whistleblowing hotline, and its facilitation of the speaking of truth through power, implies a level of complexity, which has hitherto remained largely unacknowledged. Given as much, the article's next sections will explain the context and background of the whistleblowing hotline as a technique, before

surveying the existing research on whistleblowing and whistleblowing hotlines. Following this, the theoretical framework, in the form of Foucault's dispositive approach and methodological considerations are presented, followed by a dispositional analysis of the whistleblowing hotline. In the concluding section, I summarize the results and discuss the dilemmas and limitations that arise when organizations seek to manage whistleblowing through internal hotlines.

Background and existing research

From whistleblowing to whistleblowing hotlines

In many ways the advent of the internal whistleblowing hotline marks a departure from the way in which whistleblowing has hitherto been conceived in both academia and broader society. The term whistleblowing has been applied in an organizational context since the early 1970s, when it was originally defined by attorney and activist Ralph Nader as

> "An act of a man or a woman who, believing that the public interest overrides the interest of the organization he serves, blows the whistle that the organization is involved in corrupt, illegal, fradulent or harmful activity" (Nader, 1972: 1).

Nader's conception, in which whistleblowing is seen as the result of a conflict between the organization and broader society, has long played a dominant role in both popular culture and public debate. Both have accordingly tended to represent whistleblowing as part of a narrative about the 'little man' or woman, lacking institutional support, who appeals to the public in a heroic and risky battle against a powerful and amoral organization (Quin, 2015). This traditional mode of whistleblowing, of which Edward Snowden and Daniel Ellsberg are iconic examples, is described by researchers (Kenny, 2017; Kirchner, 2014; Rothschild, 2013; Santoro and Kumar 2018) and whistleblowers (Gun, 2004) alike as a practice of 'speaking truth to power'. As such it differs in a number of ways from the 'institutionalized critique' (Weiskopf and Tobias-Miersch, 2016: 1636) facilitated by the internal whistleblowing hotline, in which the whistleblower is speaking through company channels – i.e. through power.

The central innovation of the whistleblowing hotline thus lies in converting Nader's conflict between the interest of the public and the interest of the organization into an internal affair: the scandal plays itself out within the organization, away from the public eye (du Plessis, 2014). In this way, 'the public interest' has no possibility to override the interest of the organization, and whistleblowing is accordingly not conceived as a threat to organizational order, but instead as a potential facilitator of its continuation (Tsahuridu and Vandekerckhove, 2008). This type of facilitated whistleblowing is often legitimized through a discourse where the efficient organization, through the realization of its triple bottom-line, acts as the guarantor of a wealthier and happier world where "public good and organizational good are the same" (Contu, 2014: 399). The formal objective of the internal whistleblowing hotline, which is typically supplied by an external provider, is to "collect potential information about persons affiliated with the company such as employees, board members, auditors, attorneys or suppliers, who are involved in serious offences such as bribery, fraud or forgery" (Datatilsynet, 2013). It allows employees to anonymously and/or confidentially inform the organization about unlawful acts, as well as serious incidents of unethical conduct or conduct in breach of internal rules and regulations (Søndberg and Winther, 2011:52). The anonymity and confidentiality of the hotline are supposed to protect the whistleblower from potential retaliation that might otherwise result from addressing such issues directly. The popularity of these hotlines stems partly from the fact that they promise to render the "disruptive" (Bok, 1989: 214) elements of traditional whistleblowing manageable to the organization through the application of a simple and straight-forward technique (Petry, 2012). As will be shown in the following, however, this institutionalization of the whistleblowing process opens up a new set of problems that challenge the project of neutral manageability associated with the whistleblowing hotline. In fact, such hotlines may give rise to a series of obstacles and dilemmas with regard to its aim and function.

Whistleblowing research

While whistleblowing hotlines have spread rapidly and globally to both private and public organizations, research on internal whistleblowing hotlines remains limited (Pemberton, Tombs, Ming and Seal, 2012: 263). In contrast, more general research on whistleblowing has a long tradition within organization studies (e.g. Miceli, Near and Dworkin, 2008), where the majority of studies have been conducted according to the rules of positivist management and organization science (Contu, 2014). While this strand of research does not necessarily distinguish too strictly between whistleblowing facilitated by internal hotlines and external whistleblowing directed towards the public, the latter, however, is the most prevalent focus. To the extent that power is thematized in this research, it is through resource-based notions as a zero-sum entity, that organizational actors can either possess or not (Loyens and Measschalck, 2014; Miceli and Near 1994; Rehg et al., 2008). Furthermore, traditional whistleblowing research is often interested in predicting those factors which might either encourage or inhibit whistleblowing, factors explored through the use of large data-sets (e.g. Near and Miceli, 1996; Skivenes and Trygstad, 2015). One such predictive factor, for example, is the recipient of the whistleblowing report (Morberly, 2014). Here, studies show that reporting through internal channels is generally associated with less retaliation (Mesmer-Magnus and Viswesvaran, 2005), whereas reports to external recipients, while leading to more retaliation, tend to be more effective in changing organizational practices (Dworkin and Baucus, 1998). In general, however, predicting the frequency of whistleblowing remains a somewhat difficult task (Alford, 2001: 14-16). Little wonder, therefore, that existing models for conceptualizing the whistleblowing process have been described as "gone a bit stale", with new perspectives needed (Morrison, 2009: 345).

In heeding this call, a more recent strand of scholarship is exploring the ethical and political aspects of whistleblowing. For instance, Kenny and colleagues have explored the retaliation process often experienced by whistleblowers through concepts such as "normative violence" and "impossible speech" (Kenny et al. 2018; Kenny 2017; 2019). In a similar vein, Weiskopf and

Willmott (2013) have conceptualized whistleblowing as an act in which the whistleblower questions and problematizes a moral order, and in the process also (re)defines her relation to self and others. In continuation hereof, the Foucauldian concept of *parrhesia* (Foucault, 2001), which is often linked to the idea of 'speaking truth to power'' (eg. Bruss, 2019; Dyrberg, 2014; Larsen 2007), has proven to be a particularly fruitful avenue for conceptualizing traditional whistleblowing, in which the whistleblower lacks institutional support but in the name of the public interest exposes both herself and the organization to risk by way of publicly challenging its moral habitus (Kenny, Fotaki and Vandekerckhove, 2016; Munro, 2016; Weiskopf and Willmott, 2013). Compared to the parrhesiast who "risks his life because he recognizes truth-telling as a duty to […] help other people"(Foucault, 2001: 19-20), internal whistleblowing hotlines thus represent a different modality of whistleblowing, where truth is spoken through power in the form a specific management technique, and neither whistleblower nor organization are exposed to the same amount of risk (Weiskopf and Tobias-Miersch, 2016: 1627; Munro, 2018: 116). Relatedly, a number of scholars have suggested that in order for whistleblowing to have impact, the truth-telling must first reach outside the existing systems and structures in order to provide a shock to the organization, typically in the form of a media-initiated scandal (e.g. Contu, 2014; Grant, 2002; Vandekerckhove and Tsahuridu, 2010). In this view, internal whistleblowing is seen as a means of institutionalizing or 'decaffing' critique (Contu 2008; du Plessis 2018; Weiskopf and Tobias-Merch 2016).

While some researchers are thus skeptical of the institutionalization of whistleblowing, the majority of studies have remained quite optimistic. Accordingly, research on whistleblowing hotlines has suggested that understood in rational management terms' internal reporting "promotes the smooth functioning of the free enterprise system […] in the sense that it may expose illegal or unethical practices that in effect create unequal conditions of competition" (Pemberton et.al 2012: 265). In a similar vein, Lewis (2001: 202) states the arguments in favor of adopting a whistleblowing procedure:

- "by deterring malpractice and avoiding crisis management it can contribute to the efficient running of the organization;

- by providing accountability it can help to maintain the organisation's reputation;

- it can help to ensure compliance with the law and minimise external disclosures;

- it is a good practice which does not cost much to implement."

As a result of this kind of optimistic view, much of the research on whistleblowing hotlines is prescriptive and concerned with best practices (Vandekerckhove et. al 2016) and benchmarking (Hassink, Vries & Bollen, 2007). In addition, pragmatic matters such as how to efficiently implement the hotline (Lewis, 2002) and disseminate it to employees (Lee and Fargher, 2012), while avoiding legal problems (Lewis, 2001) have been explored. A consequence of this optimistic and pragmatic focus, however, is that the whistleblowing hotline as such remains unquestioned. The hotline is simply taken for granted as a neutral managerial instrument, yet another technique for making organizations better, cleaner and more effective. Hence, it has recently been asserted that the "linear, process-oriented models" in most existing studies of whistleblowing hotlines "are somewhat limited in that they simplify what are, in reality, complex organizational dynamics" (Kenny et al. 2019: 2).

Accordingly, this paper applies a more critically descriptive approach to the hotline as a managerial instrument, as well as a notion of power that is better suited to account for the ambiguity and complexity that arises, when attempting to manage and systematize a radical practice like whistleblowing. While power in the existing research has primarily been understood as a resource that can 'shift' (Loyens and Maesschalck 2014: 155) between various actors in the whistleblowing process, this paper relies on a Foucauldian conception, which sees the whistleblowing hotline as a management tool permeated by power-relations in the form of heterogeneous dispositives, each imbuing the management of the whistleblowing process with a different aim and function. In putting aside prescriptive claims about smooth organizational running or how best to facilitate whistleblowing, and instead inquiring into the complexities of

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the whistleblowing hotline as a management technique, this paper accordingly explores the conditions for organizing implied in the use of this technique. By highlighting the way in which certain social dispositions and inclinations interact in the context of the whistleblowing hotline, dispositional analysis enables a critical discussion of the tensions, dilemmas and limitations embedded in the hotline, which have been largely overlooked in the existing research.

Theory

The term dispositive commonly denotes the specific connection between a diverse set of components such as discourses, techniques and governmental rationalities (Foucault, 1980: 194). The main theoretical points of reference in the following derive from Foucault's College de France lectures (Foucault, 2008, 2009), along with subsequent operationalizations of dispositional analysis (eg. Raffnsøe et al. 2016; Villadsen, 2019). The section begins by situating the concept of dispositive in relation to Foucauldian studies of organization and governmentality, before detailing how the attunement of dispositional analysis towards social heterogeneity is useful for understanding the ambiguous nature of the internal whistleblowing hotline.

The dispositive and organization studies

Part of the appeal of Foucault's concepts, not least in relation to organization studies, has been their ability to push the analysis beyond a preoccupation with already established categories such as 'organization' and 'individual' and hence guide the analysis towards practices and processes of organizing as opposed to fixed entities (cf. Raffnsøe et al. 2019). While this is certainly also the case for dispositional analysis, which cuts across "inflexible categories such as institutions, classes, and cultures, together with ideas, ideologies and beliefs" (Raffnsøe et al. 2016: 273) the concept of dispositive has hitherto been 'notably absent' (ibid.) from organizational research. Most commonly, it is conceptualized in relation to governmentality studies (see e.g. Daudiegeos et al., 2016; Hillier and Byrne, 2016; Munro, 2012; Weiskopf and Munro, 2012), which are characterized

by their reference to the late Foucault's interest in "governing at a distance" and the "the nexus between political rationalities and technologies of rule" (O'Malley, Weir and Shearing, 1997: 503). The concept of governmentality, however, is also commonly associated (and to some extent conflated) with biopower, security and more modern liberal forms of government (Raffnsøe et al., 2016: 282), and less so with earlier forms such as law and discipline, which are distinct dispositives in their own right (Foucault, 2007: 7). Relatedly, governmentality studies have come under criticism for a somewhat totalizing and monolithic portrayal of 'neoliberalism', which bears little resemblance to the often complex assemblage of multivocal and contradictory technologies that make up modern government (Bevir, 2016). Such critiques are concomitant with calls for more hybrid perspectives, which allow for contestation, inconsistency, polyphony, ambivalence and social heterogeneity (Collier, 2009; O'Malley et al., 1997). In this perspective, organizations are seen as products of "governmental rationalities [that] overlap, lean on each other, challenge each other" (Foucault, 2008: 313). At the same time, however, organizations can also play a crucial role in affecting the interplay of these "different arts of government" (Foucault, 2008: 313). Dispositonal analysis, then, allows for the analysis of such dynamics. More specifically, it enables us to discern the "various kinds of pervading, yet not all-powerful, dispositional logics [that] come into play and concur to create a multi-layered field of normativity" (Raffnsøe et al., 2016: 285). Rather than being synonymous with 'governmentality' (see Raffnsøe et al., 2016: 281), the concept of dispositive is thus more useful when viewed as a distinct concept, that highlights ambivalence and "contrasting governmentalities" (Gottlieb and Jensen, 2016) as opposed to ideal and monolithic typifications.

Dispositional analysis

As an analytical tool, the concept of dispositive provides access to the social formation and transformation of the conditions for human agency, which shape, or dispose, how we think, feel and act, but without determining what we do completely (Raffnsøe et al., 2016: 274). Dispositional analysis, then, elucidates the conditions for organizing by focusing on the

appearance of certain social dispositions or inclinations and by articulating the way in which these arrangements affect social interaction and organizational behavior. This approach thus invites us to investigate the extent to which organizations, management techniques, and decision-making are "affected by, relate to, and further develop various given dispositions" (Raffnsøe et al., 2016: 277) Foucault has described the dispositive as:

> "(…) a thoroughly heterogeneous ensemble consisting of discourses, institutions, architectural forms, regulatory decisions, law, administrative measures, scientific statements, philosophical, moral and philanthropic proportions—in short: the said as much as the unsaid (Foucault, 1980: 194)".

The relational rather than substantive nature of the dispositive entails that it is not defined solely by its different components, but also the "transversal set of connections between these components" (Raffnsøe et al., 2016: 278). Where specific tools such as risk-assessment matrices or whistleblowing hotlines can be understood as specific techniques, the dispositive denotes the conglomerate of techniques that are systematically connected and invested with a specific rationality (Dean and Villadsen, 2016: 94). For example, Foucault describes the development of the disciplinary dispositive during the 19th century, as a "technical mutation" of various specific techniques across diverse organizations such as the army, the prison and the school, into a common governmental imperative (Foucault, 2007: 7-8). The example stems from Foucault's lecture-series from 1978, where he describes the emergence and gradual interweaving of the three prototypical dispositives in Western societies, namely the juridico-legal code, the disciplinary system and the apparatuses of security (Foucault, 2007: 7). Crucially, these dispositives should not be understood as separate parts of a development whereby one replaces the other (Foucault, 2007: 9).

Accordingly, the analysis of dispositives seeks to avoid sweeping epochal characterizations such as 'post-disciplinary' (Raffnsøe et al. 2016: 276) or 'neoliberal'. Instead, the dispositives supplement, overlap and interweave with each other, in ways that are reflected in the specific

techniques (Foucault, 2007: 8), such as the whistleblowing hotline. An often cited example of this is Foucaults description of how the technique of punishment through incarceration, which originally emerged in conjunction with the juridico-legal dispositive, can also function as a corrective and disciplining mechanism, just as the dispositive of security can inscribe a violation into a calculation of costs and a series of probable events (Foucault, 2007: 4). These types of overlaps and interweavings between dispositives give rise to frictions, contradictions and paradoxes that manifest themselves in the specific techniques. This has also been described as a form of "oscillation" (Villadsen, 2013: 56) or "dynamic repercussions" (Dean and Villadsen, 2016: 96) between various dispositives, in which the specific problem or technique will manifest itself differently according to the type of dispositive permeating it. This means that the question of how the specific problem or technique is to be understood becomes indeterminable (see also Foucault, 1980: 195). However, despite the centrality of this idea for Foucualdian dispositional analysis, contemporary empirical examples of multiple dispositives permeating the same problem or technique are still rare. Foucault himself provides the above-mentioned 'childish' (Foucault, 2007: 4) example of criminal incarceration, which is widely cited in the recent literature on dispostives in organization studies (e.g. Dean and Villadsen, 2016: 96; Raffnsøe et al. 2016: 280). But apart from this and a few other related examples given by Foucault on topics such as grain scarcity (2007: 30), there are still rather few explicit contemporary empirical examples of these types of dispositional frictions and co-existences in the existing research (see however Daudiegeos et al., 2016; , Villadsen 2019: Whelan, 2017).

In sum, the concept of dispositive is helpful for showing how contrasting logics can permeate the whistleblowing hotline as a managerial technique, each offering their own version of its aim, function and effects. Insight into this prescriptive dispositional indeterminacy can in turn shed light on a series of limitations and problems related to the way in which the whistleblowing hotline is utilized and comprehended in the organization.

Method

This study is limited to a Danish context, which implies that the prescriptive accounts of internal whistleblowing hotlines that are investigated, are authored by either Danish organizations or external hotline providers operating in Denmark. The following section begins by contextualizing this Danish case before presenting the selected data and how it was analyzed.

The Danish Case

For Danish organizations, the most common design of an internal whistleblowing hotline entails using an external hotline provider[vi] that receives the initial report through an encrypted webpage or anonymous phone hotline, whereupon it is discretely forwarded to a designated recipient within the organization, typically a compliance officer or board member, who then initiates an internal investigation. Large multinational corporations generally employ external providers who are able to receive reports in many different languages at all times of the day, while complying with the legal standards required by the EU and the U.S. (Petry, 2012). Smaller and more locally based organizations, who do not have the same need for multi-lingual 24-hour service, tend to use specialized Danish suppliers or law firms. As the most popular hotline service providers[vii] are generally global operations, we can assume a certain transnational standardization with regard to the design and operation of whistleblowing hotlines, while the national and organizational contexts into which they are implemented can of course vary greatly. While the Danish context of this study accordingly does not necessarily limit its range of applicability too much, it has however provided a clear guideline for data-selection.

The Data

The empirical basis of this study is a database of texts that prescribe and discuss the strategic imperatives of whistleblowing hotlines, including the aim, function and general operation of the hotline, as well as recommendations on how best to implement it in the organization, what

procedures to set up around it, etc. Such prescriptive accounts of the aim and functioning of whistleblowing hotlines are primarily found in two places:

1. The publicly available records of registered whistleblowing hotlines from the Danish Agency for Data Protection, where companies applying for approval of their whistleblowing hotline up until 2018 were required to describe its purpose and function. All available descriptions from Danish companies (approx. 160 – see appendix 1) were printed out in 2013. As a result of changes in data protection laws[viii], these records are no longer publicly available

2. Reports and instructions from external hotline providers on how to implement and facilitate whistleblowing hotlines. These are primarily found on the webpages of external providers, from which approximately 200 pages of relevant documents have been collected and analyzed (see appendix 2). These documents come in multiple forms, including reports, evaluations, sales brochures, implementation guides for management, promotional case-studies and blog entries.

Data-analysis

The collected documents were initially read in a 'first order reading', in which existing theories and concepts were sought bracketed in favor of a 'witting ignorance' (Gioia et.al. 2013: 21). This first order reading led to a subsequent '1st order analysis' (Gioia et al. 2013), in which the documents were coded with data-centric terms, as opposed to researcher-centric or theoretical terms. The coding process was guided by my original research interest, which, inspired by the aforementioned ambivalence around whistleblowing hotlines in the Danish public debate, revolved around the aim and function of the whistleblowing hotline as a managerial instrument for handling organizational criticism. Many terms, concepts and codes emerged in this process, and an effort was made not to distill them too early (Gioia et al. 2013:20). This in turn resulted in a rather large and unmanageable compilation of 1st order categories, such as "the whistleblowing hotline as a safety-valve", "create a trust-based environment", "create a control environment" and numerous detailed descriptions of procedures for handling complaints. When these thematic categories had to be condensed into a more manageable amount, I began seeking similarities and

differences among the many categories and grouping them together under broader, aggregated, but still data-centric, themes such as "compliance", "responding to callers", "the use of statistics", "open organizational culture", etc. (Gioia et al. 2013: 20). During this process, it became clear that while the documents were relatively consistent in describing the technical details of the hotline (reporting process, protocols for handling complaints, etc.) there was a considerable ambiguity around the aims and prescriptive dimensions of the hotline.

At this point, the analytical process shifted from being mostly inductive, towards a more abductive approach, in which various theories were introduced and read in a continuous back-and-forth process with the data (Alvesson and Kärreman 2007). During this process, the concept of dispositive was brought in, as prescriptive rationalities such as surveillance (discipline) along with the desire to 'manage circulations' (security) emerged as relatively apparent themes throughout the data. During the abductive process, however, an additional, more humanistic imperative ('give employees voice') emerged that could not quite be captured by the concept of security, which eventually led to the introduction of the concept of dialogue. As a result, the three dispositional imperatives of discipline, security and dialogue were subsequently utilized to distill the first order data-centric categories into second order theoretical, researcher-centric concepts. While the concept of dispositive as such is a rather broad term, several scholars (e.g. Dean 2010: 27; Villadsen 2019: 4) have noted how dispositional analysis can be operationalized through the use of one or more specific entry points. Consequently, in the 2nd order analysis (Gioia et al. 2013), emphasis was placed on the rationality and imperative of the whistleblowing hotline. The three codes utilized in the second round of coding were: (1) create a control environment and surveil employees; (2) manage the circulation of risky information; (3) give voice to employees. These codes turned out to be quite exhaustive, as most of the descriptions of whistleblowing hotlines could be categorized under at least one of these imperatives.

The strategy for selecting quotes to be used in the final analysis can be described as "purposeful sampling", in which the researcher can purposefully select information-rich material "from which

one can learn a great deal about issues of central importance to the purpose of the research"
(Patton, 1990: 169). More specifically, the criteria for selecting quotes is the extent to which they
are illustrative of the dispositives used in the analysis (Villadsen, 2006: 101).

Findings

The following section shows how the whistleblowing hotline, as a managerial technique, is
compatible with three heterogeneous dispositional potentials, which each suggest a different
version of its purpose and utility; namely discipline, security and dialogue.

Discipline, control and panoptic surveillance

> "Companies understand that employees are their eyes and ears – i.e. they see and hear
> everything that goes on within the organization, including inappropriate behavior and who
> is involved in perpetrating it" (Deloitte, 2018)".

We begin the dispositional analysis with the above quote from the external hotline provider
Deloitte, and the argument that the whistleblowing hotline can be integrated with the disciplinary
dispositive and function as a disciplinary surveillance technique. Discipline, famously described
by Foucault (1991a), is characterized by surveillance as a technique, which is illustrated through
the classic metaphor of Bentham's Panopticon model, where the inspection-tower in the middle
of the prison makes the inmates feel watched, regardless of whether this is actually the case, and
thus altering their behavior. As such, discipline functions when the subject, as a result of the bare
risk of being surveilled, starts disciplining herself (Foucault, 1991: 201). This preventive potential
of "keeping the eyes and ears open" (Deloitte 2018) is also present in the whistleblowing hotline.
The external hotline provider Global Compliance Inc. (CCI) expresses it the following way in
their own self-description: "CCI was established to help organizations create a control
environment […] which reduces the likelihood of errors or situations of noncompliance." [ix]

Parallel to the Panopticon, the whistleblowing hotline and its 'control environment' obviates the need for excessive management and intervention, as inappropriate behavior is limited through the risk of being surveilled by one's colleagues (Vandekerckhove, 2006: 139). The whistleblowing hotline, according to the external provider Expolink, demonstrates the organization's "zero-tolerance approach to malpractice and wrongdoing" (Expolink 2018: 3). Hence, everyone is potentially watching everyone[x], which can have a preventive effect on immoral conduct such as corruption, fraud etc. (Miethe and Rothschild, 1994: 342). Foucault describes how the panoptic idea basically involves:

> "putting someone in the center -- an eye, a gaze, a principle of surveillance -- who will be able to make its sovereignty function over all the individuals [placed] within this machine of power. To that extent we can say that panopticon is the oldest dream of the oldest sovereign: None of my subjects can escape and none of their actions is unknown to me". (Foucault, 2007: 66)

This panoptic structure also seems to describe certain elements of the whistleblowing hotline as a technique. With the increasing size and complexity of organizations, it has become increasingly difficult for management to assess the organization in its entirety. Hence, the whistleblowing hotline enables management, in spite of these challenges, to maintain some kind of overview of what goes on in the various nooks and crannies of the organization. As expressed by the external hotline provider Expolink:

> "It is impossible for management to constantly monitor their entire operations. By entrusting staff to be guardians of your business, you protect it and help ensure long term success". (Bridgen and Matthewson, 2013: 19)

The panoptic idea, as described by Foucault in the above passage, operates such that no subjects escape the gaze of the sovereign. In the whistleblowing hotline, the sovereign is replaced by the

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employees, who are posited as 'guardians' of the organization. In order to address potential employee concerns about becoming a veritable extension of the 'sovereign eye', Expolink recommends that management use the following phrasing when informing employees about the whistleblowing hotline:

> "Most of your colleagues are fair and honest; your Company knows this. However, a small minority can behave irresponsibly or even commit illegal acts. Your employer understands how difficult it can be for any employee, aware of these situations, to bring them to their attention." (Bridgen and Matthewson, 2013)

This displacement of the management's 'sovereign eye' by the multiple, decentralized gazes of employees, seems to mirror Deleuze's (2006) account of the shift from a society of discipline to a society of control, with the whistleblowing hotline exemplifying the latter. Instead of the surveillance of enclosed spaces, which is the job of discipline, control thus inscribes itself anywhere that criminal or anti-social activity might occur (Rose, 1999: 243). Hence, according to the external provider GotEthics, the whistleblowing hotline provides management with "the tips you need to stop this behavior when it happens" [xi]. The whistleblowing hotline can thus be understood as a strategic diffusion of organizational control, which follows employees through the dynamic and complex flows of the modern organization, enabled by the watchful decentralized gazes of their colleagues.

In its disciplinary version, the whistleblowing hotline then functions as a technique, that enables management to surveil its employees, who in turn start disciplining themselves. This type of organizational control not only runs somewhat counter to the emancipatory potential often associated with whistleblowing and 'speaking up', it also differs markedly from the whistleblowing hotline as manifested in the security dispositive.

Security, circulation and vaccinating against external disclosures

> "A whistleblowing hotline can give an organisation early sight of a potential issue, and reduce the likelihood of potentially damaging information reaching the public domain".[xii]

As shown by the quote above from the external hotline provider Expolink, the whistleblowing hotline also has the potential to function as a security mechanism, which proactively facilitates and circulates the internal flow of potentially damaging information about the organization in ways that reduce risk for the organization – particularly of this information reaching the public domain. In addition to the disciplinary potentials described in the previous section, let us now consider how it might also be permeated by the dispositive of security.

Here, Foucault emphasizes a connection between the security dispositive and a liberal conception of freedom, that emphasizes letting things happen, laissez-faire (Foucault, 2007: 47-49). Along with statistical knowledge, liberalism and its concomitant economic rationality accordingly constitutes the framework around the security dispositive, which has as its focus to control and regulate the circulation of people, diseases, goods, etc. within the population. The problem, then

> "is no longer that of fixing and demarcating the territory, but of allowing circulations to take place, of controlling them, sifting the good and the bad, ensuring that things are always in movement, […] but in such a way that the inherent dangers of this circulation are canceled out." (Foucault, 2007: 65)

Whereas discipline entails an enclosing, fixating categorization, security involves "management of circulations" (Munro, 2012). Hence, the pivotal problem in the security dispositive becomes the question of "How [things] should circulate or not circulate?" (Foucault, 2007: 64) The liberal notion of freedom becomes precisely a freedom of circulation; i.e. the possibility for movement and the circulation of people and things (Foucault, 2007: 48-49). The circulation parameter also

shows up in connection with the whistleblowing hotline, which, according to the external hotline provider Ethic Intelligence "(…) contributes significantly to the company's […] efficiency, furthering the free circulation of information throughout the organization". [xiii]

From the perspective of the security dispositive, the whistleblowing hotline can accordingly be understood as an attempt to establish a form of infrastructure that regulates the circulation of potentially damaging information about the organization. The whistleblowing hotline thus enables the circulation of utterances hitherto out of circulation "due to fear of reprisals" (Horten 2014:2), and installs an effective circulation of the information after the employee has shared it. In this sense, the whistleblowing hotline is described by the popular external hotline provider Navex Global as "a process and not simply an act" (Bridgen and Matthewson, 2013: 1). A process which lasts from the moment "the employee makes a report, to the conclusion and subsequent communication" (Bridgen and Matthewson, 2013: 1). Accordingly, a typical description of a whistleblowing hotline in the Danish Agency for Data Protection will often stress that the purpose of the hotline is to make it possible for information about wrongdoing to be "reported and managed" in a responsible and efficient manner. Consequently, it is not just the reporting of the information that is facilitated by the whistleblowing hotline – it is also the subsequent management of this information. The organization thus coordinates with its external hotline provider, putting in place meticulously specified procedures for the collection, tabulation, and circulation of information, all of which aim at maintaining the utmost level of discretion (Bridgen and Matthewson, 2013: 25-26, 37). At the external hotline provider Expolink, for example, the circulation is initiated when a report is submitted to the anonymous phone-hotline from a whistleblower in one of Expolinks client organizations. Shortly hereafter, this report is sent to one or more pre-approved recipients from the client-organization. The recipient then receives a phone call from Expolink and is asked to give their Personal Identification Number, which must be provided every time a new report is received. After Expolink has spoken on the phone with the authorized recipient from the organization, this recipient receives the

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whistleblower's report through an encrypted email. If no authorized recipients are available, the report is withheld until this is no longer the case. When the report is received by the client, the client will then fax or email a confirmation, after which Expolink will delete the initial submission, making the original caller impossible to retrace.[xiv]. The report then begins its circulation within the organization from which it has originated. Here, too, the circulation is facilitated through meticulous guidelines, defining who will investigate the claims in the report and under what circumstances different persons may have access to the information.

The whistleblowing hotline accordingly provides a certain freedom for information to circulate, while simultaneously regulating this freedom meticulously. In connection to this, Foucault explains how the freedom of circulation in the security dispositive becomes interwoven with "procedures of control, constraint and coercion" (Foucault, 2008: 67). These control mechanisms, however, do not constitute a curtailment of the individual's freedom, because freedom in this liberal form of government, according to Foucault, entails:

> "a new form of government mechanisms with the function of producing, breathing life into, and increasing freedom, of introducing additional freedom through additional control and intervention. That is to say, control is no longer just the necessary counterweight to freedom, as in the case of panopticism, it becomes its mainspring." (Foucault, 2008: 67)

The same mechanism can be seen in the whistleblowing hotline. The hotline affords a new freedom to employees, who are now able to freely express their concerns about unethical or illegal conduct in the organization. This freedom however, is secured through control mechanisms, so as to provide a form of regulated freedom of speech. The whistleblowing hotline makes it possible to control the circulation of certain utterances in the organization, by directing and regulating them, while at the same time providing the freedom for them to be made in the first place. The utterances are thus incorporated into an organizational circuit designed for the specific purpose of circulating information in a way that is both regulated and preferred by the

organization. Contrary to the disciplinary dispositive, security does not initially seek to establish a relationship of obedience between the will of the sovereign and the wills of his subjects. According to Foucault, security instead connects itself with 'natural' processes and phenomena, which it seeks to influence from within. Mechanisms of security thus do not nullify processes in the form of prohibitions such as 'You must not do this' or 'This will not happen', but instead in the form of a progressive self-cancellation of phenomena through these phenomena themselves (Foucault, 2007: 47).

Accordingly, the whistleblowing hotline seeks to connect itself to utterances concerning misconduct in the organization, as they pose a risk to the organization through their potential – prompted by traditional whistleblowing and/or a vigilant press – to cause PR-scandals. Conversely, under the right circumstances, these utterances, if managed properly in the organization, can also be utilized to get the organization back on track before the misconduct has damaging implications in terms of reputation or revenue. For example, the external hotline provider Navex Global describes the whistleblowing hotline as a management tool that allows executives and board members to react to and "spot trends before they result in larger problems that are visible to the general public" (Petry, 2012: 4). The whistleblowing hotline, then, connects itself to the utterances concerning misconduct, and does not seek to regulate them through censoring prohibitions, but instead lets the utterances happen, lets them run their course and circulate, while at the same time defining the conditions under which this circulation may take place.

This confidential protection of the organization against misconduct can be understood as a form of prophylactic minimizing of risk. Risk is a central problematic in the whistleblowing hotline, and is instituted even before the hotline is implemented: organizations are advised by external hotline providers to conduct a "risk-analysis", which can lead to a "more accurate requirements specification" (KPMG, 2011: 4). Relatedly, notions like 'case', 'risk' and 'danger' are important concepts in the mechanisms of security (Foucault, 2007: 60-61). As such, security observes its

object of government, the population, or in this case, the organization, as a natural phenomenon of sorts, which cannot be shaped by decree as in the case of the sovereign, but whose behavior can be calculated, monitored, and to a certain extent modified and regulated (Foucault, 2007: 70-71). Hence, the object of government is comprised of a series of complex and modifiable variables, each of which depends on chance, accidents, individual behavior and various conjunctural causes. The observation of regularity in these variables is rendered possible through statistics, which can be used to calculate series of possible events and determine an average value, which is considered optimal, as well as a set of limits of the acceptable, which must not be exceeded (Foucault, 2007: 5). Similar to this, the whistleblowing hotline renders the organization observable through a series of statistical charts that comprise the reports made to the hotline. According to Expolink, these data have a valuable function to the organization: "If companies don't use the data collected from their whistleblowing hotline reports in a progressive manner (analyzing trends, investigation and resolution, etc.) it negates the benefits of the service considerably" (Bridgen and Matthewson, 2013: 26).

The external hotline providers register data from every submission made to the whistleblowing hotline, including date, time, topic of inquiry etc. This enables the identification of the divisions within the organization that produce the most inquiries – so-called 'hot-spots' (Expolink, 2018). Assessing these hot-spots can provide the basis for subsequent implementation of preventive schemes that can address those issues raised most frequently or which are most problematic. Likewise, the statistical data can provide an overview and general risk assessment of the organization in terms of the most frequent topics of inquiry, the division/country from which they originate, etc. (Bridgen and Matthewson, 2013: 27). The external providers also supply monthly and annual reports on whistleblowing hotline activity, thus giving the organization a continuing overview of reports of improper conduct in the organization. In this way, the utterances become calculable and modifiable to a certain extent, and it becomes possible to

observe and regulate them as a living and circulating object of government, while also reducing the risks associated with allowing this circulation.

This type of regulation of and through circulation can also be observed in connection with smallpox vaccinations in the 16th century, which Foucault characterizes as an emblematic mechanism of security. Rather than trying to prevent the disease, the vaccine becomes a provocation of it, but under conditions such that the nullification of the disease can take place at the same time as the vaccination. The result is that the spread of the disease is restricted: "With the support of this kind of first small, artificially inoculated disease, one could prevent other possible attacks of smallpox" (Foucault, 2007: 59). In other words, a small and artificial dose of the risky and dangerous object of government (a miniscule dose of smallpox) can eliminate the potentially adverse impact of this object in the long term (full-blown smallpox). In our whistleblowing hotline example, the morphology functions like the vaccine. Instigating a 'small, artificially inoculated' whistleblowing-event (i.e. the anonymous reporting to the whistleblowing hotline), thus enables the prevention of the 'disease' in the form of large public scandals, where employees disclose misconduct to external actors such as the media, public authorities, etc. This 'syntheticity' of whistleblowing in the whistleblowing hotline as well as the fact that it seems 'smaller' than traditional whistleblowing, can be accounted for on the basis of the risk, which has traditionally been associated with the term. Traditional whistleblowing accordingly often entails substantial and serious consequences for both the orator and society at large. Consequently, one of the main purposes of the 'artificial' whistleblowing is the reduction of the risk of these serious ramifications. Hence, the curated whistleblowing produced in whistleblowing hotlines has been characterized as 'whistleblowing without whistleblowers' (Alford, 2001: 36).

This extraction of potential risk and harm from the whistleblowing process through the meticulous circulation of potentially harmful information – with the explicit ambition of keeping it out of the public domain – raises the question of whether the whistleblowing hotline should be showcased (as is often the case) on the organizations web-site as a CSR tool for promoting

employee empowerment and free speech; or whether it should be acknowledged as a managerial risk-management tool. To properly account for the former, we now turn to the concept of dialogue as a potential alteration of the security dispositive.

Dialogue, empowerment and enabling conversation

> " We (…) wish to promote a culture based on dialogue. Everyone must feel free to speak out and, to remove any obstacles, we set up a whistleblower scheme."
> (Lundbeck Fonden, 2018)

As the above quote from the Danish pharmaceutical company Lundbeck suggests, there is another potential of the whistleblowing hotline, which has to do with empowering employees to speak up. Hence, according to the external operator Navex Global 'employee willingness to raise issues' is something every manager 'should be proud of' (Navex Global 2014a, p. 2). This aspect of the whistleblowing hotline, which often comes to light when it is described in somewhat celebratory terms, revolves around a concern for the individual employee, who must 'feel secure' (Expolink 2018a) 'encouraged' (Bridgen and Mathewson 2013, p. 40) and 'empowered' (Navex Global 2014b p. 1) to speak up:

> It is crucial that those who dare to talk about ethical dilemmas are praised for their critical, reflexive and independent attitude […] A formalized whistleblowing hotline can contribute greatly to the […] feeling of safety around speaking up"
> (Carstensen and Schmidt 2007, p.2).

This concern cannot be captured through the fixating and controlling impulse of discipline, and only partially through the managed circulations of security. Hence, the emphasis on the individual

employee stands in contrast to the totalizing focus of the security dispositive, which has the entire organizational population as its object of government (Foucault, 2007: 70-71). However, Foucault has famously noted how contemporary power functions through 'a tricky combination [...] of individualization techniques and totalization procedures' (Foucault, 2000, p. 213), and to that end we shall now consider a possible alteration of the security dispositive, which operates on the individual, namely *dialogue*[xv] (Villadsen and Karlsen 2008), and explore its potential for integration with the whistleblowing hotline.

Dialogue, understood as the aim towards a reversal in speech where "those who used to speak are now to fall silent, whereas those who once were silent should now speak" (Villadsen and Karlsen, 2008:345) has accordingly proliferated across organizational populations in recent years, according to a number of Foucauldian scholars (eg. Bager et al., 2016; Banjac, 2017; Bergmann, 2018; Villadsen and Karlsen, 2008). The 'dialogisation' of contemporary organizations is thus characterized by an increasing use of dialogue-based techniques allowing the previously silenced to speak. This strategy of "giving voice to the silent" is seen as part of a more general critique of hierarchical management and arrogant, unaccountable authorities that has emerged during the past 30 years. The critique rests on the assumption that 'disempowered employees', 'clientelized clients', etc. should speak up against coercive management, paternalist treatment and elitist expertise. The emergence of whistleblowing in an organizational context can be interpreted as part of this critique. Ralph Nader, who initially coined the term in the early 1970s, proposed whistleblowing as an antidote to the increasingly powerful organization and its abuse of power towards both employees and society: "The large organization is lord and manor, and most of its employees have been desensitized much as were medieval peasants who never knew they were serfs" (Nader, 1972: 3). Whistleblowing at its origin then, was precisely an attempt to address the problem of disenfranchised employees, who could not speak out against injustices, and to a large

extent, contemporary whistleblowing hotlines purport to carry on this original project of 'giving employees a voice'.

While the whistleblowing hotline does not imply dialogue in the traditional sense of a face-to-face encounter, external operators still stress how the hotline makes it "possible to have an anonymous dialogue with the whistleblower[1]". Furthermore, employees of the external providers who receive calls made through the hotlines of various client organizations, are trained in skills such as "empathy and rapport building", "dealing with distressed or highly emotional callers", "gaining trust through open, relevant questions" as well as "understanding global cultural differences, religious, socio-economic, political and other factors affecting potential reports or attitude"[xvi]. According to Navex Global, it is crucial that these conversations remain 'reporter-centric':

> When thinking about how to communicate with reporters, put yourself in their shoes. They may be upset, afraid, and pessimistic that their report will not be taken seriously. Make sure your tone is empathetic, and express your appreciation for their willingness to come forward. (Navex Global 2014b p.1)

The whistleblowing hotline is accordingly understood as enabling a dialogue (albeit anonymously) with the employee on topics where she has hitherto remained silent.

The central rationale behind dialogue is that speech is more authentic and liberated from power when it comes from a client or employee. This view rests on the assumption that "the silenced is, by definition, oppressed, and that speech is, by definition, liberating" (Villadsen and Karlsen,

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[1] https://www.gotethics.com/whistleblowing

2008: 347). The 'liberation' facilitated by the whistleblowing hotline in its dialogical version is accordingly assumed to increase both the well-being and productivity of the employee:

> When employees experience something as improper, many choose to either hold their tongue or leave. An employee with a gnawing conscience will likely not continue to be an innovative, independent and passionate employee in the long run (…). When it comes to our sense of right and wrong, freedom to speak up is crucial. A whistleblowing hotline (…) is therefore an important tool for an innovative and successful organization. (Carstensen and Schmidt 2007, p. 4)

Similar to the longstanding organizational fixation with self-actualizing employees (eg. McGregor 1960; du Plessis 2020), the emancipatory potential of allowing the silent to speak is thus seen as a potential for organizational success.

Unsurprisingly, however, the "liberation" and "dialogue on equal terms" typically highlighted in dialogue-based techniques does not in itself facilitate a neutral leveling of positions, much less the abolition of leadership and power (Villadsen & Karlsen, 2008: 367). Dialogue, then, is not to be understood as a Habermasian tool for overcoming social conflicts, but instead as something which disposes the domains of speech and action in various ways, all of which have specific power-effects. Accordingly, the idea that those who used to speak should now remain silent and listen, is not to be taken too literally. Rather, the listening is *strategic,* which implies the listener administering his speech in such a manner that he by means of silence urges the previously silenced to speak, and is subsequently able to utilize this speech for various managerial purposes. (Villadsen & Karlsen, 2008: 366). As the external hotline provider Expolink assures its potential clients: "whatever we are told, we will tell you." [xvii] Here we see how the dialogical alteration is

connected to the security dispositive, as the speech of the silent can subsequently be integrated into the managed circulations of information.

The element of strategic listening in the whistleblowing hotline however also seems to mirror the technique of confession (Foucault, 1990), of which the hotline might accordingly be construed as a new variation. Yet, the whistleblowing hotline also deviates from the confession on a crucial point; namely the focus of the latter on getting to the truth about the individual (confessing) subject and his or her innermost thoughts. Hence, neither the dialogical alteration nor the whistleblowing hotline are specifically concerned with facilitating the subjects' confession of its inner life, but are instead more interested in a general movement towards "dialogue" in the sense of creating an environment where those who were previously silent are able to speak their mind on a range of different issues. For example, the Municipality of Copenhagen describes its whistleblowing hotline as follows:

> "The whistleblowing hotline is a supplement to our internal dialogue and transparency. You should always consider if the problem can be solved by, for example, contacting your immediate supervisor, HR-staff or union representative. The whistleblowing hotline is meant as an alternative that can be used in case you do not feel safe using the regular channels of communication." (Københavns Kommune, 2012: 3)

Understood in dialogical terms then, the purpose of the whistleblowing hotline is to facilitate dialogue in situations where more traditional channels of communication and techniques, such as group meetings or 'open business culture' (Expolink 2018) are unsuccessful. As such, the hotline enables a conversation between management and employees, which had hitherto been avoided by the latter. As argued by the Danish external hotline provider Human Time:

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"One often hears phrases like "freedom of speech in the work place" and "open corporate culture" when companies explain why they don't need a whistleblowing hotline. But when it comes down to an actual report of illegal conduct in the workplace […], these phrases can easily retract to the world of theory. Very few employees have the guts to initiate an open dialogue, if they become aware of a colleague not complying with the rules. There are simply too many unfortunate examples of employees being "rewarded" with reprisals or perhaps even a pink slip, if they try to help the company by directing attention to internal illegalities."

(Human Time and Mau, 2013: 1).

Again, we see the connection between the security dispositive and its dialogical alteration, as the potential of whistleblowing hotlines to eliminate barriers against speaking up about misconduct[xviii] can be incorporated into both. In the domain of security, eliminating barriers thus facilitates the circulation of information, whereas the dialogical alteration instead emphasizes how it empowers the silent to speak. In the dialogical version, then, the whistleblowing hotline becomes a supplement to traditional ways of achieving dialogue, as the speech of the silent is promoted and supported in an ever-greater number of settings (Villadsen and Karlsen 2008: 346), and now reaches into areas traditionally associated with fear of retaliation.

As mentioned, dialogical techniques do not function to liberate speech from power, and as such, the dialogue in the whistleblowing hotline is far from free. On the contrary, it is curated and regulated. For instance, the whistleblowing hotline involves an extensive prearranged narrowing of the topics employees can address, such that concerns about working environment, bullying, etc. are typically excluded from the whistleblowing hotline. Instead, the hotline is reserved for topics such as fraud, bribery, forgery and serious breaches of safety-codes.[xix] The speech of the silent is consequently restricted and constrained ahead of its enunciation. Additionally, it is established in advance that the speech must take place via an electronic form or an anonymous phone-hotline, and take the form of an "incident report", where the whistleblower answers a

series of standard questions such as "Is the claim based on first-hand knowledge or a substantiated suspicion?" [xx] and "Please provide all details regarding the alleged violation, including the location of witnesses". [xxi] These questions serve to frame the speech of the employee in specific directions. Moreover, in their continuing request for verification and evidence of any claim, many of the questions can be interpreted as somewhat suspicious of the motives of whistleblower, and whether the claim is made "in good faith" (KMD: 2013). Finally, as mentioned, the newfound possibilities for speaking up also serve the interests of those listening, as the incoming reports enable the smooth running of the organization and the expedient circulation of information.

In summary, the dialogical alteration, as outlined above, can be said to function as a type of individualizing ideological supplement that renders the prosaic risk calculations and managed circulations of the security dispositive more appealing to stakeholders in the organization. It does so by promoting the idea that the whistleblowing hotline empowers employees and 'gives them a voice'. The presence of dialogue as an alteration of security and in addition to discipline, underscores the key figure in this analysis; namely that the whistleblowing hotline as a technique entails the collision of multiple normative orders in the same social space. This ambivalence in turn leads to a number of limitations and dilemmas, which are summarized in the following concluding section.

Discussion

Table 1 here

The table above presents a schematic summary of the distinct dispositional potentials identified as compatible with the whistleblowing hotline as a general technique. Depending on which dispositive, or alteration, permeates it, we can see how the whistleblowing hotline manifests itself differently. In other words, table 1 illustrates the general imperatives which, in a given hotline or

organization, may co-exist and overlap, thus producing ambiguity through their specific interplay. The categories used in the table are inspired by Dean's (2010:27) suggestions of analytical entry points for describing the mode of operation in different dispositives[xxii]. In the following, these entry points are accordingly used to sum up the findings of the study and discuss their implications.

Firstly, the table shows how the whistleblowing hotline can be portrayed through different metaphors, depending on the dispositive permeating it; in its disciplinary version, the whistleblowing hotline functions as a contemporary panoptic technique, where the surveilling gaze of the prison tower is dispersed into vigilant employees mutually watching each other. Security, in contrast, conceives the whistleblowing hotline as a form of vaccination, where the inoculation of a small and "artificial" dose of whistleblowing can protect the organization from major "infections", in the form of public scandals or embarrassing disclosures. Finally, from a dialogical standpoint, the whistleblowing hotline enables a hitherto impossible conversation between management and employees. The dotted lines in the chart around the bottom row signify that in this context, dialogue is understood as a form of humanizing ideological supplement to - or alteration of - the security dispositive.

This plurality of metaphors points toward the problem of why an organization should implement a whistleblowing hotline at all. Disciplining employees through surveillance is thus a very different project than dialogical emancipation and empowerment or the avoidance of public scandals. As such, this amounts to profound tensions and contradictions around what the hotline actually is. Furthermore, the dispositives which seem to have potential for integration with the whistleblowing hotline also interpret the object of government in this technique very differently. Whereas the whistleblowing hotline in the disciplinary dispositive aims its efforts at employee misconduct, the security dispositive focuses on risky information, which might cause harm to the organization, and the dialogical alteration seeks out knowledge that is withheld for fear of reprisals. The object of government thus points towards the specific problem that the

whistleblowing hotline is meant to solve. Where the whistleblowing hotline in its disciplinary version signals a 'zero tolerance' approach to the problem of unlawful or unethical conduct, and (at least in principle) aims towards its complete elimination, the problem for the security dispositive is not misconduct in and of itself, but instead the risk that this misconduct poses to the organization's revenue or reputation. In the security version, then, the whistleblowing hotline is not intended to eliminate misconduct, and may even tolerate its occurrence (see eg. Vandekerchove et.al 2013: 18) to the extent that knowledge of misconduct does not reach the public domain. Of course, in the dialogical version of the whistleblowing hotline, it is not a question of tolerating or not tolerating misconduct, but rather of setting withheld, or silenced, knowledge free in order to enrich the democratic debate in the organization, which will in turn allow the organization to become more innovative and successful.

Practice, which in continuation hereof emphasizes how the whistleblowing hotline manages its object of government, also differs in the three versions. In the disciplinary version, the whistleblowing hotline thus contributes in terms of a surveillance which serves a double purpose; firstly to identify employees violating rules and procedures, and secondly to influence employees to, through the bare knowledge of this surveillance, refrain from any violations. The practice of security on the other hand, is to allow risky information to circulate in specific ways, and through this very circulation, minimize risk. The dialogical practice of listening strategically is akin to the practice of security in that the strategic listening is applied in such a way, that the risk to both whistleblower and organization is minimized, whereby the whistleblower's report contributes to the continued smooth and efficient running of the organization. This similarity suggests that dialogue, in the context of the whistleblowing hotline, might function primarily as an ideological supplement to the security dispositive, where the purpose of minimizing the risk of external disclosures stays intact, but is cloaked in emancipatory rhetoric such as "free speech" and "empowerment" that is more acceptable to employees and stakeholders. Furthermore, this may be an example of how co-existing dispositives (or in this case, a dispositive and its alteration) can

be seen as reinforcing as opposed to conflicting. Hence, the dispositional ambiguity might in this case be strategically leveraged to satisfy multiple stakeholders with different interests. While such leveraging might prove more difficult in relation to the co-existence of an ambition of surveillance and control with that of dialogue and empowerment, we should be open to the possibility, that dispositional co-existence, and the concomitant vagueness and ambiguity, does not necessarily present itself as a limitation, but can also function as a strategic asset (see eg. du Plessis & Vandeskog 2020:7).

In continuation hereof, the figure of the whistleblower is also construed differently in the three dispositional potentials of the whistleblowing hotline. Where the disciplinary dispositive interprets the whistleblower as a guardian, who ensures that her colleagues will not commit offences against the organization, the whistleblower in the security dispositive is conceived as a risk, as she possesses risky and potentially dangerous information about the organization. And finally, in the dialogical alteration, the whistleblower is seen as an emancipated employee, who speaks up on issues where she previously held her tongue due to fear of reprisals. It should be noted here that these conceptions of the whistleblower are quite different from the way in which famous whistleblowers in the traditional sense, such as Edward Snowden and Chelsea Manning are generally perceived in the public debate. These figures are typically framed through hero- and traitor narratives (Quin 2015). The whistleblowing hotline and its concomitant permeating dispositional logics thus ascribe to the whistleblower a set of subject-categories that point in quite different directions than the traditional hero/traitor frames. This may also explain why whistleblowing hotlines, as already mentioned, have been referred to as 'whistleblowing without whistleblowers'. If we, in a similar vein, imagine that Snowden or Manning had disclosed their knowledge through a whistleblowing hotline, it is arguably unlikely that it would have shaped their respective lives and identities in the same way, just as their messages would probably not have had the same effect on the practices they were criticizing, or on the general democratic debate around these practices. In fact, Snowden, discouraged by the lack of results from previous

cases of internal whistleblowing at the NSA, deliberately chose to avoid formal whistleblowing channels (Munro, 2018: 115). This illustrates a key limitation of the whistleblowing hotline, which will be discussed in the following.

The dispositional ambivalence of the whistleblowing hotline is perhaps most clearly spelled out in the different imperatives of government that permeate it. Whereas the whistleblowing hotline in its disciplinary format seeks to produce obedient employees, who will not violate the rules and regulations of the organization, the security dispositive acknowledges the futility of such an undertaking, and instead conceives violations as a form of information that carries with it a potential risk of external disclosures, which accordingly must be minimized. Finally, dialogue has a completely different aim, as the dialogical whistleblowing hotline functions as a tool for empowering employees to speak up, so as to ensure that previously withheld utterances can now be articulated without fear of retaliation. This dispositional ambivalence and the fact that the whistleblowing hotline can accommodate to diverse managerial styles (see also Loyens, 2013) - be they strict, disciplinary zero-tolerance approaches, liberal laizzes-faire management, or humanistic and empowerment-oriented management-styles – raises the question of the extent to which the whistleblowing hotline is simply an artifact of the prevailing managerial style. While such questions lie outside the empirical scope of this paper, there nevertheless seems to be a recurring limitation in the whistleblowing hotline, which cuts across dispositional strategies and managerial styles: the secrecy and safe-guarding around the reported information, and the exclusion of the public from the whistleblower-equation. Hotlines, which we could envision as 'alternative' (e.g. Parker, Cheney, Fournier and Land, 2014) might on the contrary seek to incorporate employees, civil society groups or even randomly selected members of the public as 'designated recipients', who under certain circumstances could notify the public or take other appropriate action on the basis of a report, should the organization fail to do so (du Plessis, 2015). However, the fact that such extensions of the whistleblowing hotline, which would arguably increase its democratic legitimacy, remain rare (though see Loyens and Vandekerckhove, 2018), perhaps speaks to an

inherent limitation in the internal hotline; namely, the aspiration to limit the number of recipients of the whistleblowing report to a minimum. Where whistleblowing in its classical conception as a practice of 'speaking truth to power' is associated with values such as democracy and public interest (e.g., Habermas, 2013), the whistleblowing hotline, in its ambition to restrict and channel the reach of the whistleblower's message, can thus be argued to run counter to these public values. In the case of the whistleblowing hotline, it seems that 'speaking truth through power' means that power, whether manifested through discipline, security or dialogue, works by enclosing the truth within narrow circles of knowledge and action, thereby limiting both the diffusion of this knowledge and its impact. The whistleblowing hotline thus represents a significant departure from Ralph Nader's classical conception of whistleblowing as resulting from a conflict between the organization and broader society, and the whistleblower's loyalty toward the latter (Nader, 1972: 1). This dissonance is so extensive that it raises the question of whether the whistleblowing hotline is in fact deserving of its name. Perhaps it would be more fitting to acknowledge the whistleblowing hotline as a management tool, and name it accordingly. Of course, then the problem of the differing managerial potentials immediately arises. Because is it then a control/compliance tool, a risk management device or an empowering speak-up technique?

Conclusion

This paper has shown how the internal whistleblowing hotline, conceived as a general technique aimed at facilitating the speaking of truth through power, is potentially compatible with multiple heterogeneous dispositives in the form of discipline, security and dialogue as an alteration of the latter. As such, each dispositive prescribes, or disposes, the hotline in a different manner, leading to tensions and contradictions around the purpose and utility of the hotline. These tensions and contradictions have remained largely unacknowledged in existing research. Where the majority of research on internal whistleblowing treats the hotline pragmatically, as a convenient tool for more

efficient management, and consequently often abstains from critically questioning the hotline as a managerial technique, this study has sought to supplement the prescriptive and optimistic accounts of internal hotlines with a critically descriptive approach. Through the application of dispositional analysis, the paper has shown how different social dispositions and inclinations interact with the whistleblowing hotline as a technique, thereby elucidating the general conditions under which it is implemented and managed in the organization. As such, the paper contributes to the development of organizational dispositional analysis as a means of exploring social heterogeneity and indeterminacy in government, and presents a contemporary empirical example of the underexplored concept of dispositional co-existence. The whistleblower hotline is thus an example of how multiple dispositives can permeate the same problem or technique.

As dispositional analysis lends itself to the analysis of the programmatic and prescriptive level, the empirical data chosen for this study is also programmatic and prescriptive. Hence, this study is concerned with the whistleblowing hotline as a general technique, as opposed to a specific, organizationally situated phenomenon. As such, I have chosen not to investigate the specific interplay of dispositives in any particular whistleblowing hotline. Instead, I have presented a general overview of dispositional potentials, which can hopefully inspire future studies into how the co-existence of different dispositives manifests itself in particular hotlines and organizations. Relatedly, the many variations of how internal hotlines are set up with regard to anonymity, confidentiality and specific reporting procedures may also play a role in affecting the specific dispositional constellation. In the case of the whistleblowing hotline, such detailed studies are likely to be complicated, however, by concerns for data-protection and general discretion on the part of the organization. Future studies might also take a cue from such complications and examine the whistleblowing hotline from the perspective of organizational secrecy (Grey and Costas 2016), which, as we have seen, plays a crucial role in the technicality of the whistleblowing hotline, regardless of the dispositive permeating it.

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Big Data and the Internet".

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i The term "internal" is used here in order to distinguish it from "external" hotlines (Vandekerckhove 2010), in which the information becomes known to an agent acting on behalf of wider society, such as NGOs, whistleblowing agencies or an Ombudsman (see eg. Loyens & Vandekerckhove, 2018). While some external hotlines have been implemented in the Danish public sector, the vast majority of hotlines in Danish organizations are internal, and hence the study limits itself to study the latter.

ii http://jyllands-posten.dk/debat/breve/article4726487.ece

iii http://journalisten.dk/nu-har-fire-fagblade-afvist-whistleblower-annonce

iv http://www.dr.dk/nyheder/regionale/syd/ftf-kommunerne-boer-indfoere-whistleblowerordning

v 'Speaking truth to power', though often associated with *parrhesia,* is not a term used by Foucault himself, and as pointed out by Maxwell (2019: 119) among others, the popularization of the term actually has Quaker origins. For Foucault of course, "truth isn't outside of power" (Foucault, 1979: 131) but in a sense spoken 'through' power in the form of discourses, knowledge regimes, subject positions etc. In this paper however, the word 'through' is used to denote how the whistleblowing hotline represents a somewhat more tangible and intentional form of 'speaking through power', than the diffuse and constitutive power-relations typically associated with Foucault; namely how the whistleblower actually speaks through a mechanism of power purposefully set up and controlled by an authority. As such, 'speaking through' is here intended to capture the difference between institutionally supported internal whistleblowing and its more traditional and external counterparts by referencing the term 'speaking truth to power', commonly used to describe the latter.

vi While the hotline provider is technically an "external" firm, the whistleblowing hotline is still considered "internal" whistleblowing, as the hotline provider merely functions as an intermediary through which the internal whistle is blown.

vii On the Danish market, the most popular are *Expolink* and *Navex Global*.

viii https://www.datatilsynet.dk/presse-og-nyheder/nyhedsarkiv/2018/maj/den-generelle-anmeldelsesordning-ophoerer/

ix http://www.complianceconcepts.com/www/default.asp

x Peer surveillance cannot be regarded as strictly panoptic, as the panoptic relation is fundamentally hierarchical. Concepts such as 'liquid surveillance' (Bauman 2013) or 'synopticism' (Lyon 2016) might thus be more accurate for describing this particular element of the whistleblowing system.

xi https://www.gotethics.com/whistleblowing

xii https://www.expolink.co.uk/whistleblowing-hotline/what-is-a-whistleblowing-hotline/

xiii https://www.ethic-intelligence.com/en/experts-corner/international-experts/137-how-best-to-go-about implementing-a-whistleblowing-program.html

xiv http://www.expolink.co.uk/whistleblowing/whistleblowing-hotline-call-processes-and-reporting-systems/

xv Villadsen and Karslen refer to dialogue as a "governmental technology". If we understand this term as as synonymous with "dispositive" as is sometimes the case (eg. Villadsen 2013; Dean & Villadsen 2016) then one could view dialogue as a new and distinct dispositive. This would be a somewhat bold claim, of which the empirical and theoretical validity is by no means settled. As such questions lie outside the scope of this paper, "dialogue" in this paper will be treated as an alteration of, or supplement to, the security dispositive.

xvi http://expolink.co.uk/whistleblowing/whistleblowing-hotline-call-processes-and-reporting-systems/.

xvii http://expolink.co.uk/whistleblowing/whistleblowing-hotline-call-processes-and-reporting-systems/.

xviii Some survey-based studies have suggested that more people refrain from speaking up not because they are afraid of retaliation, but because they do not think anything will be done about it (Brown et al., 2016; Transparency International Ireland, 2017).

xix See forexample http://www.datatilsynet.dk/blanketter/vejledninger/whistleblower/

xx https://kk.whistleblowernetwork.net/Issues/

xxi https://secure.ethicspoint.com/lrn/en/report_information.asp

xxii Dean uses the term 'regime of practices' which is essentially synonymous with dispositive (Andersen, 2003:27).