

POLICY ON THE PROTECTION OF WHISTLEBLOWERS (DRAFT FOR CONSULTATION)

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INTERNAL DOCUMENT – not for external distribution

This policy must not be distributed as an official AI statement, and is not intended to provide text which can be copied directly into external documents. The aim of the document is to provide AI staff and members with an overview of AI's policy on this topic, including where to find more specific guidance and advice. If there are questions not covered within this note, please send them to Law and Policy Advice (lawpoladvice@amnesty.org). The policy will be revised in future in light of comments or queries arising from it, so please use the online version if possible rather than printing a copy for future use.

INTRODUCTION

The right to freedom of expression includes freedom to seek, receive and impart information and ideas of all kinds. It is key to enabling individuals to exercise their other human rights. The right to report wrongdoing is a natural extension of the right to freedom of expression.¹ Whistleblowers have played an essential role in exposing wrongdoing that threatens human rights, the rule of law, financial integrity, public health and safety. Some of the most significant recent revelations of human rights violations come from disclosures of information relating to the misconduct of security agencies, such as shocking evidence of global mass surveillance programmes disclosed by Edward Snowden.

In disclosing information whistleblowers very often take a personal risk and are highly vulnerable to retaliation. Amnesty International has worked to highlight and support campaigns on behalf of whistleblowers exposing human rights violations, including Edward Snowden, Chelsea Manning and Mordechai Vanunu.² Amnesty International has also documented cases in which employees that exposed labour and other human rights abuses were threatened by the company after speaking of the poor working conditions they were subjected to.³

Decision 10 of the 2017 International Council Meeting (ICM) requested the International Board to develop a policy on the protection of whistleblowers that includes a clear definition and criteria so that Amnesty International is able to take a position on their behalf and which takes recent developments at national, regional and international level into account. Overall, the aim of this policy is to enable the development of a strategy that can better engage with whistleblowers, both in the private and public sector, and influence legislative debates in this regard.

Amnesty International's position generally aligns with the civil society-led Global Principles on National Security and the Right to Information ("Tshwane Principles" - see reference in the Further Reading section below), subject to more protective aspects contained in the present policy document. These Principles have gained support from UN⁴ and region-

¹ See United Nations, Report of the Special Rapporteur on the Promotion of the Right to Freedom of Opinion and Expression (2015), p. 4 and Council of Europe, Protection of Whistleblowers, Recommendation CM/Rec(2014)7 and Explanatory Memorandum (2014), p. 15.

² See inter alia "US must not prosecute whistleblower Edward Snowden", 2 July 2013 (<https://www.amnesty.org/en/latest/news/2013/07/usa-must-not-persecute-whistleblower-edward-snowden/>) and "USA: Leaving Edward Snowden in limbo will be a stain on President Obama's legacy", 14 September 2016 (<https://www.amnesty.org/en/latest/news/2016/09/leaving-edward-snowden-in-limbo-will-be-a-stain-on-president-obamas-legacy/>); "Israel: Drop Latest Charges Against Whistle-blower Mordechai Vanunu", (MDE 15/3999/2016) 10 May 2016 (<https://www.amnesty.org/en/documents/mde15/3999/2016/en/>); "USA: Chelsea Manning finally free after cruel ordeal", 17 May 2017 (<https://www.amnesty.org/en/latest/news/2017/05/chelsea-manning-finally-free-after-cruel-ordeal/>)

³ See inter alia "The great palm oil scandal: Labour abuses behind big brand names", (ASA 21/5184/2016), 30 November 2016 (<https://www.amnesty.org/download/Documents/ASA2151842016ENGLISH.PDF>); "Indonesia: Government must investigate Wilmar labour practices as company attempts to cover up abuse claims", 7 March 2017 (<https://www.amnesty.org/en/latest/news/2017/03/indonesia-government-must-investigate-wilmar/>)

al⁵ mechanisms; its Parts VI and VII focus on public sector whistleblowers while the scope of the present policy is broader.

This policy is an internal document not intended for publication as such. However, the recommendations and policy positions in it will be reflected in Amnesty International's future work and recommendations to governments and other bodies on this issue, and thereby be put in the public domain.

1. CONCEPTS AND TERMINOLOGY

Whistleblower. A whistleblower is any person who, in the context of their work-based relationship whether it be in the public or private sector, discloses or reports information indicating wrongdoing that has occurred, is occurring or is likely to occur.

This includes individuals who are outside the traditional employee-employer relationship, such as consultants, contractors, trainees, interns, volunteers, student workers, and temporary workers. It includes individuals whose work-based relationship has ended and, possibly, where it is yet to begin in cases where information indicating wrongdoing has been acquired during the recruitment process or other pre-contractual negotiation stage.

Defining “whistleblower”

There are different approaches to defining “whistleblower” – a broad approach is taken here in line with Transparency International's Principles for Whistleblower Legislation (2013) and Recommendation CM/Rec(2014)7 adopted by the Committee of Ministers (CoM) of the Council of Europe (CoE). The Tshwane Principles (2013) on the other hand focus on the disclosure itself and whether it is a “protected” one (references to these documents are included in the Further Reading section below).

In related policies, such as the policy on Human Rights Defenders (see [policy summary on human rights defenders](#)) and Prisoners of Conscience (see [policy summary on prisoners of conscience](#)), Amnesty International will only adopt the definition of “human rights defender” or “prisoner of conscience” if the criteria in the respective policy for doing so are met. It is considered however that adopting such an approach in this policy is potentially too restrictive. Whistleblower cases do not always meet internationally accepted standards governing whether a disclosure should be “protected”; for example, Chelsea Manning arguably revealed more information than was reasonably necessary to expose the wrongdoing and may therefore have failed to meet the criteria for protection of disclosures included in this policy and in other principles and standards referenced herein. However, she was considered a “whistleblower” by the human rights movement, including Amnesty International.

To address these concerns, Amnesty International adopts a broad definition of “whistleblower” but assumes a different approach to cases depending on whether the full criteria for protection in principle 2 below are met or not. So, for example, under the current policy, Amnesty International's position is that although Chelsea Manning's disclosure did not meet the criteria for protection (principle 2), she would have been entitled to a public interest defence that the public interest in disclosure of the information in question outweighs the public interest in non-disclosure (principle 3 below). This aligns with the approach Amnesty International took at the time in its public campaigning for Chelsea Manning to be pardoned. Adopting a broad approach accompanied with clear strategic criteria for engagement allows Amnesty International flexibility in considering a person a whistleblower and avoids the risk of limiting opportunities for engagement that a more specific or restrictive definition may present.

It is important to note that legislation in France, Kosovo and Malaysia goes further by allowing anybody to make a

⁴ See United Nations, Report of the Special Rapporteur on the Promotion of the Right to Freedom of Opinion and Expression (2015), p18 (https://www.un.org/en/ga/search/view_doc.asp?symbol=A/70/361)

⁵ See Reports, Resolutions and Recommendations adopted by the Parliamentary Assembly of the Council of Europe, available here: <http://assembly.coe.int/nw/xml/XRef/Xref-DocDetails-EN.asp?FileID=20190&lang=EN> ; <http://assembly.coe.int/nw/xml/XRef/Xref-DocDetails-EN.asp?FileID=20194&lang=EN> ; <http://assembly.coe.int/nw/xml/XRef/Xref-DocDetails-EN.asp?FileID=20056&lang=EN>) <http://assembly.coe.int/nw/xml/XRef/Xref-DocDetails-EN.asp?FileID=21931&lang=EN> ; <http://assembly.coe.int/nw/xml/XRef/Xref-DocDetails-EN.asp?FileID=21936&lang=EN> ; <http://assembly.coe.int/nw/xml/XRef/Xref-DocDetails-EN.asp?FileID=21651&lang=EN>

disclosure, without any requirement that the individual have come across the information through their work. The French legislation requires that the individual “became personally aware” of the reported wrongdoing, without specifying where the whistleblower might have encountered the information (France, Law of Transparency, The Fight Against Corruption and the Modernisation of Economic Life (Law Sapin II), Article 6. In Malaysia, a whistleblower is defined as “any person who makes a disclosure of improper conduct to the enforcement agency” (Whistleblower Protection Act 2010 of Malaysia, Part I). In Kosovo, a whistleblower can be “a citizen or an employee” (Kosovo Law No. 04/L-043 on Protection of Informants, Article 2 Section 1.1). This broad approach is in line with Article 33 of the United Nations Convention against Corruption (UNCAC), which does not require such a link to “work”.⁶

Amnesty International adopts a definition of “whistleblower” with a link to “work-based relationships”, acknowledging that individuals in such relationships can find themselves facing a conflict between reporting wrongdoing and respecting a duty of loyalty or confidentiality to the public or private sector employer. They are also particularly vulnerable to reprisal by virtue of their ongoing working relationship. Further by virtue of their “inside” position, people at work may come across activities or information that indicate wrongdoing in ways that outsiders cannot, and also may be the first to know about a problem and therefore would be best placed to raise it before any serious harm is done. On the other hand, it is argued that members of the general public are more likely to report or disclose information indicating wrongdoing affecting them personally or members of their community.

⇒ Comments are therefore particularly invited on whether the definition of “whistleblower” in this policy should require a link to “work”.

Wrongdoing. Includes, but is not limited to, criminal offences, human rights violations and abuses, violations of international humanitarian law, corruption in the private or public sector, dangers to public health and safety, dangers to the environment, abuse of public office, miscarriages of justice, unauthorised use of public funds or property, mismanagement or waste of resources, and any other threat or harm to the public interest; and retaliation for disclosure and/or deliberate concealment of any of these.

Report. Means reporting, either internally within a public or private organisation or enterprise, or to an outside authority.

Disclosure. Means making information public or making it available to specific members of the public, including disclosures to a journalist, a member of parliament, or to third parties, including NGOs or trade unions.

Retaliation. Means

- (a) all forms of disadvantage or discrimination at the workplace, including but not limited to, dismissal, suspension, loss of promotion opportunities, punitive transfers and reductions in or deductions of wages, harassment or other punitive or discriminatory treatment;
- (b) being subject to criminal, civil or administrative proceedings, including those related to libel, slander, copyright and data protection;
- (c) being subject to physical or emotional harm or harassment; and/or
- (d) threats of any of the above.

2. GENERAL POLICY PRINCIPLES

Amnesty International will take a position on behalf of whistleblowers in line with the following general principles:

1. **Channels for reporting.** States should ensure that clear and effective channels are put in place in both the public and private sector for reports of wrongdoing, including channels for:
 - (a) internal reports within an organisation or enterprise (including to persons designated to receive reports in

⁶ Article 33 of UNCAC states: “Each State Party shall consider incorporating into its domestic legal system appropriate measures to provide protection against any unjustified treatment for any person who reports in good faith and on reasonable grounds to the competent authorities any facts concerning offences established in accordance with this Convention.”

confidence);

(b) reports to relevant public regulatory bodies, law enforcement agencies and/or independent oversight bodies.

In the design of reporting channels, target audiences should be consulted in order to develop appropriate culturally-responsive, gender-responsive and context-specific responses that identify and address any barriers to reporting and provide safe reporting mechanisms for everybody.

2. **Criteria for protection of disclosures.** A whistleblower should be protected from retaliation for disclosures of information indicating wrongdoing that has occurred, is occurring, or is likely to occur, so long as the following criteria are met:

- (a) At the time of the disclosure, the whistleblower had reasonable grounds to believe that the information is genuine and tends to show wrongdoing;
- (b) One of the following applies:
 - (i) The whistleblower reported the same or substantially similar information internally and/or to a relevant public regulatory body, law enforcement agency and/or independent oversight body, and either there was a failure or refusal to investigate the report effectively, or the whistleblower did not receive a reasonable and appropriate outcome within a reasonable and legally-defined time-frame; OR
 - (ii) Channels for internal reporting and/or reporting to a relevant public regulatory body, law enforcement agency and/or independent oversight body were not functional or could not reasonably be expected to be a viable option for the whistleblower; OR
 - (iii) The whistleblower reasonably believed that there was a significant risk that reporting internally and/or to a relevant public regulatory body, law enforcement agency and/or independent oversight body would have resulted in the destruction or concealment of evidence, including witness interference, or retaliation against the person or a third party; OR
 - (iv) The disclosure relates to an act or omission that constitutes a serious and imminent risk of danger to the life, health and safety of persons, or to the environment;
- (c) The whistleblower only disclosed the amount of information that was reasonably necessary to bring to light the wrongdoing;
- (d) The whistleblower reasonably believed that the public interest in having the information revealed outweighed any harm that would result from disclosure.

Motivation is irrelevant except where the disclosure is proven to be knowingly untrue.

Protection from retaliation should not be lost solely on the basis that the person making the disclosure was mistaken as to its import or that the perceived threat to the public interest has not materialised, provided he or she had reasonable grounds to believe in its accuracy.

A person should not be required to produce supporting evidence or bear the burden of proof in relation to their reporting or disclosure of wrongdoing.

Where a whistleblower is imprisoned solely for a disclosure that meets the criteria for protection, Amnesty International would consider that person as a Prisoner of Conscience (see [policy summary on prisoners of conscience](#)).

Amnesty International does not adopt a separate position on whistleblowers that disclose military secrets or classified or otherwise secret information. Where the disclosure meets the criteria for protection in this principle, a whistleblower should be protected from all forms of retaliation regardless of where they work or the nature of the information. Where the disclosure does not meet the criteria, the classified or otherwise secret nature of the information will be relevant in considering the extent and risk of harm to the public interest in non-disclosure in accordance with principle 3 below.

Disclosures made “in good faith”

Several international instruments⁷ and the case law of the European Court of Human Rights (ECtHR)⁸ require that disclosures be made “in good faith” and on “reasonable grounds”. This good faith requirement has generated a major policy debate – some link the good faith requirement to the information disclosed, meaning that the requirement is fulfilled if the person making a disclosure believes that the information they are providing is true. Others link the good faith requirement to the personal motivation of the whistleblower, considering protection should be limited to “honest” workers, and/or those who are motivated to speak up because they want the wrongdoing to be investigated. Thus, a good faith requirement can have the negative effect of shifting the focus from the information provided to investigating the whistleblower’s motives, exposing him or her to personal attacks. This can pose a serious deterrent to potential whistleblowers. A good faith requirement within the law in the UK was removed in 2013, in accordance with the principle that whistleblowers may have a number of motives but should be protected if they are speaking up about matters that are of public interest.⁹ In line with international standards, including the Tshwane Principles, Amnesty International’s policy makes no reference to good faith and instead refers to “reasonable grounds to believe that the information is genuine and tends to show wrongdoing”.

3. **Public interest defence.** Whenever the disclosure does not meet the criteria for protection (because for example, a whistleblower has not attempted to use internal channels or has disclosed more information than was reasonably necessary), and a whistleblower may be subject to disciplinary action at work, criminal or civil proceedings, or administrative sanctions, including those related to libel, slander, copyright and data protection, a whistleblower should be entitled to rely on a public interest defence if the public interest in disclosure of the information in question outweighs the public interest in non-disclosure.

In considering whether the public interest in disclosure outweighs the public interest in non-disclosure, decision-makers should look at factors including, but not limited to:

- (a) whether the extent of the disclosure was reasonably necessary to disclose the information of public interest;
- (b) the extent and risk of harm to the public interest caused by the disclosure;
- (c) the extent of the wrongdoing and the risk of harm to the public interest in non-disclosure;
- (d) whether the person had reasonable grounds to believe that the disclosure would be in the public interest;
- (e) whether the person attempted to report through internal channels and/or to a relevant public regulatory body, law enforcement agency and/or independent oversight body;
- (f) the existence of exigent circumstances justifying the disclosure.

⁷ For example, article 33 UNCAC (*supra* note 6), the OECD Anti-Bribery Convention, and the Civil Law Convention of the Council of Europe on Corruption.

⁸ See *inter alia* *Guja v Moldova* 14277/04 (2008); *Heinisch v Germany* 28274/08 (2011); and *Bucur and Toma v Romania* 40238/02 (2013). The case-law of the ECtHR establishes six criteria that whistleblower disclosures need to meet in order to benefit from the protection of Article 10 of the Convention. First, the disclosure should correspond to a strong public interest. There should be no other effective means of remedying the wrongdoing which the employee intends to uncover. The interest which the public may have in that particular information should be strong as to override a legally imposed duty of confidence. The damage, if any, caused as a result of the disclosure should not outweigh the interest of the public in having the information revealed. The disclosure should not be motivated by a personal grievance or a personal antagonism or the expectation of personal advantage, including pecuniary gain. Last, in making the disclosure, the whistleblower should have acted in good faith and in the belief that the information was true and that it was in the public interest to disclose it.

⁹ Dame Janet Smith DBE, *The Shipman Inquiry, Fifth Report - Safeguarding Patients: Lessons from the Past - Proposals for the Future* (2004), p. 344. In Australia, the good faith requirement was also partly removed (Fair Work (Registered Organisations) Amendment Act 2016, s.230H (deleting former paragraph 337A(c)) and there are recommendations to remove it completely (Joint Parliamentary Committee on Corporations and Financial Services, Whistleblower Protections, Parliament House, Canberra (September 2017), Recommendation 6.6).

4. **Protection of associated persons.** Protection from retaliation should not be limited to whistleblowers but should be extended to all individuals at risk of retaliation as a consequence of whistleblowing. This should include individuals who are about to make a report or disclosure of wrongdoing; individuals assisting or attempting to assist others with whistleblowing; individuals who provide supporting information regarding a report or disclosure; any person wrongly identified as a whistleblower; and family members.
5. **Protection from physical harm or harassment.** Even where the criteria for protection of disclosures are not met, a whistleblower and any associated persons, including their family members, should be protected from retaliation in the form of physical harm, or threats of harm, or harassment.
6. **Confidentiality.** Whistleblowers should be entitled to have the confidentiality of their identity maintained, including where they report or disclose information anonymously but are subsequently identified, subject to fair trial guarantees.

Where it is not possible to investigate, and/or take action against those responsible for the wrongdoing reported or disclosed without relying directly on the evidence of the whistleblower and revealing his or her identity, those investigating and/or taking action, whether in the public or private sector, should seek the explicit consent and cooperation of the whistleblower, and address any concern that he or she might have about their own position.

This principle recognises that protecting the identity of a whistleblower can occasionally conflict with the right to fair trial and due process.

7. **Acting on reporting and disclosure.** Where a whistleblower reports or discloses wrongdoing that has occurred, is occurring, or is likely to occur, an employer and/or an appropriate public regulatory body, law enforcement agency or independent oversight body should:
 - (a) investigate the alleged wrongdoing and take prompt measures with a view to resolving the matters in a legally-specified period of time, or, after having consulted the whistleblower, to refer it to a body that is authorised and competent to investigate;
 - (b) protect the identity of the whistleblower in accordance with principle 6 above;
 - (c) protect the information disclosed and the fact that a disclosure has been made except to the extent that further disclosure of the information is necessary to remedy the wrongdoing;
 - (d) notify the whistleblower of the progress and completion of an investigation and, as far as possible, the steps taken or recommendations made.
8. **Remedies for retaliation.** Whistleblowers and associated persons, including their family members, who are subject to retaliation should be able to access comprehensive and effective remedies, financial and others, covering all direct, indirect, past and future consequences of detriment suffered.

The burden of proof should be placed on the employer and any relevant State authority or public body to establish that any detriment suffered by the whistleblower was in no sense related to, or motivated by, a whistleblower's reporting or disclosure of wrongdoing.

Any person should have the right to report to a relevant public regulatory body, law enforcement agency and/or independent oversight body and/or to a judicial authority any measure of retaliation, or the threat of retaliation, in relation to reports or disclosures. Such bodies should be required and empowered to effectively investigate a reported retaliation or threat of retaliation.

9. **Personal protection measures.** Whistleblowers and associated persons, including their family members, whose lives or safety are in jeopardy are entitled to receive personal protection measures

3. STRATEGIC CRITERIA FOR ENGAGEMENT

Based on the above general principles, Amnesty International calls on all States to put in place normative, institutional and judicial frameworks to protect whistleblowers in the public and private sectors. These frameworks should foster a safe and enabling environment that encourages reporting or disclosure of wrongdoing in an open manner, in accordance with the rights to freedom of expression and access to information.

Amnesty International works to ensure human rights are respected and protected everywhere. Amnesty International acknowledges, supports and applauds the efforts of several organisations that work to ensure the protection of whistleblowers in all sectors, regardless of the subject matter of the disclosure. Having regard to its vision and mission however, Amnesty International will only advocate for the protection of a whistleblower where the following strategic criteria are met:

1. There is a direct or reasonably direct connection between the wrongdoing and the violation or abuse of human rights; OR
2. There is a direct or reasonably direct connection between the wrongdoing and damage or risk of damage to the environment; OR
3. Regardless of the nature of the wrongdoing, the whistleblower is facing human rights violations stemming directly from the disclosure, including to their rights to life, not to be subjected to torture or other cruel, inhuman or degrading treatment or punishment, right to liberty and security of person, and right to a fair trial are infringed or at risk of such infringement.

Amnesty International does not have the capacity to actively engage with whistleblower cases generally and it is acknowledged that there are other organisations with better developed expertise in addressing the protection of whistleblowers as a standalone issue. It is noted that Amnesty International's [policy on corruption and human rights](#) states that "AI works on corruption as a cause of human rights violations. AI would not comment on a corruption case where no human rights issue was at stake and/or no victim of a violation could be identified. AI's goal is achieving greater respect for, protection and fulfilment of human rights. We will address corruption only where there is a direct or reasonably direct connection between a corrupt act (or pattern of corrupt acts) and the violation of human rights. We do not seek to address corruption outside of this goal." The strategic criteria for engagement reflect this existing policy.

4. BROADER ISSUES NOT COVERED IN THIS POLICY

This policy is related to, but is distinct from, Amnesty International's policy on human rights defenders (HRDs). In line with the UN Declaration on Human Rights Defenders and other international standards, Amnesty considers that a human rights defender is a person who, individually or in association with others, acts to defend and/or promote human rights at the local, national, regional or international levels (see [policy summary on human rights defenders](#)). Amnesty International does not consider a person to be a human rights defender if they resort to or advocate hatred, discrimination or violence, or if they deny the universality of human rights (all human rights for all) or take action that seeks to undermine the human rights of others. Where a whistleblower meets the criteria to be considered a human rights defender, both policies will apply.

Amnesty International does not consider journalists, or other individuals or members of organisations engaged in similar public interest activities, who seek, receive, possess or publish information disclosed by whistleblowers to be themselves whistleblowers. Journalistic and similar activities are addressed by Amnesty's policy on freedom of expression (see [policy summary on freedom of expression](#)) and, where a journalist or individual in a similar position is a human rights defender, also by the policy on HRDs.

Under international human rights law, the right to freedom of expression is not absolute and can be restricted where there is a legitimate aim, including for national security. However, States have an obligation to ensure that any restriction is provided by law, and necessary and proportionate to that legitimate aim. Journalists or individuals in a similar position play a fundamental role in realizing the right to seek, receive and impart information and ideas of all kinds. Amnesty International's position is that punishing journalists or individuals in a similar position for having sought, received, possessed or published information disclosed by whistleblowers about human rights violations or abuses goes beyond the permissible restrictions to the right to freedom of expression and is never justified.

5. FURTHER READING

- Human Rights Committee, General Comment No. 34, Freedoms of opinion and expression, 12 September 2011, CCPR/C/GC/3: <https://www2.ohchr.org/english/bodies/hrc/docs/gc34.pdf>.
- Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression to the General Assembly on the Protection of Sources and Whistleblowers, 8 September 2015, UN Doc. A/70/36: https://www.un.org/en/ga/search/view_doc.asp?symbol=A/70/361
- Report of the Independent Expert on the promotion of a democratic and equitable international order, 4 August 2016, UN Doc. A/71/286: <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N16/248/82/PDF/N1624882.pdf?OpenElement>
- The United Nations Convention against Corruption: Resource Guide on Good Practices in the Protection of Reporting Persons, UNODC, 2015: https://www.unodc.org/documents/corruption/Publications/2015/15-04741_Person_Guide_eBook.pdf
- The Global Principles on National Security and the Right to Information (Tshwane Principles), 12 June 2013: <https://www.justiceinitiative.org/publications/global-principles-national-security-and-freedom-information-tshwane-principles>
- Recommendation CM/Rec(2014)7 of the Committee of Ministers to member States on the protection of whistleblowers, adopted by the Committee of Ministers on 30 April 2014 and explanatory memorandum:

<https://rm.coe.int/16807096c7>

- PACE Rapporteur's Report on improving the protection of whistleblowers, 19 May 2015:
<http://assembly.coe.int/nw/xml/XRef/XRef-DocDetails-EN.asp?FileId=21651>

- Transparency International, International Principles for Whistleblower Legislation, 5 November 2013:
https://www.transparency.org/whatwedo/publication/international_principles_for_whistleblower_legislation

- Transparency International, A Best Practice Guide For Whistleblowing Legislation, 1 March 2018:
https://www.transparency.org/whatwedo/publication/best_practice_guide_for_whistleblowing_legislation

- Blueprint Principles for Whistleblower Protection: <https://blueprintforfreespeech.net/wp-content/uploads/2015/10/Blueprint-Principles-for-Whistleblower-Protection4.pdf>

- Organisation for Economic Co-operation and Development, G20 Compendium of Best Practices and Guiding Principles for Legislation on the Protection of Whistleblowers (supported by the G20 at its summit in Cannes in November 2011 as part of the G20 anti-corruption action plan): <https://www.oecd.org/g20/topics/anti-corruption/48972967.pdf>