

Free speech in the workplace: findings and analysis of a qualitative research study

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Abstract

Freedom of speech is an important right in liberal democratic societies. It is also a concept that can generate significant academic and public debate. However, discussions of free speech are generally limited to analysis of people's rights and capacities to speak on political issues. Very little work has been done in other arenas such as the workplace where many people spend a large part of their time.

This paper reports on a research project that examines the status of free speech at work through a qualitative study of employees in Australian organisations. The project sought to provide insights into what managers and non-managerial employees in Australian organisations take a right to freedom of speech to mean within workplace settings; their experiences and understandings of their capacity to speak freely in the workplace; and how they make sense of or explain any difference between their rights and capacities at work. This paper provides a description and philosophical analysis of some of the qualitative findings.

Introduction

Free speech, defined as our right to 'express an opinion of any kind without incurring a penalty' (*Shorter Oxford English dictionary*, 5th ed, 2002), is an important right in liberal democratic societies. It is also a concept that can cause significant debate.¹ However, academic discussions of free speech are generally limited to political issues such as government policy. Very little work has been done in another important arena: the workplace.²

As a way of addressing the gap this paper reports on a research project that is examining the status of free speech at work through 17 in-depth interviews of employees in Australian organisations.³ The project provides insights into what managers and non-managerial employees in Australian organisations take a right to freedom of speech to mean within workplace settings; their opinions about their capacity to speak freely in the workplace; and how they make sense of any difference between their rights and capacities to speak freely at work. This paper provides a description and analysis of some of the findings so far.

Qualitative findings

Interviewees were asked four broad questions: What does 'free speech' mean?; Do people have a right to workplace free speech?; How free is speech really at work? and How can people's current capacity to express themselves freely be explained? These

questions were used as a starting point from which to explore interviewees' understandings of their rights and capacities.

What does free speech mean?

This question sought to establish what interviewees took free speech to mean and what we, therefore, were to talk about in the rest of the interview. The question focused firstly on free speech in the broader society, before narrowing to a workplace context.

With respect to free speech in the broader society, perhaps reflecting the pervasiveness and importance of free speech as a principle, most of the interviewees without prompting put forward a definition that resonated with the dictionary definition quoted in the introduction to this paper. As one interviewee put it:

I would say it's your ability to say whatever you are feeling, it doesn't matter what people ... think of you, you should be able to say how you feel, anytime.

Resonating with Campbell's⁴ challenge to purely state-centred studies of human rights, none of the interviewees limited free speech to the political realm. Rather they saw it as about being able to speak freely without recrimination from any authority figure. As one interviewee stated:

It could be in anything, ... a sporting club or something like that. It would just be for you ... to have your opinion on how things are conducted. For example, if I was playing netball, it might be me telling the coach about how I feel about her coaching strategy.

And for the people interviewed this also meant authority figures in organisations such as managers and supervisors.

Having said all this, many interviewees suggested that there are limitations that reasonable people should accept. They spoke of speaking within the limits of civility and decency and being respectful of others' views and beliefs.

Do people have a right to workplace free speech?

In order to deepen our understanding of interviewees' views on free speech, we explained the distinction between a person's right to something and their actual capacity or opportunity to exercise this right. That is, it was suggested that someone may have a 'right' to speak freely within a particular context but little capacity or opportunity to actually do so. All the interviewees were readily able to grasp the meaning of this distinction, and thus were asked what rights as opposed to capacities they thought employees have. Responses are summarised below in terms of the interviewees' positions in their organisational hierarchies.

Senior managers

Senior managers claimed that employees have a *prima facie* right to reply on disciplinary matters and express an opinion on *any* work issue, especially how it should

be done. Interestingly, they drew a close connection between free speech and employee participation in management decision making. That is, senior managers appeared to take the term ‘free speech’ to be a synonym for worker’s participation. Nevertheless, they suggested that there are some limitations on free speech at work. For example, there is an expectation that employee speech will be civil, respectful, and ‘constructive’. Moreover, they tended to identify one-to-one meetings between managers and non-managers, and management-organised formal staff meetings as the legitimate forums for speaking freely. Such meetings, they suggested, allow employees to voice their opinion or raise concerns in an acceptable way and at an appropriate time and place. One manager also argued that people must understand that there will always be a time limit on free speech. He argued that, while employees have a right to raise issues, once a decision has been made and enacted they do not have a right to question the decision continually or advocate change.

Middle managers and non-managers

Middle managers and non-managers suggested that, roughly, they have the same right to speak freely at work as in civil society, especially on questions of how work tasks should be undertaken. They did not, however, suggest that they have a right to speak about any issue. As the following quotation suggests, one interviewee claimed that there are likely to be some higher level policy issues affecting owners’ financial interests that employees should not be seen as having an automatic right to discuss.

It depends I think, ... if there is a policy that is going to affect the [owners] directly, financially, ... just because you work here doesn’t mean you have the right to discuss that information.

Moreover, many middle and non-managers argued that they do not have a right to speak uncivilly, disrespectfully, or ‘unconstructively’. Nevertheless, all saw the right to free speech as extremely important.

How free is speech really?

So it would seem that for all the interviewees a right to free speech is recognised, albeit within limits. They were then asked how freely employees actually are to voice their opinions.

Senior managers

According to the senior managers, despite rights, employees do not speak as freely at work as they, the senior managers, would like them to. Most argued that participation arrangements have not lived up to their promise. Many employees are still reluctant to raise grievances or express opinions. Moreover, they admitted that employees are often not asked to give opinions and, while they have a right to speak negatively about the company, they must do so through proper channels and with the proper ‘tone’.

Middle managers

Middle managers also described a gap between rights and capacities. They argued that their capacity to speak is restricted by their position in the management hierarchy. They

are often the ‘meat in the sandwich’ and may be sympathetic to employee’s grievances but must follow the company line. They also suggested that middle managers must be politically astute about how and what to communicate to senior management and careful about making ‘off-the-cuff’ remarks. They as employees may be encouraged to express their own views, but they must take into account the political nature of organisations and their place within it.

Non-managers

While a few non-managers claimed *they* are free to speak at work all suggested that they must raise issues in a ‘professional’ manner. What they meant by ‘professional’ was difficult to clarify but generally went to such things as being careful about how to express emotion, and ensuring that one is always being constructive rather than simply negative or ‘unreasonable’.

Further, it was argued non-managers cannot simply say what they think; they must learn to speak to different managers in different ways depending on the manager’s personality and seniority. For example, one employee argued that it is important to be very careful when questioning her manager’s work. She suggested that it is important to use humour and be gentle.

In addition, it was argued that many individuals are reluctant to speak up. This reluctance is suggested in the following quotation, where the interviewee was clearly attempting to explain very carefully that one must be careful about what one says.

In the workplace I think freedom of speech ... I feel that you can only say ... I mean you can say certain things, but you think about things before you say them. That’s how I think about it. Freedom of speech in the workplace is a funny one for me because I just think about things before I say them so I’m making sure that maybe I don’t say the wrong thing, or maybe ... yeah, I make sure that I don’t.

Many non-managers also suggested that, while it is easy to talk about how work might be done more effectively, this is not the case when it comes to grievances. When raising grievances one must be professional and ‘politically correct’.

How can people’s current capacity to express themselves freely be explained?

An obvious follow-up question here was to ask why there is a difference between rights and capacities. More accurately, why do the interviewees think that, while they have a right to free speech, their actual capacities are limited?

Senior managers

Senior managers mostly argued that the problem is that, despite a right to free speech and despite company participation schemes, employees *choose* to remain silent. As an explanation, they pointed to early conditioning, for example at school, which causes people to be deferential towards and reluctant to speak freely with people in authority.

They did not, however, seek to argue that it was all a matter of childhood conditioning. They acknowledged that past company cultures where people had been sanctioned for being too vocal were causes of silence and that this was exacerbated by non-work responsibilities such as mortgages. They also pointed to strong cultural norms around what and how people should speak at work and to the fact that some managers are poor communicators who cannot take criticism, or who lack affinity with staff.

Further, they suggested that speaking freely is problematic because of the political nature of organisational life. Organisations contain competing coalitions and therefore employees have to be careful with whom they share information. Likewise, the politics of career progression means that people who ‘rock the boat’ can be marginalised. As one senior manager argued,

people who more freely express themselves are seen as mavericks in the system and not the norm of the system. They are seen to be shelf dwellers. Their careers don’t go much further than where they are and they tend to often become bitter and twisted and withdraw back into ‘what’s the use of saying something, they won’t listen to me anyway’. So we condition them.

Middle managers

Middle managers also acknowledged the limits associated with organisational cultures, past and present. They also echoed the senior manager’s point about the politics of career progression. They have to carefully measure how and what to say in order to advance, and raising too many problems can destroy a career.

Question: They are trying to push a line of openness, participation, everybody involved in decision making and being open about issues and problems. But you’re saying that’s all very well and good but one has to be a bit cautious?

Answer: That’s right, yeah. Just from my own point of view, I believe that you can’t go bull at a gate because there is going to be a point where they will also cut their losses with you ... look, I’d hate to be thought of as a ‘problem’ employee.

Non-managers

Non-managers also spoke about company histories, organisational cultures, organisational politics and the risk of careers being compromised by voicing grievances or speaking ‘un-professionally’. Some also argued that they become disheartened by the gap between the rhetoric of participation and the reality that many of their ideas are ignored.

In addition, they argued that a major reason for silence was poor management skills. That is, many managers are bullies, disinterested, aloof or just too busy and this muffles free speech.

Some also argued that speech is constrained by performance imperatives and time constraints. Finally, one interviewee argued that there will always be limits to what can be raised, because organisations are not democracies. They are hierarchical structures where the goals are set before an employee starts, so there will inevitably be limits to what can be raised.

Analysis

Perhaps the most striking result of the interviews is the difference between senior managers and non-managers' views about why employees do not speak freely. The senior managers emphasised the autonomous, albeit conditioned, choice non-managers' make not to speak; the non-managers emphasised workplace norms and management mistakes and attitudes as driving their reluctance. The senior managers think they are doing all they can to seek out input from non-managers, while non-managers think managers fail because they are bullying, disinterested, distant or busy.

These differences are not surprising. Workplaces are rarely egalitarian institutions. They have power structures that influence managers' and non-managers' perceptions on most matters and we should not expect free speech to be an exception.⁵ The power structure of any organisation is likely to mean that employees will be reluctant to speak candidly to those who hold higher positions. The fear of negative repercussions for saying the 'wrong thing' to powerful others is always present. Moreover, this means those who hold higher positions are quite likely to face frustrations in their efforts to promote open communication.

Managers who wish to promote free speech should take a closer at this issue and should avoid putting non-managers' reticence about speaking freely all down to choices independent of managers' actions and place in organisations. Even if those managers who think that early conditioning causes non-managers to be too deferential are correct, conditioning is unlikely to be the whole story. No one is more conditioned to speak their minds than academics, yet it can be suggested that many are hesitant to do so when face-to-face with university power structures. Managers need to take seriously the fact that power is unequally distributed in organisations, and, despite noble motives, this will have a chilling effect on non-managers when it comes to speaking candidly on controversial matters. Managers who do not take this seriously are much like a lecturer who cannot understand why students are hesitant to challenge his or her ideas and positions in class. The lecturer must take special care to develop the level of trust that students need in order to speak freely. The lecturer cannot develop that trust without being aware of, and understanding, the students' perceptions of the power difference between them. Likewise, in order to develop the level of trust that non-managers need in order to speak candidly about workplace issues, managers must be aware of, and understand, non-managers' perceptions of the power dynamic between them.

A serious look at power structures will demonstrate to managers that they must rethink some of their attitudes about workplace free speech. If they truly are serious about promoting open communication they must develop a better understanding of what the right to free speech in the workplace entails. We believe that the managers interviewed lack that understanding, and that this contributes to the differences in perceptions that

the interviews revealed. We also suggest that this ignorance on the part of managers may be widespread.⁶

In particular, we believe that it is likely that managers lack an adequate understanding of the justified restrictions on free speech in the workplace. We suggest that because they believe that they can restrict free speech in instances where they actually lack justification. They exacerbate the chilling effect of organisational power structures. It is likely that unwittingly, but sometimes with full comprehension, their unjustified restrictions will exacerbate non-managers' reluctance. If, however, managers were to develop an adequate understanding of the justified restrictions on free speech and demonstrate to non-managers a respect for the boundaries those justified restrictions set, they could avoid exacerbating and begin lessening the chilling effect of power. For these reasons, we will explore those justified restrictions in the rest of this section.

The senior managers interviewed are correct to assert that the right to free speech in the workplace is not absolute. There is considerable agreement on this point among business ethicists. Campbell⁷ for example points to, *inter alia*, the close working conditions of most workplaces and suggests that this makes 'it reasonable to restrict the expression of controversial and possibly offensive speech in the interest of internal harmony'. Further he points to consequential arguments to do with the efficiency of workplaces in a competitive market environment, as a countervailing weight to any unfettered right to workplace free speech.

Likewise, Werhane writes, 'This right is not absolute, ... and so may be overridden in some cases.'⁸ Ladenson in the USA compares the justified restrictions on free speech in the workplace to the time, manner and place restrictions in First Amendment cases in the US judicial system. He writes, 'employees should be able to say anything they want, but not necessarily at any time or place or in any manner they choose'.⁹ In this way, the right to free speech in the workplace is like the right to free speech in other contexts. As the classic example demonstrates, I do not have the right to yell 'FIRE!' in a crowded theatre just because I think it desirable to do so. Likewise, employees do not have the right to say anything they wish at any time or place they wish just because they think it desirable to do so.

Business ethicists, however, are in less agreement about the philosophical basis of the justified restrictions on free speech in the workplace. Werhane ties those restrictions to other moral rights. She writes, 'the right to free expression *can* be set aside when the "greater harm" might be the loss of some other person's right to freedom'.¹⁰ She adds, 'one set of freedoms can be set aside when other equal rights are at stake'.¹¹ Ladenson limits the justified restrictions by emphasising the important role free speech plays in individuality. He writes, 'content-based restrictions upon employee speech are never justifiable. Even if what an employee says disrupts the normal corporate decision-making and administrative routines, this price should be paid in order to foster the development of individuality.'¹² And Campbell, *inter alia*, points to the importance of self-expression to a person's dignity.

Accepting that the freedom to choose must be limited in a workplace that requires complex cooperative interaction, there seems no reason why self-expression cannot and therefore should be allowed to flourish in the work environment. Moreover it would seem to be an insult to any human

being and a failure to respect their humanity, not to listen to their views and take them seriously into consideration, with respect to the work that they as employees are expected to perform. While there may be disagreement about the extent of the importance of what might be regarded as no more than a courtesy, the nature of the reason for sincerely consulting employees with respect to their workplace activities is demonstrably within the compass of human rights values.¹³

Despite these differences, there is much for managers to learn about the justified restrictions on free speech. No matter which basis of the justified restrictions one adopts, one can identify potential difficulties with the views that some of the managers interviewed hold.

Consider the managers' view that free speech should be limited to appropriate forums such as one-to-one meetings and formal staff meetings. Very little charity is necessary to find a noble intention behind this view. By claiming that free speech should take place only in appropriate forums, the manager likely is trying to prevent disruptions and keep the workplace operating smoothly. It is likely that few people, including staunch advocates of free speech in the workplace, would suggest that it is appropriate for employees to disrupt the workplace or interfere with the firm's operations simply because they wish to speak freely. Employees who do so fail to use appropriate channels, and, as Lippke claims, are likely to be subject to justified disciplinary action. One need only think of an employee who uses free speech to harass another employee with whom he or she has a grudge.

Despite the noble intentions likely motivating many managers holding this view, it is laden with pitfalls. As Lippke claims, it is incumbent on employers to provide appropriate forums for employees to speak freely in ways that do not disrupt the workplace. If they do not, they should not be surprised when non-managers are reluctant to speak freely. Moreover, given the distribution of power in workplaces, establishing forums that work is unlikely to be easy. Forums that seem perfectly reasonable to managers may not provide non-managers with the confidence they need to speak freely.

The suggestion of one-to-one meetings might be one such forum. At first glance, they make perfect sense. If one has problems with a manager, one ought to address them with that manager rather than involve other members of the firm. The more people involved, the more likely the free speech is to be disruptive. Those who have spent time in a workplace know how quickly disruptive rumours can spread. The more people who are privy to the problem, the more quickly the rumours are likely to form and spread. Managers may think they are more able to respond in a constructive manner one-to-one and thus more able to constrain the potential disruptive impact of the issues concerned. However, they need to consider one-to-one meetings from the perspective of non-managers. For non-managers one-to-one meetings involve interacting face-to-face with more powerful others and this can chill free speech. As there is power in numbers, managers must, therefore, be open to approach by groups of employees. That is, in many instances, we suggest, non-managers are more likely to speak freely when part of a group. Just as one might argue that victims of bullying should be advised to approach managers with others to support them, we should them to do the same when it comes to speaking freely about many other controversial matters. Managers must accept and be

open to such approaches and respond constructively, rather than seek to restrict collective acts of speech.

It could be argued that emphasising formal staff meetings may provide the power in numbers that many non-managers need. Presumably, at such meetings an employee who wishes to speak would be surrounded by peers who can provide support. If so, that may counteract the chilling effect of organisational power structures.

Unfortunately, staff meetings also can have the opposite effect. Too often, staff meetings exacerbate the problems caused by power structures because they are designed and established by managers and governed by management-initiated norms and rules. In such cases, the chilling effect of power may be strong even if an employee is surrounded by peers. For this reason, managers must recognise that the capacity of formal staff meetings to produce free speech from non-managers is limited. Thus, they must be open to other forums where the norms are more jointly devised if they wish to encourage non-managers to speak freely.

Lastly, we will consider the senior manager's claim that there is a time limit on free speech. To the extent that other managers hold this view, it will also cause problems with respect to justified restrictions on free speech in the workplace. The view that there is a time limit on free speech suggests that, once management has made a decision, an employee has no right to continue to speak out against the decision. One can see that this view is obviously false when one considers a case of justified whistleblowing. An employee wishing to speak out regarding a firm's legal or ethical wrongdoing should not be stopped by management on the grounds that a decision has been made. This restriction would violate the employees' autonomy and help to perpetuate wrongdoings.

There is another important problem with this time-limit restriction. To see this problem one has to assume neither bad faith on the part of a manager nor wrongdoing on the part of the firm. Suppose a manager makes every effort to come to a good decision about a workplace matter. The manager involves rank-and-file employees in the decision-making process by providing them with ample appropriate forums to speak freely on the matter and by considering their ideas in good faith. After long hours, the manager comes to a decision that is counter to the position of a small minority of employees. According to the time-limit view, the employees cannot speak out against this decision in the future. Suppose, however, that they later become aware of new information that bears on the firm's activities that result from the earlier decision. The manager should not see these employees as troublemakers who have breached the time-limit rule if they bring this information to light in appropriate forums. Instead, the manager should recognise that the employees have every right to bring the new information to light and, in fact, may be obligated to do so if the information indicates that the firm causes some kind of harm because of the decision the manager made previously.

The upshot of this examination of the senior managers' restrictions on free speech is this: even if the manager operates in good faith, there are good reasons to reject these restrictions. They oversimplify the issues involved with free speech in the workplace by focusing only on management's desire to keep workplaces operating efficiently. Although that desire is justified, it cannot be pursued at all costs. Management must consider the benefits of free speech and temper accordingly the pursuit of their desire to keep workplaces operating smoothly. We as proponents of free speech in the workplace

have no desire to produce conditions that prevent the efficient operation of workplaces. Nevertheless, employees must be able to speak freely on certain matters even if doing so impedes workplace operations. Allowing employees to do so benefits both society and employees. Society benefits from those instances where free speech helps to prevent firms from harming the public. Employees benefit from the promotion of their autonomy, as Ladenson describes, ‘the development of individuality’,¹⁴ and, as Campbell suggests, their humanity.

The overarching point of this philosophical analysis of the qualitative interviews is to motivate managers to take a closer look at their own views on the justified restrictions on free speech in the workplace. In order to do so, they need to step away from their desires to keep workplaces operating smoothly and consider the circumstances that are necessary in order for non-managers to speak freely regarding controversial workplace matters. Non-managers’ silence is not simply a choice they make, as some of the senior managers believe. It is more likely a result of the chilling effect the workplace’s power structures will have on people’s willingness to speak up. Unless managers develop a better understanding of the justified restrictions on free speech, they will continue to exacerbate that chilling effect. If they develop a better understanding, they are likely to be in a better position to develop the appropriate forums in which non-managers can speak freely. Just as a professor who develops and demonstrates a proper understanding of the limits of the professor’s justified authority is better able to develop the trust that enables students to engage and challenge the professor’s ideas in class, managers who develop and demonstrate a proper understanding of the limits of their authority to restrict employees’ speech in the workplace will be better able to promote constructive free speech from non-managers.

Conclusion

The few academic writers who have written about free speech in the workplace claim that it should be an important right. Based on these findings, it would appear that at least for the employees and managers interviewed this is indeed the case. The existence of a right to free speech, within the bounds of civility, was asserted by everyone interviewed. For the writers concerned about the recognition of rights this is perhaps a pleasing finding. However, their research suggests that recognition of rights is not necessarily enough. The people interviewed seem to be suggesting that the issue of rights is not the problem. Rather, the suggestion seems to be that the problem lies in their actual capacity to exercise these rights. People may have a right to free speech in the workplace but this right is not matched by practice. Given this, one possible suggestion is that where senior managers and other policy makers place a value on employees being able to speak freely they should, regardless of any legal, legislative or corporate policy initiatives aimed at formalising rights, focus on developing strategies that will break down barriers to employees’ opportunities, abilities or capacities to freely express themselves.

In this regard, the interviewees described some of the barriers they saw as important including broader socialisation processes, older less participative cultures, the politics of career progression and managerial competencies. It is beyond the bounds of this paper to discuss strategies specifically aimed at these barriers in depth, but it would be fair to say that we believe that allowing employees to act collectively and in accordance with jointly agreed norms and rules may be one path to take. What type of collective, be it

unions or some other form, and what kinds of norms and rules are needed, we suggest, needs more consideration. This, plus broader philosophical concerns, will thus be the focus of further work.

¹ F Schauer, *Free speech: a philosophical enquiry*, Cambridge University Press, Cambridge, 1983.

² For works in the area see T Campbell, 'Workplace freedom of expression', *Proceedings – International Institute for Public Affairs Biennial Conference*, , Restructuring the Public Interest in Globalising World: Business, the Professions and the Public Sector, Brisbane, 4–7 October 2002; R Lippke, 'Speech, conscience, and work', *Social Theory and Practice*, vol 18, 1992, pp 237–258; D Yamada, 'Voices from the cubicle: protecting and encouraging private employee speech in the post-industrial workplace', *Berkeley Journal of Employment and Labor Law*, vol 19, no 1, 1998, pp 1–59; LC Barnett, 'Maintaining order in the post-strike workplace', *Berkeley Journal of Employment and Labor Law*, vol 15, no 1, 1994, pp 87–96; WA Haskins, 'Freedom of speech: construct for creating a culture which empowers organizational members', *Journal of Business Communications*, vol 33, no 1, 1996, pp 85–97.

³ A qualitative in-depth interview design was adopted for the project because it was decided it would best enable a robust picture of people's understandings of their rights and capacities for free speech in the workplace to be built. Qualitative methods such as in-depth interviews allow the time and interaction needed to establish 'thick' descriptions. That is, they allow researchers to build comprehensive pictures of how the people they are researching understand their world. For this project, both men (9) and women (8) of varying ages and managerial seniority were interviewed. Five interviewees were senior executives in their organisation four occupied a middle management position and eight were non-managerial employees. The interviews took place in five medium to large organisations drawn from four separate industries (financial services, packaging, food manufacture, and business services). Two of the organisations were located in regional Victoria, two in regional NSW and one in Sydney. This variability provided a diverse sample of interviewees whose personal histories and work contexts were quite heterogeneous. The in-depth interviews went for between one and four hours.

In drawing on the interviews no claim is made about the *statistical generalisability* of the issues raised to the broader population of managers and employees. Our goal was to build a rich picture of a selection of managers' and employees' understandings of their rights and capacities to speak freely at work. This picture can then be used to reflect on broader possibilities and one that we hope will resonate with other managers and employees. As such it will be used as a basis for further research and reflection. In particular, the intention is to use the finding to reflect on and evaluate philosophical theories of free speech.

⁴ Campbell, op cit.

⁵ For a discussion of power structures in organisations see S Clegg, M Kornberger and T Pitsis, *Managing and organizations: an introduction to theory and practice*, Sage Publications, London, 2005, ch 5.

⁶ This is an issue to be investigated through survey research at a later date.

⁷ Campbell, op cit, p 10.

⁸ P Werhane, 'Individual rights in business' in T Regan (ed), *Just business: new introductory essays in business ethics*, Random House, New York, 1984, p 115.

⁹ RF Ladenson, 'Freedom of expression in the corporate workplace: a philosophical inquiry' in WL Robison, MS Pritchard and J Ellin (eds), *Profits and professions: essays in business and professional ethics*, Humana Press, Clifton, New Jersey, 1983, p 283.

¹⁰ Werhane, op cit, p 117.

¹¹ Ibid, pp 117–118.

¹² Ladenson, op cit, p 283.

¹³ Campbell, op cit, p 13.

¹⁴ Ladenson, op cit, p 283.