



UNITED REPUBLIC OF TANZANIA  
PUBLIC PROCUREMENT REGULATORY AUTHORITY



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Zooming in and out: Investigation into  
whistleblowing in Tanzania public procurement



Public Procurement Regulatory Authority

JUNE, 2024

## RESEARCH NOTE

This survey report is published under the responsibility of the Public Procurement Regulatory Authority (PPRA). The opinions expressed and the arguments employed herein do not necessarily reflect the official views of PPRA.

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On May 20, 2024, Mr. Eliakim C. Maswi, the Director General of PPRA, underscored to the panelists invited for a discussion on whistleblowing the persistence of unethical behavior and corruption practices as significant challenges in public procurement. His notable remarks align with the findings of the procurement compliance audit for the financial year 2022/2023 conducted by PPRA. This audit revealed 143 contracts worth USD 277.86 million with corruption red flags across 49 procuring entities. Mr. Eliakim C. Maswi has emphasized the urgency for citizen engagement to eradicate corruption from Tanzania's Public Procurement. We must heed his call for citizen engagement, as it underscores the imperative need for enhancing whistleblowing mechanisms in public procurement.

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## List of Abbreviations

AO	Accounting Officer
CAG	Controller and Auditor General
EO	Economic Operators
IA	Internal Auditor
OECD	Organization for economic development
PCCB	Prevention and Combating of Corruption Bureau
PE	Procuring entity
PMU	Procurement Management Unit
PPA	Public Procurement Act
PPR	Public Procurement Regulations
PPRA	Public Procurement Regulatory Authority
PSPTB	Procurement and Supplies Professional and Technician Board
TMDA	Tanzania Medicines and Medical Devices Authority

## Key Facts

**67.4%**

the percentage of respondents who believe that regular feedback on the raised wrongdoings is not provided

**42%**

the percentage of respondents who are unaware of the existence of PPRA whistleblowing Guidelines

**66%**

the percentage of respondents who feel safe to report wrongdoings in public procurement as whistleblower

1,572

number of respondents participated in the whistleblowing survey

40%

percentage of people who thinks proper action will not be taken if they raise a concern about the wrongdoings in public procurement

50%

percentage of participants who stated that they feel encouraged to expose misconduct in public procurement by becoming whistleblowers, yet they lacked knowledge of the appropriate route/channel to voice their concerns

07

annual average number of wrongdoings in public procurement raised through whistleblowing over the past five years

## Executive Summary

**The escalating number of legislations regulating and overseeing ethical conduct in public procurement highlights the significance of addressing misconduct in this area.** Alongside the incorporation of ethical provisions and prohibitions in the Public Procurement Act CAP 410, 2023 (Part 9 and 10), there exists a code of ethics and behavior for Public Officials and Tenderers involved in Public Procurement GN No. 804 of 2021. However, additional regulations such as the Prevention and Combating Corruption Bureau Act CAP 339 (R.E. 2022) and Public Leadership Code of Ethics Act CAP 398 (R.E. 2020) largely cover the handling of misconduct and corruption in public procurement. This endeavor is undeniable considering that public procurement makes up nearly 70% of total government expenditures in developing countries. Public procurement remains a primary avenue through which public funds are utilized to deliver public services. Notably, The Government of the Republic of Tanzania allocates almost 70% of its budget to public procurement, with approximately USD 10.07 billion planned for the procurement of goods, works, or services in the financial year 2023/24, representing around 61% of its total budget.

**Despite efforts to reform and enact legislation regulating public officials and tenderers involved in public procurement, unethical behaviors, corruption and fraud remain significant issues within Tanzania's public procurement system.** For example, between 2018/2019 and 2022/2023, 256 individuals faced prosecution for various corruption-related offences in procurement, with 71 being convicted and receiving fines, imprisonment, or both (PCCB, 2024). Corruption in procurement is not limited to local tenderers but also extends to international companies seeking opportunities in Tanzania's public procurement sector. A recent report highlights SAP Global, a software company, agreeing to pay a USD 100 million fine as imposed by the U.S. Securities and Exchange Commission for engaging in bribery to secure procurement contracts in countries such as South Africa, Tanzania, Malawi, Ghana, Kenya, Indonesia, and Azerbaijan.

**Unethical behavior remains a persistent issue, highlighting the necessity for citizen involvement in uncovering corruption within public procurement.** The utilization of whistleblowing serves as a crucial avenue for engaging citizens in revealing corrupt

practices during various stages of procurement processes. Recognizing the advantages of whistleblowing, the Government of Tanzania has developed the Whistleblowing and Protection Act CAP 446 (R.E. 2022) to promote a culture of whistleblowing in public services and safeguard individuals who disclose misconduct as outlined in the legislation. Additionally, PPRA has taken steps to underscore the significance of whistleblowing in public procurement by introducing whistleblowing guidelines in 2021.

**Despite the efforts to develop the Whistleblowing Act and guidelines, the wrongdoings in public procurement raised through whistleblowing are not as compelling as the efforts made by PPRA.** For example, PPRA typically receives an average of 7 reports of misconduct raised through whistleblowing each year over the last five years. As a result, this survey aimed to investigate public procurement stakeholders' awareness of the whistleblowing guidelines, safety and encouragement in whistleblowing, and the extent to which regular feedback and actions are provided for concerns raised through whistleblowing. The study utilized online surveys and panel discussions for data collection. A total of 1,572 usable responses were gathered, with 961 of these responses, equivalent to 61%, coming from economic operators.

## **Key Findings**

**Key Finding 1:** 42% of the participants (659 out of 1,572) are unaware of the existence of the PPRA whistleblowing Guidelines, 2021

**Key Finding 2:** Failure to giving regular feedback on the raised concerns was supported by 67.4% of the responses received from 608 participants across procuring entities and 60% of the responses received from 960 participants from economic operators.

**Key Finding 3:** 50% of respondents are either not sure or unaware of the route to take in case they need to raise concerns about wrongdoings in public procurement as whistleblowers.

**Key Finding 4:** 38.8% of the participants are unaware of the type of wrongdoings in public procurement that should be reported through whistleblowing.

**Key Findings 5:** Men (71.9%) are less encouraged than women (73.1%) to report wrongdoings in public procurement as whistleblowers. Likewise, youth (76%) and

working age groups (76%) are more encouraged than other age groups to report wrongdoings in public procurement as whistleblowers.

**Key Finding 6:** 63.6% of respondents who are encouraged to report wrongdoings in public procurement as whistleblowers are unaware of the PPRA whistleblowing Guidelines of 2021.

### **Key Recommendations**

**Key Recommendation 1:** Increased public awareness of whistleblowing in public procurement requires PPRA to invest in awareness campaigns, offer trainings to its team, and create incentive mechanisms to reward those who report wrongdoings in public procurement.

**Key Recommendations 2:** PPRA should work together with other competent authorities and encourage them to disclose all concerns raised, even if no wrongdoing is discovered after an investigation in public procurement.

**Key Recommendations 3:** Improved whistleblowing in public procurement requires PPRA and other competent authorities to consistently offer timely feedback on cases reported by whistleblowers and improve whistleblower protection.

**Key Recommendations 4:** Enhancing whistleblowing in public procurement necessitates the active involvement of citizens throughout the project implementation phase, particularly those residing near the project. PPRA should establish teams of social procurement watchdogs (whistleblowers) to assist in reporting misconduct in public procurement.

## 1 Introduction

Public procurement is a significant contributor to global spending. The World Bank (2019) estimates that public procurement spends 11 trillion US dollars annually (World Bank, 2018). It represents around 5-20% of the GDP for most countries in the Organization for Economic Development (OECD, 2017). Because of the substantial financial resources involved in public procurement, it has become a magnet for widespread corruption and malfeasance (Basheka, 2021). To address this misconduct, governments around the world have made significant efforts to prevent the improper use of public funds and ensure the proper appreciation of their value by taking several initiatives (Mchopa *et al.*, 2024).

One of the initiatives taken by the government is the implementation of a whistleblowing mechanism (Sama, 2014). Whistleblowing refers to the action of an individual revealing illegal or unethical behavior to higher-level management within the organization (internal whistleblowing) or to external authorities (external whistleblowing) (Handayani and Helmayunita, 2019). The person who reports the fraudulent action is often known as a whistleblower. Whistleblowing in public procurement is greatly beneficial as it involves exposing misconduct to the relevant authorities (Tumuramye *et al.*, 2018). By revealing the misconduct, it facilitates the authorities in implementing the required actions, so effectively deterring the embezzlement of public funds (Sama, 2014; Handayani and Helmayunita, 2019).

However, whistleblowing is not a simple undertaking; it requires significant encouragement (Tumuramye *et al.*, 2018). Studies show that raising public awareness about whistleblowing is a critical factor that impacts whistleblowing (Sama, 2014; Periansya *et al.*, 2023). Furthermore, it is imperative to ensure sufficient security measures for whistleblowers, such as implementing a robust reporting procedure and similar safeguards (Gottschalk and Smith, 2016). Studies reveal that the perpetrators sporadically harassed those who exposed wrongdoing even resulting in their fatalities (Tumuramye *et al.*, 2018). A significant number of specialists placed an undue amount of importance on the factor of motive when it came to whistleblowers (Periansya *et al.*, 2023). Nevertheless, a different academic challenges this procedure, as articulated

by Gottschalk & Smith (2016) who asserts that public whistleblowers are not entitled to incentives. Stieger (2012) suggests that offering monetary rewards to individuals who uncover instances of public misconduct is an effective approach that directly addresses the underlying cause of public corruption. Also, communicating the outcomes of the actions taken in response to the information disclosed by whistleblowers and the broader public is emphasized as a crucial aspect that impacts the culture of whistleblowing in the community (Banisar, 2011).

Recognizing the significance of whistleblowing as a means to eradicate corruption in the form of misappropriation in public procurement, which is documented annually in the audit reports from the PPRA and CAG reports. The United Republic of Tanzania enacted the Whistleblower Act in 2022. Similarly, the Public Procurement Regulatory Authority in 2021 established the Whistleblower Guidelines, which aim to provide guidance on the proper implementation of whistleblowing in public procurement. Despite the efforts made by the Authorities, the number of reported cases of wrongdoing in public procurement through whistleblowing is very small. Records indicate an average of 7.0% of cases reported per year (PPRA, 2024). Regrettably, there is a limited number of studies that have investigated the underlying factors contributing to this situation in the United Republic of Tanzania. Hence, the aim of this study was to examine the reasons behind the underreporting of misconduct in public procurement through whistleblowing in Tanzania and provide potential strategies to enhance the situation. Specifically, the survey aimed to answer the following research questions.

- i) Are key procurement stakeholders aware of the wrongdoings in public procurement that whistleblowers need to bring to light?
- ii) Is the public encouraged to raise concerns about public procurement through whistleblowing?
- iii) Do procurement stakeholders feel safe raising concerns through whistleblowing in public procurement?
- iv) Is whistleblowing-based feedback provided promptly and appropriately on reported public procurement concerns?
- v) Do procurement stakeholders know that there is whistleblowing guideline under the PPRA of 2021?

## 2 Literature Review

Whistleblowing is an act of raising concern about wrongdoing or malpractice connected to public procurement with a public interest aspect (PPA CAP 446, R.E 2022; PPRA Guidelines, 2021). Whistleblowing has been utilized as a method for disclosing corruption in public procurement (Sama, 2014). Choosing to become a whistleblower presents a difficult ethical quandary, since it requires deciding whether to expose or keep hidden the fraudulent activity (Bagustianto, 2014). Hence, the matter of cultivating awareness regarding the significance of whistleblowing is a crucial factor that motivates whistleblowers to recognize its relevance in promoting national development through the exposure of fraudulent activities that impact public expenditures (Periansya *et al.*, 2023). They contend that the participation of the general public in whistleblowing endeavors will aid the relevant authorities in promptly receiving information about misconduct and enable them to take corrective measures before the issue escalates (Ceva and Bocchiola, 2020).

There is a need for a comprehensive guideline that clearly outlines the requirements for reporting whistleblowing incidents and what should not be reported (Periansya *et al.*, 2023). In addition to that, the whistleblowing guideline will outline the measures taken to safeguard whistleblowers from reprisal for exposing wrongdoing, an issue of great concern raised by numerous scholars. For example, in Uganda, there were cases where whistleblowers who exposed wrongdoing lost their lives as a result of retaliation by the perpetrators (Tumuramyé *et al.*, 2018). Given the utmost significance of ensuring the safety of the whistleblower, experts have advocated for various strategies that prioritize the whistleblower's protection (Banisar, 2011). For instance, they advocate for the establishment of an anonymous whistleblower mechanism alongside a whistleblower system that clearly outlines the rights afforded to whistleblowers and the channels via which misconduct in public procurement should be reported and safeguarded (Chalouat *et al.*, 2019).

The question of incentivizing whistleblowers in different domains necessitates meticulous deliberation, given the divergent viewpoints expressed in previous studies. Several studies have found that incentivizing whistleblowers to expose misconduct is efficacious, while there are dissenting opinions (Boydell, 2018). Another crucial part of whistleblowing is the provision of feedback to the individuals who disclose instances of misconduct. Researchers have shown the need of receiving feedback to determine the impact of the information provided by whistleblowers (Kumar and Santoro, 2017). Offering feedback to whistleblowers establishes a consistent habit of recognizing their contributions, so cultivating a feeling of acknowledgement and motivating their ongoing participation in reporting instances of malfeasance in the future (Richardson and Garner, 2022).

Furthermore, scholars hold divergent views on which gender is more inclined to report based on their gender. Richardson (2014) shows that gender has minimal impact on individuals' inclination to report fraud. Omojuyigbe (2009) and Sloan (2011) argue that men

are more motivated to engage in whistleblower activities to report misconduct than women. Nevertheless, Fapohunda and Tinuke (2016) revealed that there are no noteworthy disparities between genders in terms of the social and emotional aspects that impact the inclination to blow the whistle. Similarly, scholars have differing opinions on the age group that is more encouraged to participate in whistleblowing activities in public procurement (Valentin Fischer, 2023). Some scholars argue that younger individuals are more encouraged to engage in whistleblowing, while others believe that older individuals are more encouraged than younger ones (Kostić and Bošković, 2022)

Based on this analysis, it is noted that past research has yielded conflicting results about the factors that drive reporting of whistleblower activities in public procurement. This has prompted PPRA to conduct an investigation to identify the factors that motivate the general public to engage in whistleblowing activities, specifically in the context of public procurement in Tanzania.

### 3 Methodological Approach

#### 3.1 Research Methods

The *whistleblowing Survey Report* is informed by primary and secondary research including:

A literature review and analysis of multiple sources published on the topic of whistleblowing in public procurements, guidelines, and relevant documents.

An online Stakeholder Survey of **1,572** public procurement stakeholders. The survey targeted a broad range of stakeholders from economic operators (suppliers, contractors, service providers) to local public authorities, parastatal authorities, ministries, departments, and Agencies involved in public procurement.

A questionnaire that assessed whistleblowing in public procurement was pretested by 35 practitioners in public procurement.

A panel discussion with experts representing public officials, and economic operators from different sectors. These offer reflections, anecdotes, and observations about how

the analytical results connect with existing literature.

Recommendations that draw on the Stakeholder Survey and National Government Questionnaire findings, interview results, and information contained in the literature.

Recommendations from procuring entities with whistleblowing guidelines highlight their initiatives on improving whistleblowing.



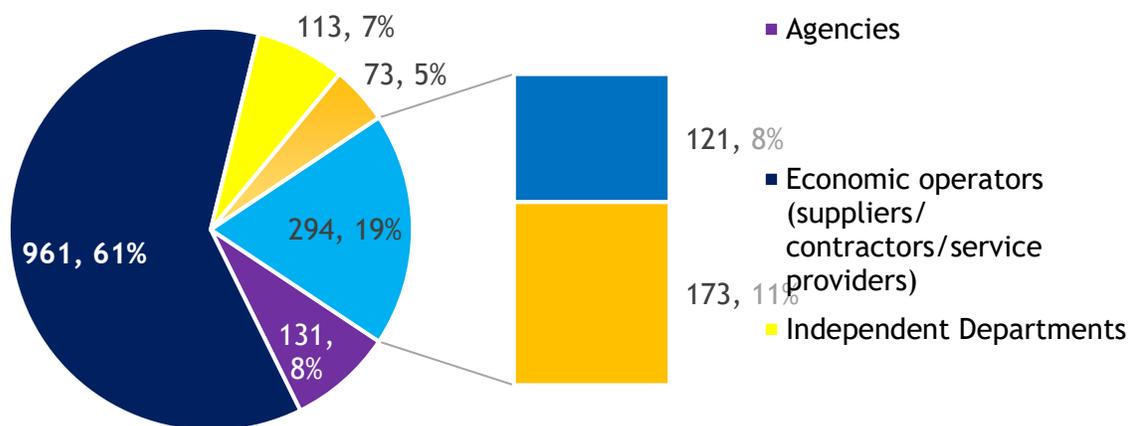
### 3.2 Data Collection

Data was collected in April 2024. A questionnaire, tested for its clarity and validity by 35 practitioners, was utilized for data collection. An online survey link<sup>1</sup> using Google Forms was distributed to 5,000 procurement stakeholders registered in the National Electronic Procurement System (NeST). A total of 1,572 usable responses were gathered, equivalent to 31.44%, indicating that the sample falls within the recommended threshold of 30% for online surveys (Livingston and Wislar, 2012).

### 3.3 Survey Respondents

A total of 1,572 individual stakeholders participated in the survey, all of whom were taken into account for the analysis. The survey included a variety of participants from different organizations and professions, demonstrating the wide scope and interdisciplinary nature of public procurement. Out of the total responses, 961 (61%) came from economic operators such as suppliers, contractors, and service providers, while 611 (39%) were from procuring entities. Most respondents from procuring entities belonged to ministries (19%) and local authorities (11%).

Figure 2: Distribution of PEs participated in this survey where 61% were Economic Operators and 19% from different ministries.



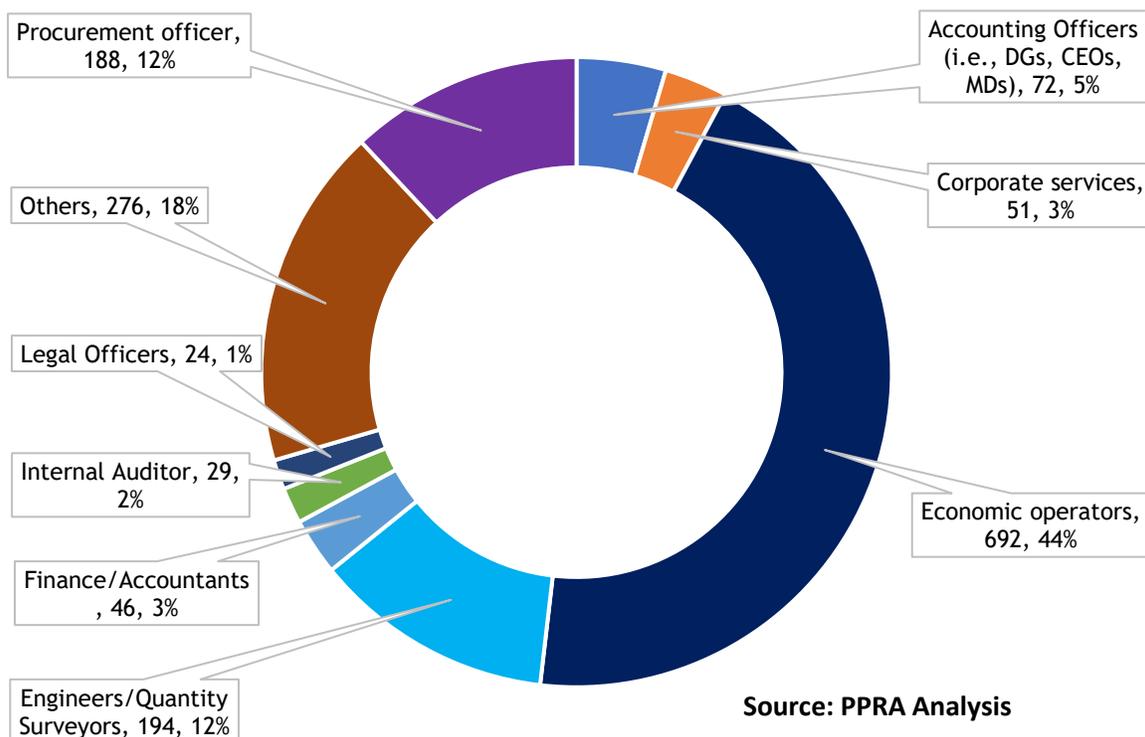
Source: PPRA Survey Analysis

<sup>1</sup> A survey link which is now closed for collecting further information can be found at <https://docs.google.com/forms/d/e/1FAIpQLSdk6H1>

[v4nnsslsOdRqXqYnAcETg4z9vsMvLXjQVxI9XhfrvCg/vi](https://docs.google.com/forms/d/e/1FAIpQLSdk6H1)  
[ewform?usp=sf\\_link](https://docs.google.com/forms/d/e/1FAIpQLSdk6H1)

Besides, most of the respondents across procuring entities reported working either in economic operations (44%), engineering (12%), or procurement (12%), the remainder worked in areas such as corporate services (3%), legal, internal audit, directors and finance.

**Figure 3: Distribution of professionals participated in this survey**



### 3.4 Pannel Discussion

We conducted a panel discussion in May 2024 with representatives from PPRA staff and various public officials from competent bodies such as the Prevention and Combating of Corruption Bureau (PCCB), President's Office, Public Service Management and Good Governance, Ministry of Finance, Procurement and Supplies Professional and Technician Board (PSPTB), and

Ethics Secretariat. In addition, economic operators and special groups (e.g., marginalized groups) were also part of the panel to gain insights into whistleblowing experiences. PPRA staff attendees included the designated officer for internal whistleblowing guidelines, the legal services director, the Chief Internal Auditor, and other managers familiar with engaging

whistleblowers who have reported wrongdoings in public procurement to PPRA from the fiscal year 2019/2020 onwards. Despite receiving the preliminary survey analysis results, the panel discussion aimed to gather more information on whistleblowing by seeking perspectives on survey questions from the panelists during the discussion.

The panelists shared their viewpoints during the discussion, which were

compared with the survey results and relevant documents like the Protection and Whistleblowing Act CAP 446 (R.E. 2022) and whistleblowing guidelines (e.g., PPRA, PCCB, and TMDA whistleblowing guidelines) from their respective competent authorities. Ultimately, the panelists' opinions were integrated into the final analysis of the study, contributing to the formulation of recommendations based on the survey findings.



Whistleblowing Panelist during discussion - Photo: PPRA, May 2024

### 3.5 Data analysis

Various quantitative and qualitative methods were utilized in this study for data analysis. The initial step involved analyzing the survey data gathered through an online survey conducted via Google Forms. A thorough descriptive analysis was conducted on the questions pertaining to the Likert scale using sophisticated spreadsheet software. Additionally, Nvivo qualitative software was employed to analyze the open-ended questions, focusing on word clustering and correlation to develop key themes. Moreover, content analysis was applied to the transcripts from panel discussions and secondary documents such as guidelines and laws to extract meaningful themes and validate the statistical findings.



Mr. Eliakim C. Maswi (middle), Director General PPRA addressing the whistleblowing Panelist during discussion - Photo: PPRA, May 2024

## 4 Findings and Discussion

This section presents the results of the analysis of both quantitative and analysis data collected during the survey. Each finding obtained from the analysis is supported by the statistical evidence.

### 4.1 Awareness of PPRA whistleblowing guidelines of 2021

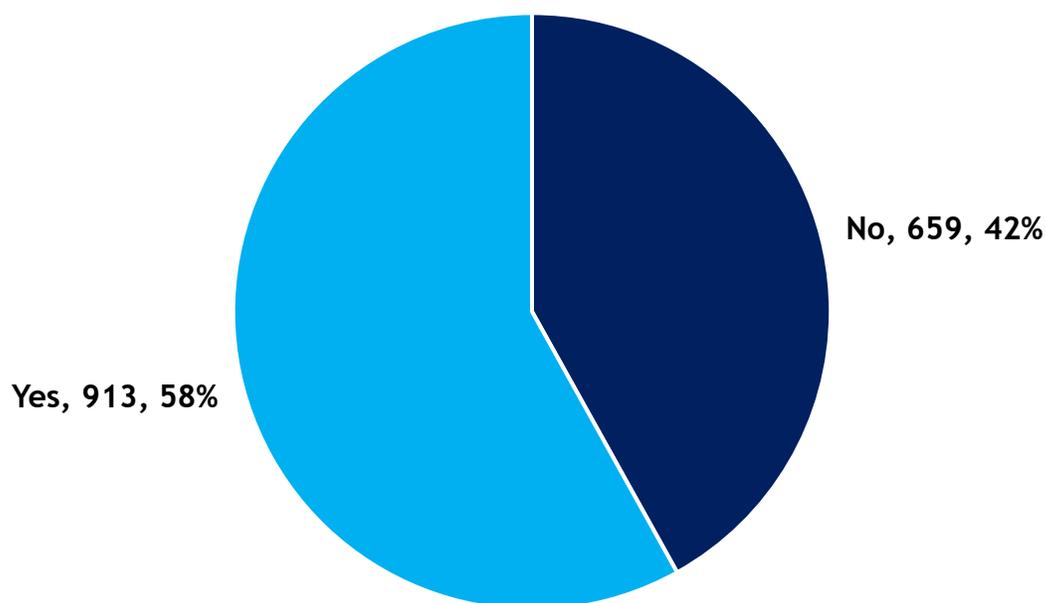
In 2021, PPRA established a special whistleblowing guideline, aiming to provide a platform for whistleblowers to report wrongdoing related to public procurement, enable the Authority to take action on reporting the wrongdoings, to enable the Authority to bring the culprits to the attention of the competent authorities for appropriate action and lastly. to enable the Authority to exercise its mandate of ensuring value for money procurement standard and practices. Not only that but also the guideline has tried its best to explain the wrongdoing that might be reported through whistleblower in public procurement. For instance; failure of the procurement officer or bidder to comply with the requirement of the PPA, 2011 and its regulations, failure of the procurement officer or supplier, contract and services provider to comply with terms and condition of the contract, misrepresenting of qualification of bidder during the tendering process, award a contract to

unqualified bidder, award a contract to a bidder rather than the lowest evaluated bidder or other than highest evaluated bidders in case of collection of revenue, payment to unrendered services , undelivered goods, non-exiting works, procurement with corruption of corruption red flag, issuance of tender document with discretionary information to bidders and like. Thus, this investigation aimed at knowing if the public procurement stakeholders are aware of the existing PPRA whistleblowing guidelines for 2021. **The results as indicated in Figure 4.1 reveal that 58% of respondents were aware of the existing of PPRA whistleblowing guidelines, while 42% of respondents were unaware of the existing of PPRA whistleblowing guidelines.** It is evident that a majority of the participants are knowledgeable about the whistleblowing guidelines in place. Nevertheless, the significance of the percentage representing unawareness of the PPRA guidelines

should not be underestimated. This percentage indicates that a considerable number of stakeholders, despite potentially being impacted by any form of misconduct outlined in the guidelines, may not be able to report it.

This situation could impede the efforts of PPRA and other relevant authorities in combating irregularities in public procurement.

**Figure 4.1 Awareness of PPRA whistleblowing guidelines**



#### 4.2 Route of Raising Wrongdoings in Public Procurement

The PPRA whistleblowing guidelines of 2021 explain the route that whistleblowers need to follow when reporting wrongdoing in relation to public procurement. The guideline stipulates in clause 9 that whistleblowers have the option to report wrongdoing orally, in writing, or through signal language. A

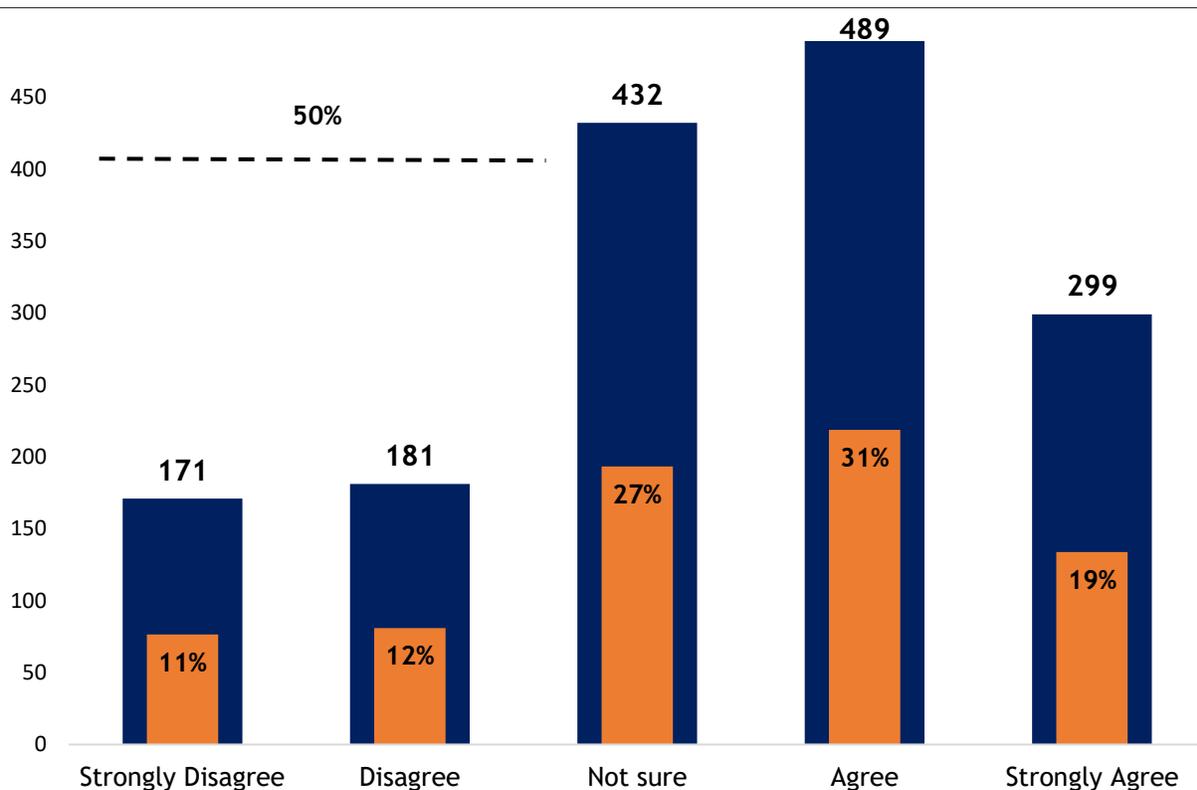
whistleblower can use e-mail, phone call, text message, mail, letter, and physical visit to the authority office to raise concern of wrongdoings in public procurement.

The study aimed to investigate if the respondents were familiar with the route they might use to report whistleblowing in public procurement.

The findings reveal that 50% of respondents are either unsure or unaware of the appropriate route to take when raising concerns about wrongdoings in public procurement. This suggests that half of the population lacks familiarity with the channels for reporting misconduct in public

procurement. This implies that, in certain instances, participants may have reported misconduct, but due to their lack of knowledge about the proper channels for reporting, they may not be able to obtain the necessary information to report the issue.

Figure 4.2: Awareness of routes of raising wrongdoings



### 4.3 Awareness of wrongdoings in Public Procurement

The findings reveal that 38.8% of the participants lack awareness about the specific matters that whistleblowing in public procurement should disclose. The research findings suggest that there is a lack of awareness among

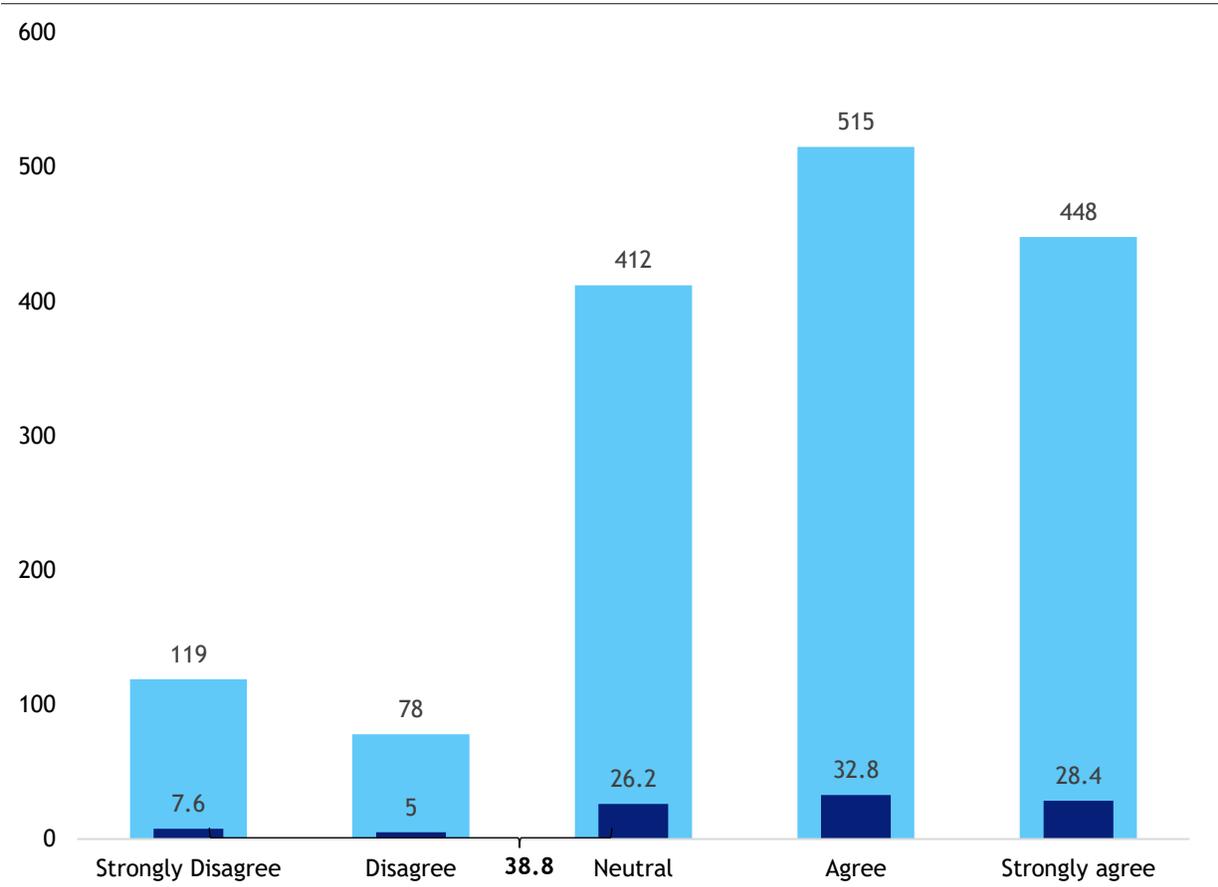
participants regarding the specific issues that whistleblowing in public procurement should address, indicating that a significant number of respondents may not be fully informed about what constitutes whistleblowing-worthy

concerns. This lack of awareness can lead to challenges in effectively identifying and reporting irregularities or fraudulent activities within public procurement processes. Enhancing awareness among stakeholders about the types of issues that warrant whistleblowing can be crucial in improving the detection and prevention of fraud in procurement activities. This indicates that individuals may occasionally come across situations that

necessitate reporting through whistleblowing.

However, due to a lack of awareness about the need for disclosure, some individuals may choose not to report these incidents, which could result in a significant loss of public funds. These findings were in line with Kostić & Bošković (2022) who revealed that there is a lack of awareness among the general public of their role in reporting wrongdoing in public procurement.

**Figure 4.3: Awareness of wrongdoings in public procurement**

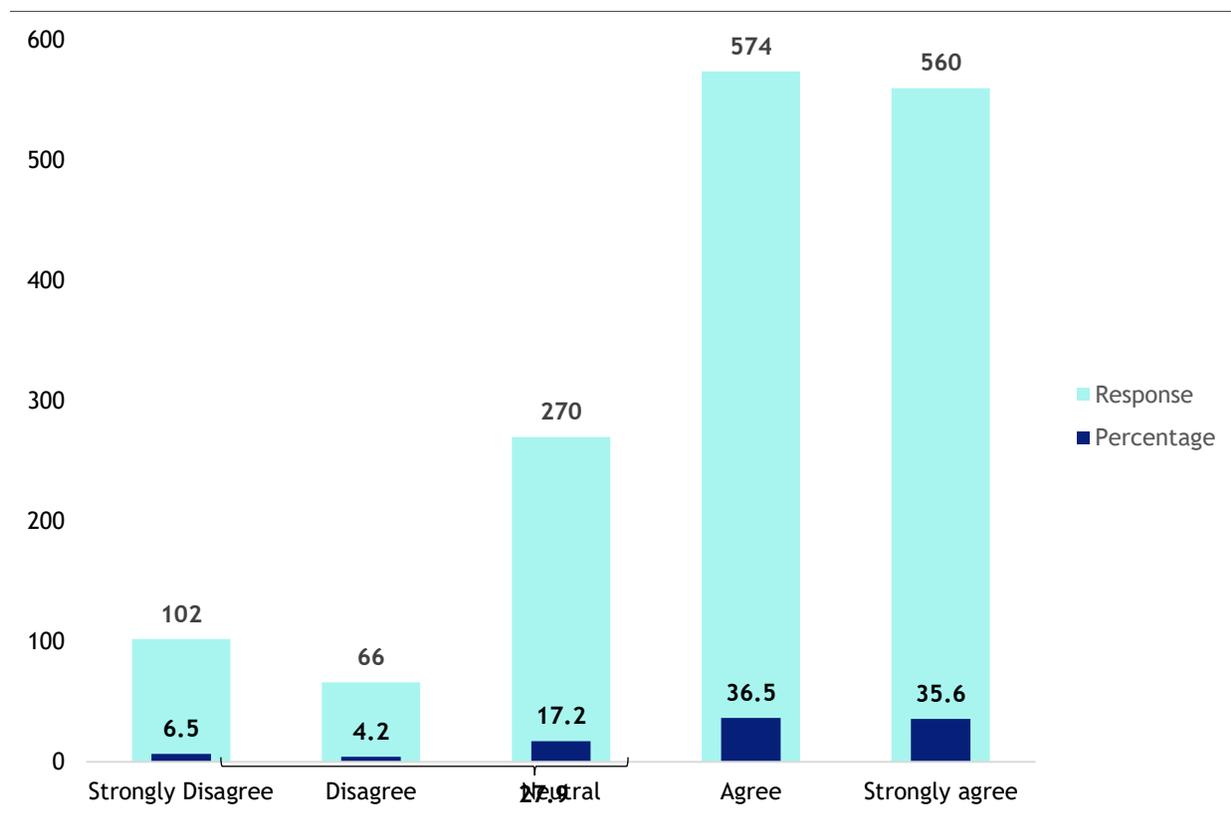


#### 4.4 Encouragement to report wrongdoings in public procurement as whistleblowers

The findings indicate that 27.9% of the 1,572 participants did not feel motivated to disclose instances of misconduct in public procurement through the whistleblowing process. This indicates that over a quarter of the respondents lacked the motivation to report any misconduct in public procurement through whistleblowing. As a result, the Authority is unable to obtain reliable information from a significant portion of the respondents, which ultimately hampers the ability to

gather vital information for preventing the misuse of public funds in public procurement. Although the study did not outline the reasons that influenced the whistleblower to report. However, Gottschalk and Smith (2016), on the other hand, argued that whistleblowing decisions on reporting issues are influenced by factors such as information, security, trust, job security predictability, self-confidence and organizational culture.

Figure 4.4: encouragement of reporting wrongdoings through whistleblowing

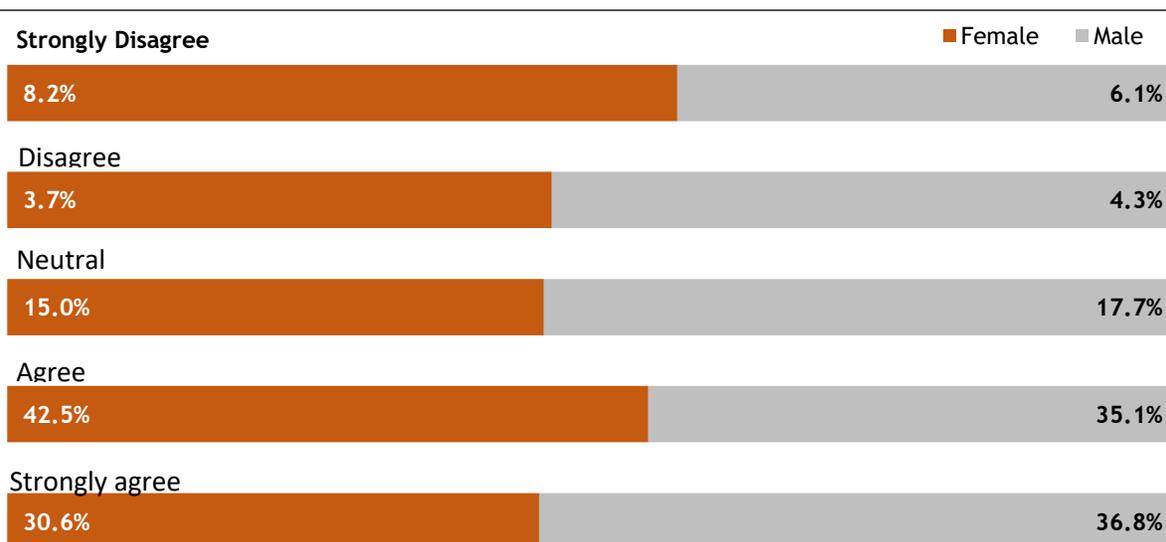


### 4.4.1 Men vs Women

The findings of the study indicate that there is a lower level of motivation among males (71.3%) compared to women (73.1%) when it comes to reporting misconduct in public procurement as whistleblowers. This implies that male participants exhibited a lower frequency of reporting misbehavior complaints in comparison to their female counterparts. Due to the high proportion of male employees in the organizations, it is likely that a substantial amount of important information regarding misconduct in public procurement was not reported.

This is because the individuals who obtained this information were male and were not encouraged to report these matters to the appropriate authority. This finding was in consistency with Handayani & Helmayunita (2019) who shows that there are no differences between man and women to report the fraud in procurement. However, the finding contradicts Sims and Keenan (1998) who revealed that men are more likely to participate in whistleblowing activities than their female counterparts.

**Figure 4.4.1: Men (71.9%) are less encouraged than women (73.1%) to report wrongdoings in public procurement as whistleblowers.**



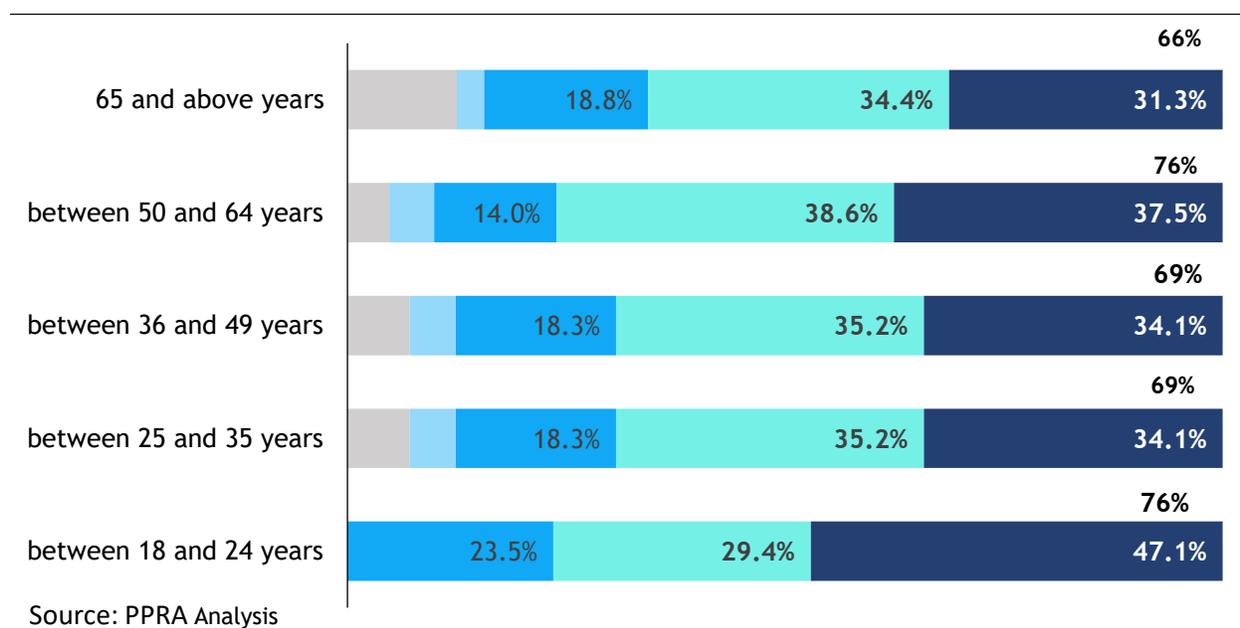
Source: PPRA analysis

#### 4.4.2 Age group encouragement for reporting wrongdoing in Public Procurement

The results indicate that those in the young generation (18-28) and prime age generation (50-64) are more encouraged than other groups to report wrongdoing in public procurement as whistleblowers. Despite these groups not comprising a significant proportion of the overall workforce in organizations, it is evident that the majority of respondents from other groups were not motivated to report

wrongdoing in public procurement through whistleblowing. As a result, a significant number of respondents were discouraged from reporting clearly, obstructing the Authority's ability to get critical information about misconduct in public procurement. This finding contradicts to Liyanarachchi & Adler (2011) who found that the age group of participants between 35 and 44 is more likely to whistle-blow.

Figure 4.4.2 Young generation (18-24 years) and prime age generation (50-64 years) are more encouraged than other age group to report wrongdoings in public procurement as whistleblowers.

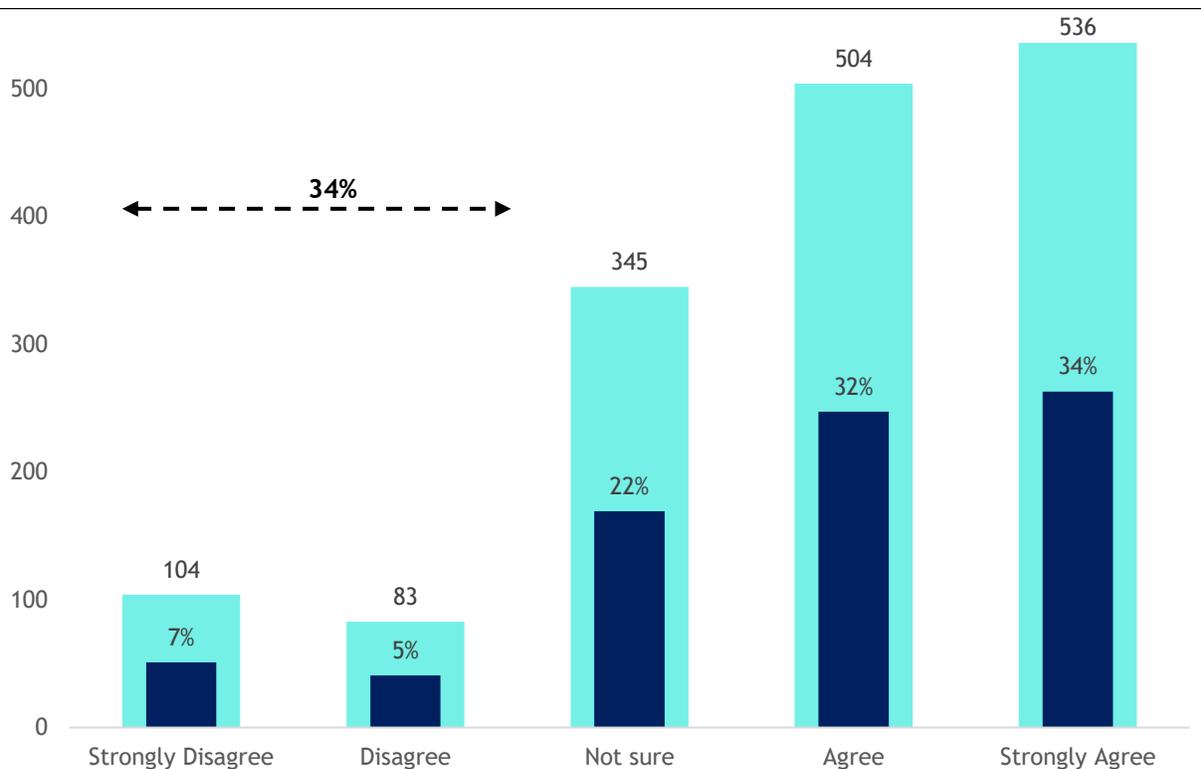


#### 4.5 Protection and safety of whistleblowers

The finding in Figure ...indicate that a significant 66% of feel that it is secure to disclose wrongdoing in public procurement. This result suggest that most of the participants believe that there is a favorable atmosphere for them to disclose any wrongdoing in the

public procurement procedure. Remarkably, the recorded occurrences are significantly fewer as compared to the instances of malpractices reported annually in public procurement operations, as documented in the CAG and PPRA reports.

Figure 4.5: Protection and safety of whistleblowers



#### 4.6 Safety and encouragement for reporting wrongdoings in public procurement

The findings indicate that 84% of respondents who feel safe to report wrongdoings in public procurement are strongly encouraged to report as whistleblowers. This suggests that the general public possesses a commendable

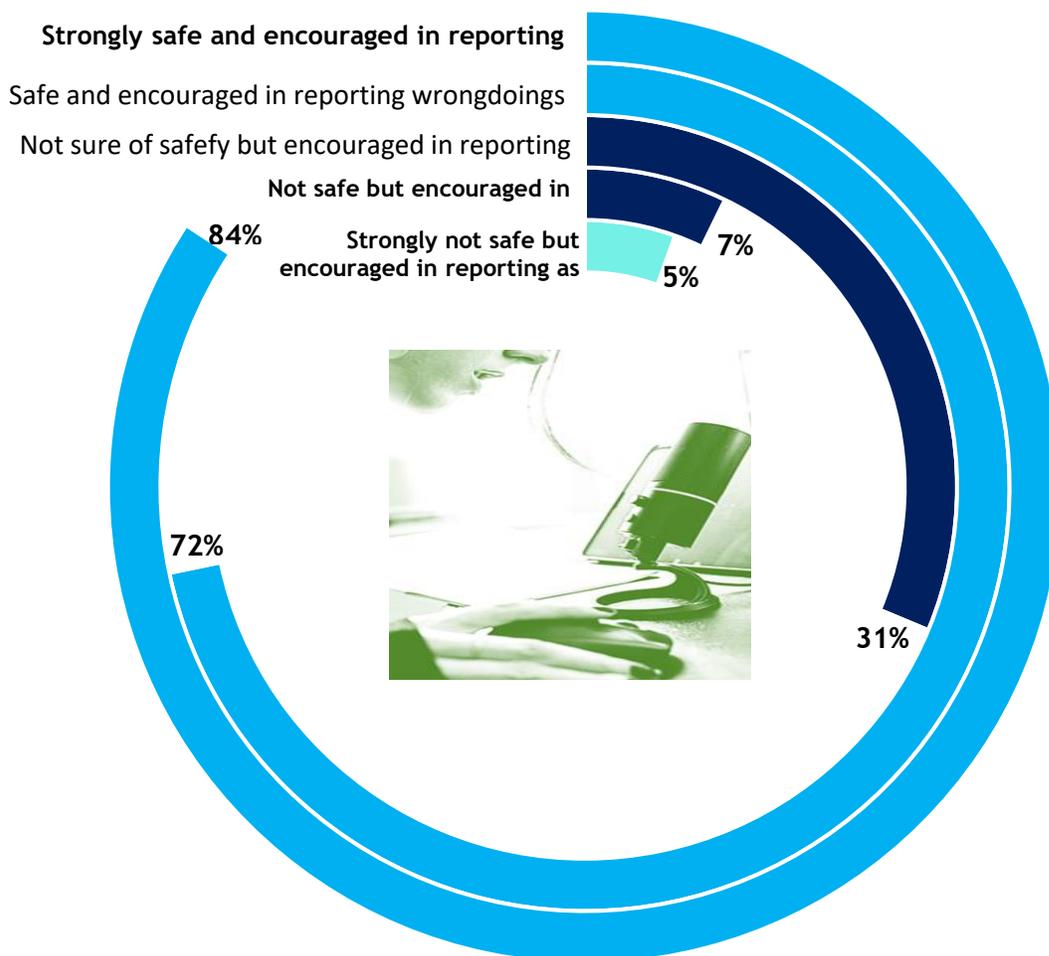
tendency to reveal instances of misconduct. This tendency demonstrates the potential for the Authority and other organizations to acquire a significant amount of information that may be used to

enhance procurement performance within the organization and prevent misconduct in public procurement.

The issue of whistleblower security is overemphasized by a number of scholars due to the risk of retaliation if not handled properly therefore, recipients are obligated to provide protection for the whistleblower (Gottschalk and

Smith, 2016). Additionally, the authors went further by saying that report recipients are responsible for ensuring that a whistleblower is not subject to adverse repercussions. As reported, whistleblowers in Uganda sometimes face retaliatory deaths, a situation that requires avoidance (Tumuramye et al.,2018).

**Figure 4.6 : Safe and encouragement to report wrongdoings in public procurement**



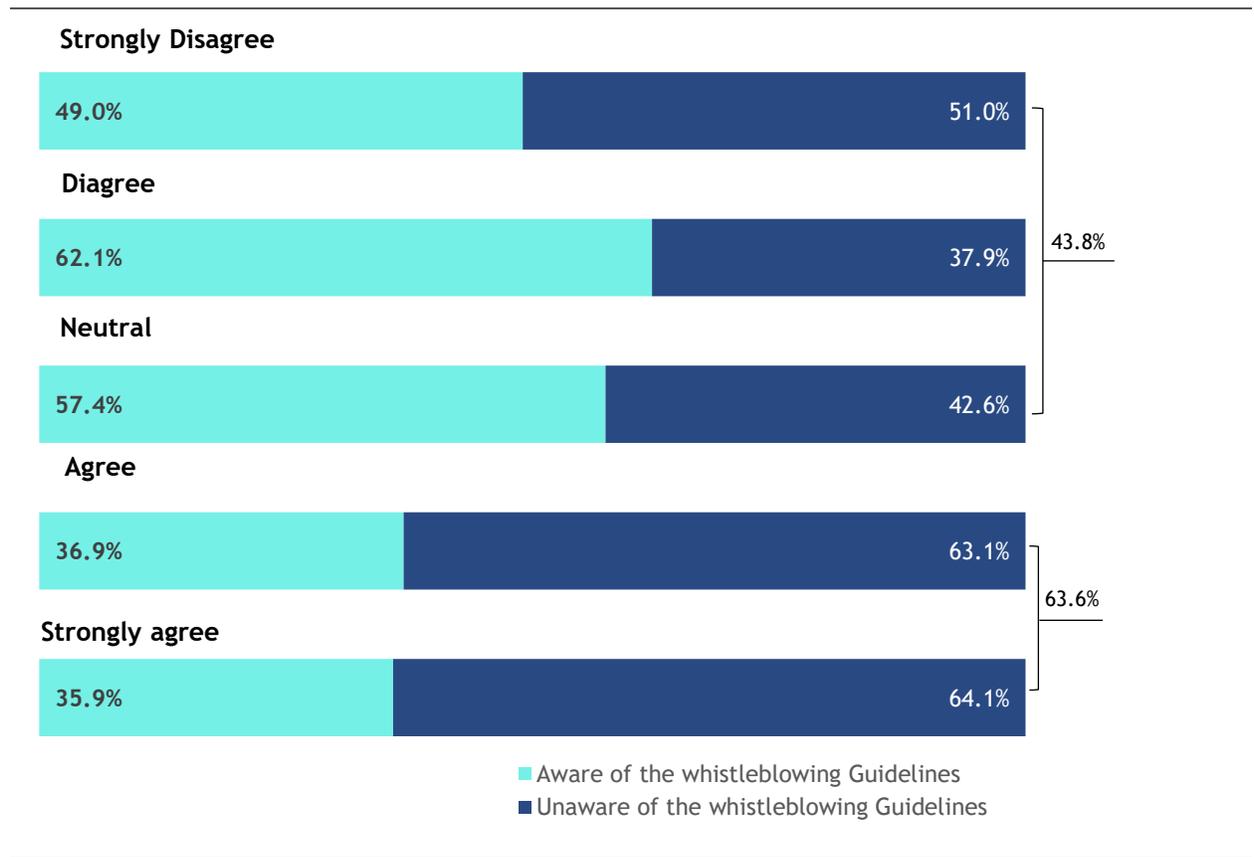
Source: PPRA Analysis

## 4.7 Encouragement and awareness of the whistleblowing guidelines

The findings reveal that 63.6% respondents who are encouraged to report wrongdoings in public procurement as whistleblowers are unaware of the PPRA whistleblowing Guidelines of 2021. This means that if a substantial number of respondents are aware of the presence of the guidelines, they may take the initiative to obtain

more in-depth knowledge about the guidelines, thereby increasing their participation in whistleblowing efforts. Previous studies have shown that the general public's awareness of the presence of the guideline is one crucial factor in motivating whistleblowing (Klaaren & Brunette, 2020; Kostić & Bošković, 2022).

Figure 4-7: Encouragement and awareness of the whistleblowing guidelines

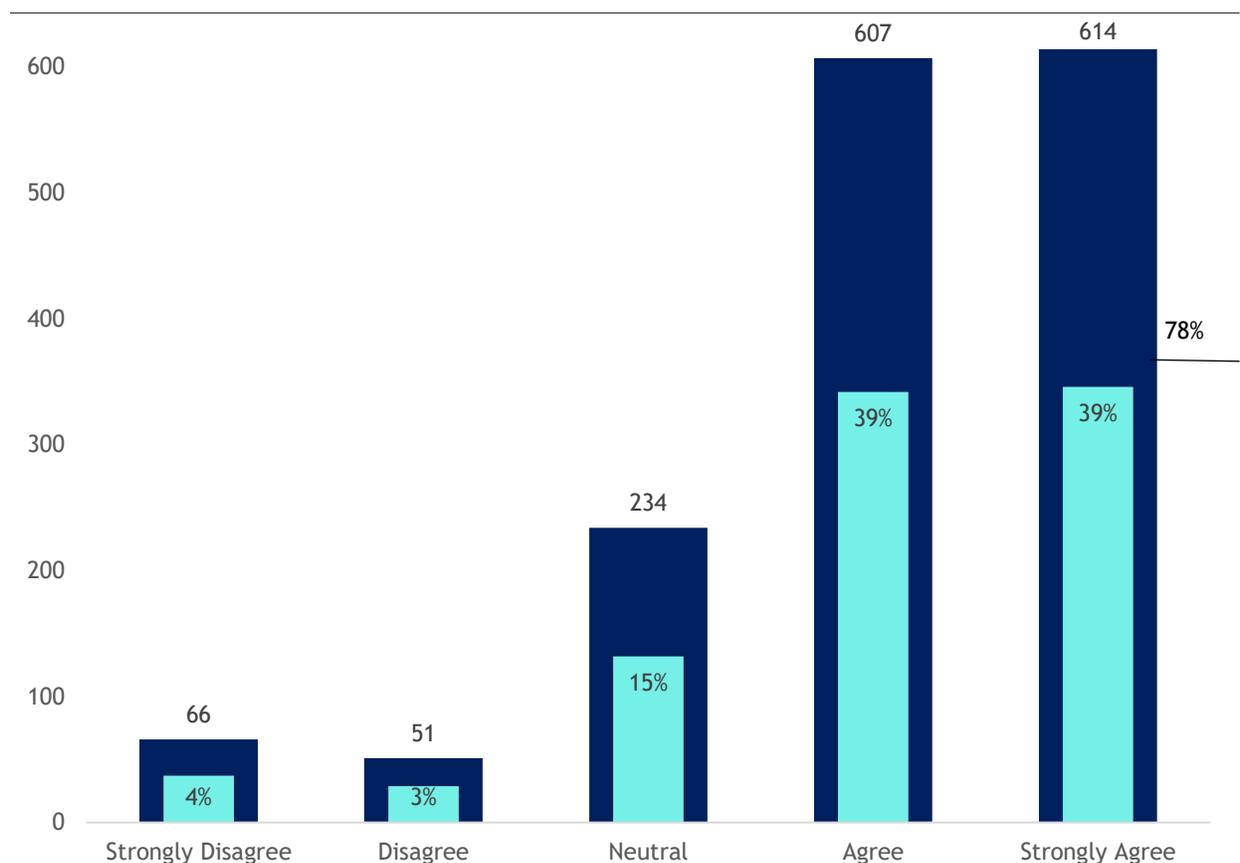


#### 4.8 Improvement of compliance performance level through whistleblowing

The results reveal that **78% of respondents agreed that whistleblowing in public procurement helps to improve compliance performance level.** This suggested that if the Authority and the organizations as a whole insisted on whistleblowing, the degree of compliance within the organization would increase since the weakness and deficiency would be identified at the right time and appropriate action would be taken to

correct what was wrong. Not only that, but unethical professionals may refrain from engaging in wrongdoing because they are confident that their actions would be uncovered, and the appropriate consequence will be imposed on them. This finding was support with Tumuramyé et al. (2018) who conducted a study in Uganda and argued that reporting misconduct in public procurement through whistleblowing improves compliance

Figure 4.8: Compliance performance level and whistleblowing in public procurement

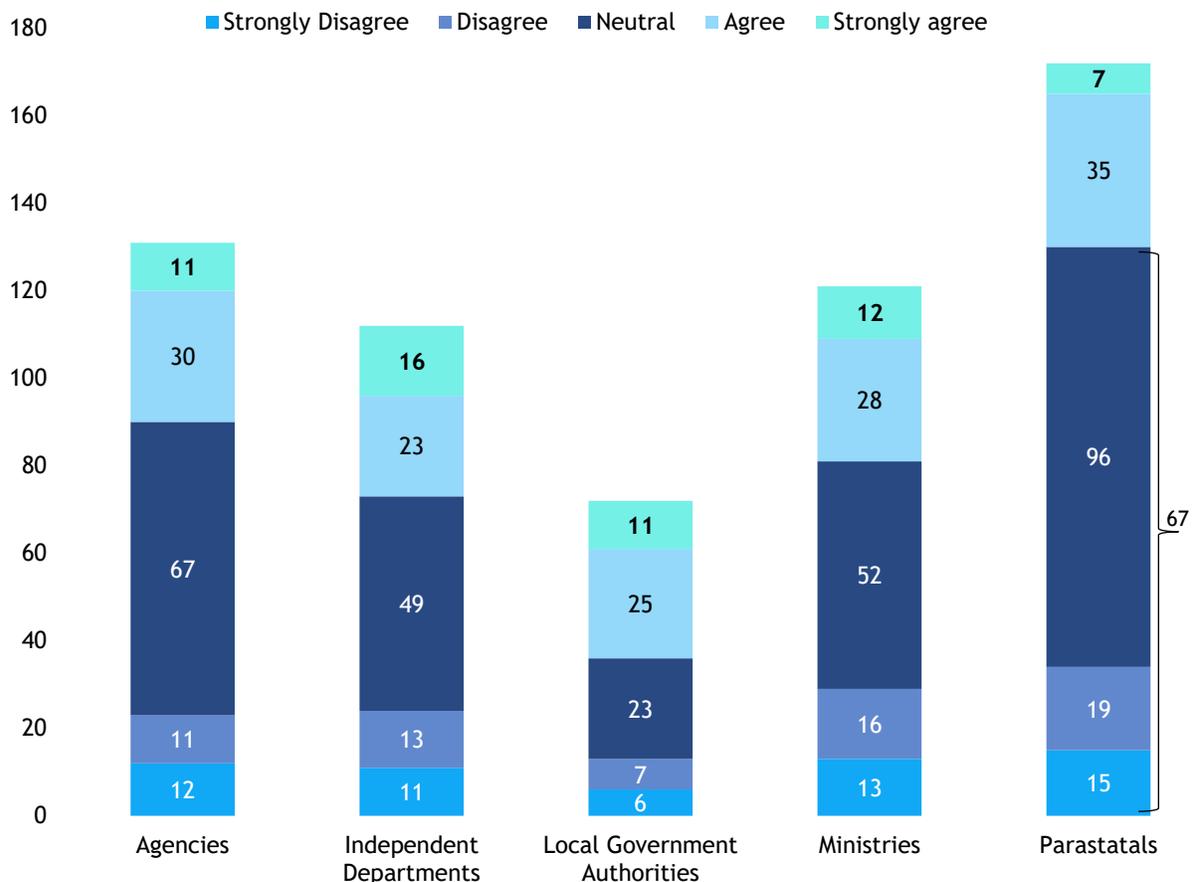


#### 4.9 Feedback on the raised concerns of wrongdoings in public procurement

The findings indicate that failure to give regular feedback on the raised concerns was backed up by 67.4% of the responses received from 608 participants across procuring entities. This suggests that the whistleblowers did not receive information on the final outcomes of their reports from the relevant authorities. This will undoubtedly impact the effectiveness of

whistleblowing initiatives as it is believed that if the whistle blowers were informant on their efforts will motivate them to participate in more whistleblowing activities. This finding is in line with Kumar & Santoro (2017) who assert that the provision of feedback encourages whistleblowing mechanisms in public procurement

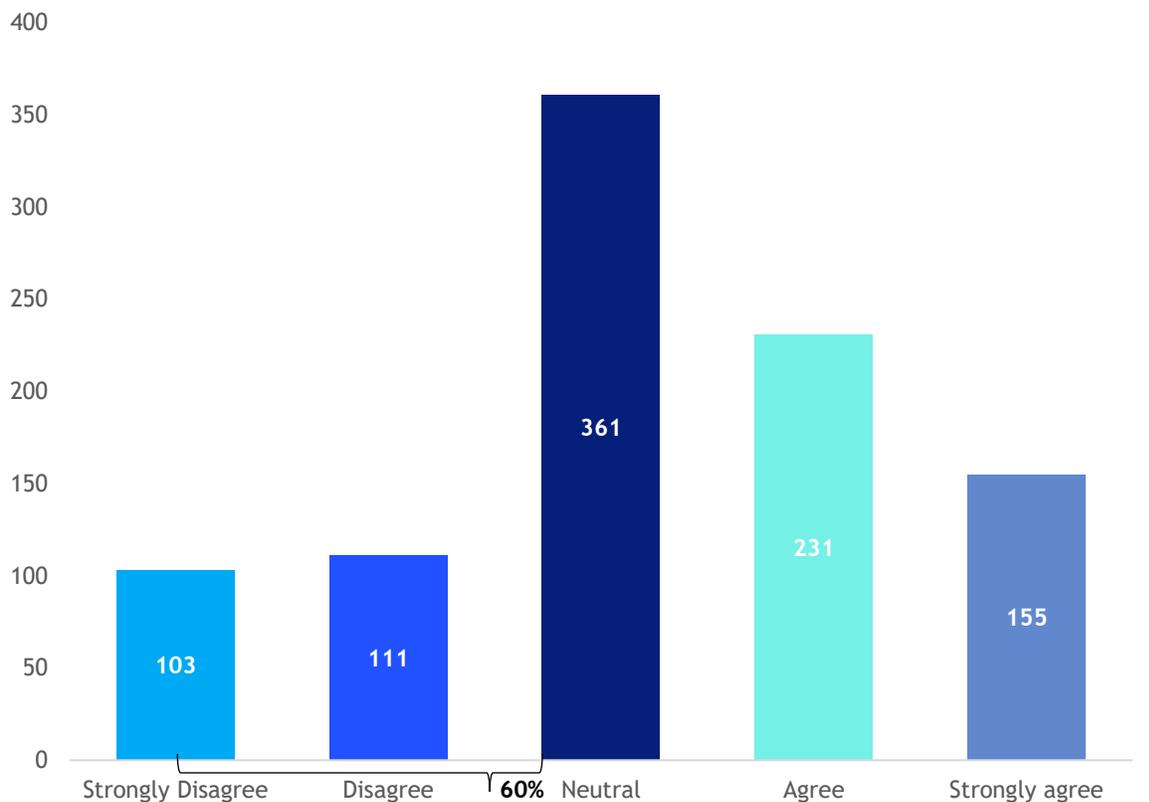
**Figure 4.9: Feedback on the raised concerns of wrongdoings in public procurement (procuring entities opinion)**



Moreover, the study was interested to assess the opinion on side of the economic operators on effect of provision of regular feedback. The results indicate that **failure to give regular feedback on the raised concerns was backed up by 59.9% of the responses received from 960 participants from economic operators.**

This indicates that the whistleblowers were unable to ascertain whether the reported information had been implemented or not. Therefore, this will undoubtedly impact the whistleblowers' ability to report the issues as required.

**Figure 4.10: Feedback on the raised concerns of wrongdoings in public procurement (economic operators opinion)**



## 5 Recommendations

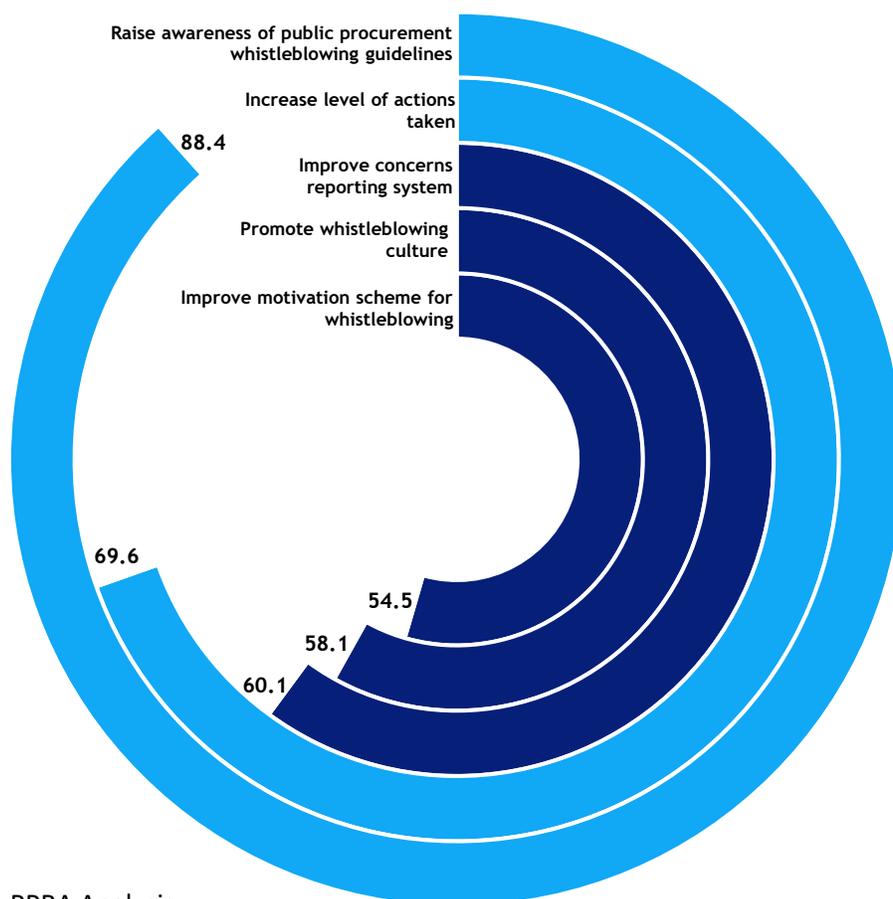
This section offers valuable recommendations for enhancing whistleblowing in public procurement. The initial set of recommendations comprises ideas put forward by the survey participants. Additionally, the second set of recommendations is crafted based on the thorough analysis conducted by the researchers of this study.

### 5.1 Respondents' recommendations

The recommendations stem from a survey question that sought respondents' opinions on how to enhance reporting of misconduct in public procurement through whistleblowing. These measures can be utilized by PPRA and

competent authorities to boost whistleblowing initiatives in public procurement. Figure 5.1 demonstrates the percentage rate of each action to be employed by PPRA to improve whistleblowing in public procurement.

Figure 5.1: Respondents' Recommendations-



Source: PPRA Analysis

### **5.1.1 Raise awareness of public procurement whistleblowing guidelines**

The results indicated that a significant proportion of participants (88.4%) expressed the necessity of increasing public awareness regarding the importance of reporting misconduct through whistleblowers. The Public Procurement Regulatory Authority's whistleblowing guidelines, which the respondents were unaware of, sparked their concern. It is believed that increasing awareness of the guidelines among participants and the general public will enhance whistleblower reporting of wrongdoing. In addition, the respondents suggested some strategies that the PPRA may employ to increase awareness of whistleblowing in public procurement. The participants express an urgent need for a whistleblowing guideline to be in Swahili, given that most Tanzanians are familiar with it. Additionally, the respondents suggested conducting training programs and implementing special radio and TV programs to educate the public on the matter. By utilizing a slogan and creating posters, we may organize visits to the community in order to educate

them about the significance of reporting misconduct in public procurement.

### **5.1.2 Increase level of actions taken**

Moreover, the results indicate that a significant majority of the participants (69.6%) concurred that there is a need to increase the level of action taken for individuals implicated in misconduct. The prevailing practice of allowing wrongdoers to go unpunished serves as a deterrent to whistleblowers, discouraging them from revealing their findings. The respondents proposed additional actions that the authority could take against the wrongdoers, such as confiscation, imprisonment, demotion, transfer, and similar measures. Furthermore, it is crucial to adequately inform the general public about the actions taken against wrongdoers.

### **5.1.3 Improve concerns reporting system**

The majority of respondents (60.1%) have proposed having an improved system that involves implementing an appropriate, easy, affordable, and free reporting mechanism. The respondents suggested various reporting systems, such as implementing a hotline, toll-

free numbers, and utilizing social media platforms like WhatsApp, Twitter, Facebook, Instagram, TikTok, and similar platforms. In addition, there has been an emphasis on utilizing easily memorable telephone numbers, such as 111. This strategy aims to motivate the general public to report misconduct in public procurement. Other participants recommended implementing a dedicated platform on both the PPRA website and NeST

#### 5.1.4 Promote whistleblowing culture

The respondents (58.1%) also suggested fostering a whistleblowing culture within society as a strategy to enhance whistle-blowing activities. The respondents have suggested that the Authority implement various initiatives, such as conducting mass campaigns, utilizing community radios, visiting

schools, and engaging with the *Vijiwe vya Bodaboda*, in order to raise awareness among the general public about their roles and importance in participating in whistleblowing activities.

#### 5.1.5 Improve motivation scheme for whistleblowing

Lastly, the participants (54.5%) recommended that the Authority to improve the motivation scheme for whistleblowing. Respondents suggested some strategies that the Authority may utilize in order to incentivize whistleblowers to report instances of misconduct in public procurement. These include providing rewards, special recognition, funding, and similar incentives.

## 5.2 Designated Recommendations

This section introduces a prioritized matrix of recommendations, meticulously crafted through insightful analysis of the open-ended questions and panel discussions. By organizing the recommendations into a matrix, a clear roadmap is established for PPRA and

other relevant authorities to seamlessly execute these suggestions aimed at enhancing whistleblowing in public procurement. Figure 5.2 provide further details of the matrix.

Figure 5.2 indicates that, most respondents agreed that there is a need

to put more effort into raising awareness regarding whistleblower guidelines and policies (see top-right of the figure, high-high). The general public should be aware that there are special guidelines for whistleblowing in public procurement. The guideline should also be in Swahili so that a large population of the community can read, understand, and take responsibility for reporting misconduct in public procurement.

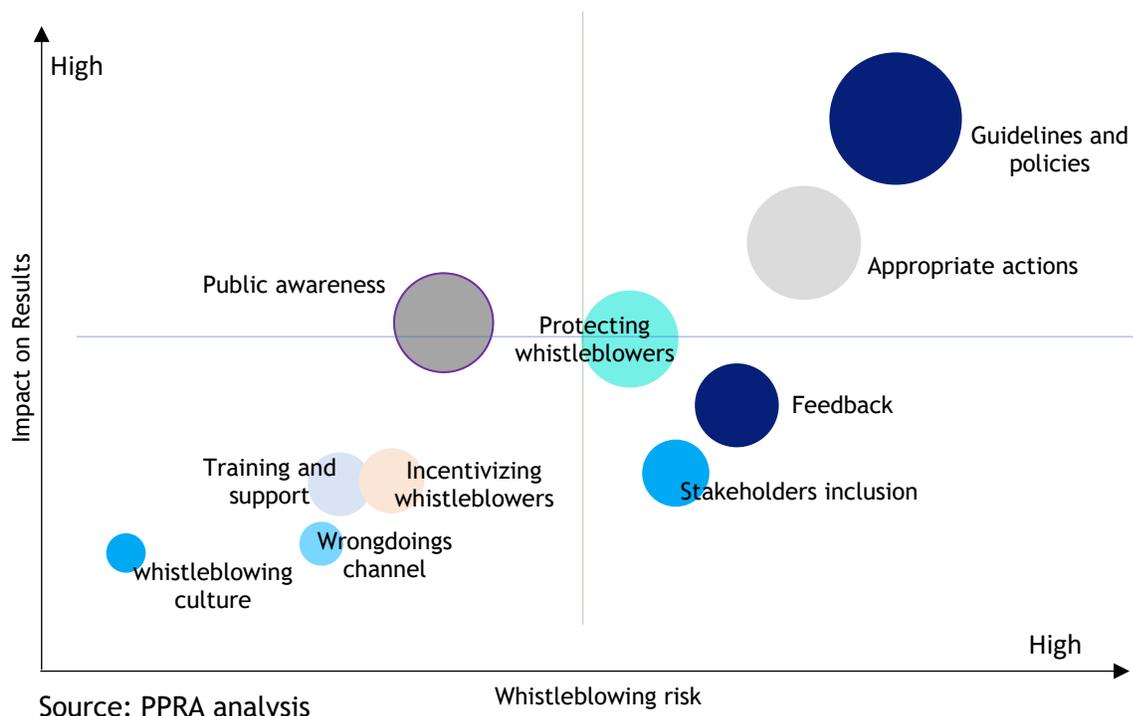
Additionally, the respondents expressed concern about the need to take appropriate action against those involved in misconduct in public procurement. The participants stressed the importance of imposing appropriate actions on those involved in misconduct. Furthermore, it is crucial to make the public aware of these actions to encourage them to engage in whistleblowing activities in the future.

Another concern that has been overemphasized in reporting public procurement wrongdoing through whistleblowing is whistleblower

security. There is a need to safeguard whistleblowers' safety while disclosing corruption in public procurement. This may include maintaining the whistleblower's secrecy, and officers tasked with dealing with whistleblower concerns, such as receiving misbehavior charges, should not disclose whistleblower material to any unauthorized individual. Implementing these precautions will eliminate the possibility of retaliation and revenge.

Furthermore, there is an overemphasis on promoting public awareness of whistleblowing in public procurement. The survey found that a considerable proportion of the general public is unfamiliar with whistleblowing in public procurement. As a result, the authorities should provide training to the general public through various media, such as community radio, social networks, and television, as well as paying visits to special groups such as students in schools and universities, thereby informing a significant segment of the community.

**Figure 5.2: Priority Matrix for recommendations- Guidelines, policies, and failure to take action are priorities for effectiveness of whistleblowing in public procurement.**



The participants emphasize the importance of offering incentive packages to whistleblowers, acknowledging their contributions to national development, as a means to enhance whistleblowing in public procurement. It is believed that the general public will become highly motivated if they understand the results of the reports they've made to the authorities. The incentive packages can be in the form of cash, rewards, or other forms of recognition.

The participants suggested that there is a need to have an appropriate channel

for reporting misconduct in public procurement. These channels should be easily accessible, cheap, and straightforward. Not only that, but the channel should be able to hide the identity of the whistleblower for security purposes.

A further strategy for encouraging whistleblowers to disclose misconduct in public procurement is to involve stakeholders in the process. Those stakeholders involved in public procurement should seize the opportunity to promote it. For example, government ministries, parastatal organizations, independent

departments, and economic operators should all be able to help whistleblowers within their particular organizations.

## 6 Conclusion

The study aimed to investigate the factors that hinder effective whistleblowing reporting of misconduct in public procurement. The study revealed several factors contributing to the absence of effective whistleblowing. These include a lack of awareness regarding whistleblowing guidelines and activities, a lack of interest among individuals, a failure to take action against wrongdoing, concerns about the safety of whistleblowers, and inadequate provision of feedback to those who blow the whistle. The study suggested that the Authority should enhance public awareness regarding the significance of whistleblowing. The study also recommended that the Authority should encourage whistleblowing activities, ensure the safety of whistleblowers, provide timely feedback on reported information, and take appropriate action against wrongdoers. Furthermore, it emphasized the importance of making these actions publicly known.

## 7 References

- Atwater, K. (2006, October 23). Whistle blowers enforce procurement ethics. American City & County. <http://americacityandcounty.com/mag/whistle-blowers-enforce-procurement-ethics>
- Bagustianto, R. (2014). Faktor-Faktor Yang Mempengaruhi Minat Pegawai Negeri Sipil (Pns) Untuk Melakukan Tindakan Whistle-Blowing (Studi Pada PNS BPK RI). *Jurnal Ilmiah Mahasiswa FEB*, 3(1).
- Banisar, D. (2011) 'Whistleblowing: International Standards and Developments', ... *the Frontiers Between State, Market and ...*, (February 2011), pp. 1-115. Available at: [http://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=1753180](http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1753180).
- Basheka, B.C. (2021) 'Public procurement governance: Toward an anti-corruption framework for public procurement in Uganda', *Public Procurement, Corruption and the Crisis of Governance in Africa*, pp. 113-141. Available at: [https://doi.org/10.1007/978-3-030-63857-3\\_7](https://doi.org/10.1007/978-3-030-63857-3_7).
- Boydell, C.A. (2018) 'Best in Practices Whistleblower Legislation', (November).
- Ceva, E. and Bocchiola, M. (2020) 'Theories of whistleblowing', *Philosophy Compass*, 15(1), pp. 1-10. Available at: <https://doi.org/10.1111/phc3.12642>.
- Chalouat, I., Carrión-Crespo, C. and Licata, M. (2019) *Law and practice on protecting whistleblowers in the public and financial services sectors*. Available at: [www.ilo.org/publns](http://www.ilo.org/publns).
- Fapohunda, Tinuke. (2016). Gender: Precursor of Whistle Blowing Intentions and Reprisals. *International Journal of Research in Humanities and Social Studies*. Volume 3, Issue 12, December 2016, PP 19-27
- Gottschalk, P. and Smith, C. (2016) 'Detection of white-collar corruption in public procurement in Norway: The role of whistleblowers', *International Journal of Procurement Management*, 9(4), pp. 427-443. Available at: <https://doi.org/10.1504/IJPM.2016.077703>.
- Handayani, D.F. and Helmayunita, N. (2019) 'Women and Whistle-Blowing: Gender in Reporting Channel and Moral Reasoning to Report the Fraud in Procurement Processes in The Government Sector', *92(Icame 2018)*, pp. 391-400. Available at: <https://doi.org/10.2991/icame-18.2019.43>.
- Klaaren, J., & Brunette, R. (2020). The Public Procurement Bill Needs Better Enforcement: A Suggested Provision to Empower and Incentivise Whistle-Blowers. *African Public Procurement Law Journal*, 7(1), 16-25.
- Kostić, J. and Bošković, M.M. (2022) 'Recommendations for Overcoming Challenges of Whistleblowing in Public Procurement Procedures', *Law: Journal of the University of Latvia*, 2022(15), pp. 57-69. Available at: <https://doi.org/10.22364/jull.15.05>.
- Kumar, M. and Santoro, D. (2017) 'A justification of whistleblowing', *Philosophy and Social Criticism*, 43(7), pp. 669-684. Available at: <https://doi.org/10.1177/0191453717708469>.
- Livingston, E. H., & Wislar, J. S. (2012). Minimum response rates for survey research. *Archives of Surgery*,. *Archives of Surgery*, 147(2), 110-110. <https://doi.org/10.1001/archsurg.2011.2169>

Liyanarachchi, G.A. and Adler, R. (2011) 'Accountants' Whistle-Blowing Intentions: The Impact of Retaliation, Age, and Gender', *Australian Accounting Review*, 21(2), pp. 167-182. Available at: <https://doi.org/10.1111/j.1835-2561.2011.00134.x>.

Mchopa, A.D. *et al.* (2024) 'Public procurement trajectories in Tanzania: a review of reforms, practices, and compliance', *Cogent Business and Management*, 11(1), p. Available at: <https://doi.org/10.1080/23311975.2023.2300498>.

OECD (2017) *Government at Glance 2017*, OECD Publishing. Available at: [https://www.oecd-ilibrary.org/government-at-a-glance-2017-summary-english\\_6f306823-en.pdf?itemId=%2Fcontent%2Fcomponent%2F6f306823-en&imeType=pdf](https://www.oecd-ilibrary.org/government-at-a-glance-2017-summary-english_6f306823-en.pdf?itemId=%2Fcontent%2Fcomponent%2F6f306823-en&imeType=pdf).

Omojuyigbe, P.N (2009) Gender Relations and Discrimination in Nigeria Police Force, Lagos, Centre for Law Enforcement Education.

Periansya, P. *et al.* (2023) 'Whistleblowing, fraud prevention, and fraud awareness: Evidence from the Palembang Local Government of Indonesia', *Problems and Perspectives in Management*, 21(2), pp. 556-566. Available at: [https://doi.org/10.21511/ppm.21\(2\).2023.51](https://doi.org/10.21511/ppm.21(2).2023.51).

Richardson, W.E (2014) Sense and nonsense about culture and climate. In N.M. Ashkanasy, C. P. M.

Richardson, B.K. and Garner, J. (2022) 'Stakeholders' Attributions of Whistleblowers: The Effects of Complicity and Motives on Perceptions of Likeability, Credibility, and Legitimacy', *International Journal of Business Communication*, 59(3), pp. 334-354. Available at: <https://doi.org/10.1177/2329488419863096>.

Sama, H.K. (2014) 'Breaking the Silence: Efficacy of Whistle Blowing in Public Procurement', *Scientific Research Jurnal*, 3(4), pp. 978-979.

Sims, R. L., & Keenan, J. P. (1998). Predictors of external whistleblowing: Organizational and intrapersonal variables. *Journal of business ethics*, 17(4), 411-421.

Sloan, M.K. (2011) Whistleblowers: Truth, justice, and the American way. *Journal of Applied Management and Entrepreneurship* 9(4), 120-132.

Stieger, C.J. (2012) 'Offering Monetary Rewards to Public Whistleblowers: A Proposal for Attacking Corruption at Its Source', *Ohio State Journal of Criminal Law*, Vol. 9, No. 2, pp. 815-829.

URT (2022) Whistleblower and Witness Protection Act available:<https://tanzlii.org> > akn > act > source

URT (2021). Public Procurement Whistleblowing Guideline (1st edition).

URT (2024). Controller and auditor general audit report 2022/2023, National Audit

Office: Dar es Salaam, Tanzania.

URT (2011). Procurement Act No. 7. Government Printer. Dar es Salaam

Region, Tanzania.

URT (2013). Public Procurement Regulations GN No. 97, Dar es Salaam Region:

Government Printer.

URT (2023). Public Procurement Regulatory Authority annual performance evaluation

report for 2021/2022 financial year

Tumuramy, B., Ntayi, J.M. and Muhwezi, M. (2018) 'Whistle-blowing intentions and behaviour in Ugandan public procurement', *Journal of Public Procurement*, 18(2), pp. 111-130. Available at: <https://doi.org/10.1108/JOPP-06-2018-008>.

Valentin Fischer, M. (2023) 'Personality and Whistleblowing Theory, Methodology, and Some Empirical Evidence'.

World Bank. (2018). *Benchmarking public procurement: Assessing public procurement regulatory systems in 180 economies*. International Bank for Reconstruction and Development/The World Bank.