

# The right to speak up and the channels for doing so

## A comparative study of Denmark, England, Ireland and Norway

In 2021, the Research Council of Norway funded the project entitled “Workers’ voice and the right to manage – the case of whistleblowing in a comparative context”. In this brief, we present the main findings from our empirical research on freedom of speech for workers in four countries; Denmark, England, Ireland and Norway.<sup>1</sup>

### Freedom of speech in principle

The context of our research on the scope for speaking up publicly is that freedom of expression is a constitutional right in Ireland and both Scandinavian countries but not in England. In Norway, it is established that workers basically have the same freedom of expression as others, and that it is the limitations on workers’ right to express themselves that must be justified, not the right itself.

Furthermore, freedom of expression is a human right under Article 19 of the Universal Declaration of Human Rights, which provides that:

“Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.”

Article 10 of the European Convention on Human Rights (ECHR) reflects this but adds the following caveats:

“The exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society, in the inter-

ests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals, for the protection of the reputation or the rights of others, for preventing the disclosure of information received in confidence, or for maintaining the authority and impartiality of the judiciary.”

We study how workers assess various aspects of their freedom of expression. In this brief, we focus on the scope to speak up publicly.

### How wide or narrow is the scope?

To speak up publicly may be regarded as a form of voice that can be used to benefit an organisation, as well as a means through which workers challenge managerial behaviour or decisions (Wilkinson et al. 2018). How wide or narrow the scope should be and how wide it is can therefore vary according to the issue in question and who is asked. In the survey, respondents were first asked how wide or narrow the scope *should* be in relation to four issues: (i) working conditions, (ii) professional issues, (iii) economic priorities and (iv) restructuring. It was emphasised that we were asking here about statements that do not breach statutory confidentiality.

In Table 1, we present the percentage of respondents who indicated that the scope to speak publicly should be quite or very large, and compare the answers of workers and managers with personnel responsibility.

Our data indicates that managers in Ireland and England have a similar view of the scope to speak publicly about the four themes. Furthermore, only minor differences can be observed when we compare managers’ and workers’ responses.

<sup>1</sup> Brief 1 provides information about the survey data.

**Table 1: How narrow or wide should the scope to speak up publicly be? Those who answered quite wide and very wide. Responses in percentages.**

	Denmark (N = 1771)		Norway (N = 3320)		England (N = 2319)		Ireland (N = 973)	
	Managers	Workers	Managers	Workers	Managers	Workers	Managers	Workers
Working conditions	38	35	39	51	47	46	46	49
Professional issues	48	54	60	60	46	41	45	46
Economic priorities	22	36	27	35	42	37	46	44
Restructuring	32	35	40	45	42	35	41	39

However, there is somewhat greater variation in England, particularly when it comes to how much room for expression a worker should have on issues related to restructuring. Somewhat surprisingly, workers seem to have a more restrictive view on this issue than the managers.

Turning to the Scandinavian countries, there is more variation both between themes and between managers and workers. In both countries, it is believed that the scope should be widest for professional issues, but there is significant difference between the countries. In terms of working conditions, these are viewed quite similarly among managers and workers in Denmark. In Norway, workers believe that the scope to speak publicly should be significantly wider than that indicated by managers. Furthermore, we find that statements concerning economic priorities are given less prominence and that managers and workers differ in their views about the scope to speak publicly about such priorities. In Denmark, there is a difference of 14 percentage points between managers' and workers'

responses, and 8 percentage points in Norway.

As we can see in Table 2 below, when asked how narrow or wide the scope to speak up publicly actually is, the picture changes. Managers will have stricter requirements for loyalty compared to workers, owing to the probability that managers will be identified with the enterprise or organisation when they speak in public. This is why we only present the workers' responses.

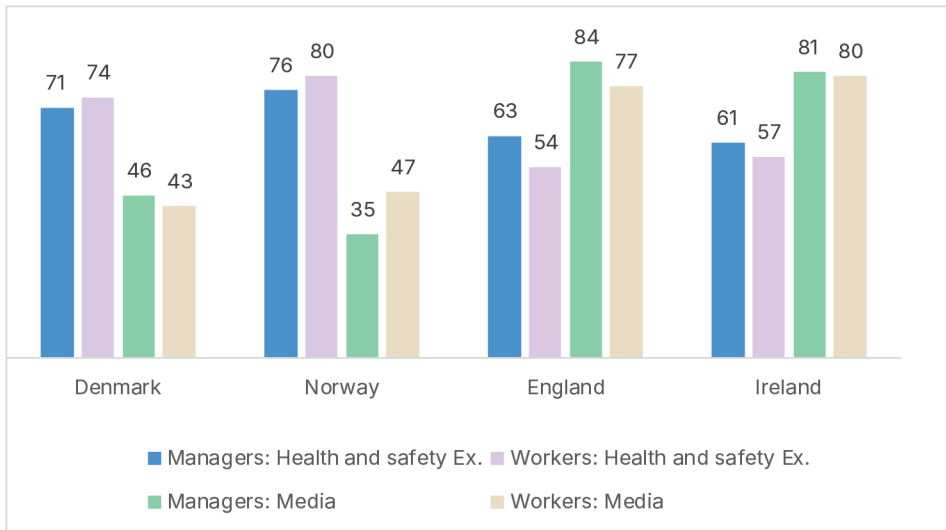
While the Irish and English respondents feel that they have most scope to speak publicly about working conditions (39% and 29%), the Norwegians and the Danes seem to feel that they have most scope to speak publicly about professional issues (44% and 43%).

The results for economic priorities and restructuring are much more similar across countries. The workers in Ireland (28%) consider their scope to speak up publicly to be wider than the others when it comes to economic priorities, while the respon-

**Table 2: How narrow or wide workers consider that the scope to speak up publicly is. Those who answer quite wide and very wide. Responses in percentages.**

	Denmark (N = 1442)	Norway (N = 2831)	England (N = 1937)	Ireland (N = 600)
Working conditions	34	32	29	39
Professional issues	43	44	26	31
Economic priorities	20	21	22	28
Restructuring	26	26	21	28

Figure 1. Raising concerns about heavy work pressures and dangerous situations. Responses in percentages.



dents from England (21%) consider their scope to speak publicly about restructuring to be narrower than the workers in the other countries.

There are noticeable differences when we compare how narrow or wide the scope to speak publicly should be (Table 1) with how the respondents consider it to actually be (Table 2). This is especially the case in Norway in relation to working conditions (51% versus 32%) and professional issues (60% versus 44%).

In your workplace, there has been a shortage of labour for a long period of time. This has led to heavy work pressure and dangerous situations for the workers. The problem has been raised several times in management meetings, but with no results.

1. One day, one of the employees sends an email to the Health and Safety Executive and reports the matter. Do you find this action acceptable?
2. One day, one of the employees sends an email to the media and reports the matter. Do you find this action acceptable?

**Channels for voicing concerns**

Does it matter to whom workers voice their concerns externally (outside the workplace)? Respondents were asked to consider the following vignette:

To study whether it matters which channels are used to voice concerns, we manipulated the channel. Half of the sample, randomly chosen, were asked if it is acceptable to voice concerns in the media. The other random sample were asked if it is acceptable to voice concerns to the Health and Safety Executive (or equivalent national agency, e.g. labour inspectorate). Figure 1 shows the proportion who find it acceptable to use the two external channels to voice concerns. Again, we compare managers' and workers' responses.

The majority of managers and workers find it acceptable to approach the Health and Safety Executive (or equivalent national agency) in Norway, Denmark and Ireland, and there are only small differences between managers' and workers' responses (71% vs. 74% in Denmark, 76% vs. 80% in Norway and 61% vs. 57% in Ireland). In England, the difference between the two groups is bigger (9 percentage points). Conversely, approaching the

media seems to be more acceptable in England and Ireland compared to Norway and Denmark.

Perhaps the obvious point to make here is that the media is unlikely to be in a position to take remedial action, although disclosures to the media can result in pressure being placed on employers/regulators to take remedial action. The Scandinavian responses may to some extent reflect the individual's attitudes concerning speaking publicly about issues that would be a matter for shop stewards and/or safety representatives. This in turn may be a reflection of the view that disclosing concerns to the media is seen as particularly disloyal to the company, safety representatives and union representatives. We asked the workers to consider the following statement: "My loyalty to the company/organisation outweighs my need to speak publicly about conditions in my workplace." 55% and 51% respectively of Norwegian and Danish respondents agreed, compared to just 38% and 32% of Irish and English respondents, respectively. This may be related to different perspectives on loyalty and common purpose held in pluralist and unitary systems of industrial relations.

### Do you want to read more?

In this brief we have presented our findings on how a sample of workers in Denmark, England, Ireland and Norway assess various aspects of freedom of expression at work. If you want to read more about the research, you will find information here:

[Workers' voice and the right to manage – the case of whistleblowing in a comparative context](#)

#### More in this series

This brief is part of a series of three:

1. [The right to speak up and the channels for doing so – methodology](#)
2. [The right to speak up and the channels for doing so](#)
3. [Empirical research on the whistleblowing process in Denmark, England, Ireland and Norway.](#)

In this Fafo brief we present some key findings on freedom of speech at work. You will find more information about, and publications from, the project "[Workers' voice and the right to manage – the case of whistleblowing in a comparative context](#)".

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