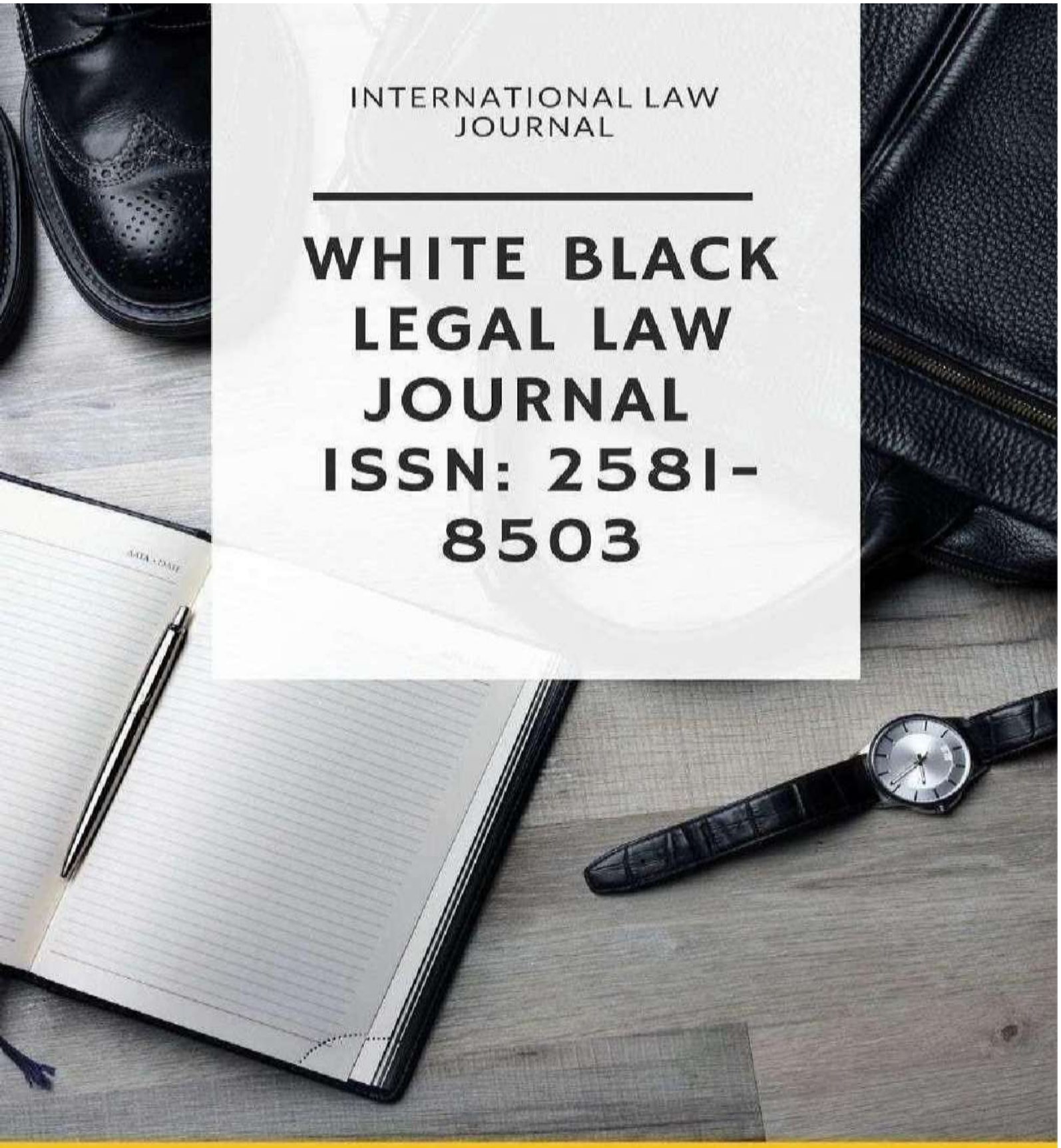

INTERNATIONAL LAW JOURNAL

WHITE BLACK LEGAL LAW JOURNAL

ISSN: 2581-8503

Peer - Reviewed & Refereed Journal

The Law Journal strives to provide a platform for discussion of International as well as National Developments in the Field of Law.

WWW.WHITEBLACKLEGAL.CO.IN

DISCLAIMER

No part of this publication may be reproduced, stored, transmitted, translated, or distributed in any form or by any means—whether electronic, mechanical, photocopying, recording, scanning, or otherwise—without the prior written permission of the Editor-in-Chief of *White Black Legal – The Law Journal*.

All copyrights in the articles published in this journal vest with *White Black Legal – The Law Journal*, unless otherwise expressly stated. Authors are solely responsible for the originality, authenticity, accuracy, and legality of the content submitted and published.

The views, opinions, interpretations, and conclusions expressed in the articles are exclusively those of the respective authors. They do not represent or reflect the views of the Editorial Board, Editors, Reviewers, Advisors, Publisher, or Management of *White Black Legal*.

While reasonable efforts are made to ensure academic quality and accuracy through editorial and peer-review processes, *White Black Legal* makes no representations or warranties, express or implied, regarding the completeness, accuracy, reliability, or suitability of the content published. The journal shall not be liable for any errors, omissions, inaccuracies, or consequences arising from the use, interpretation, or reliance upon the information contained in this publication.

The content published in this journal is intended solely for academic and informational purposes and shall not be construed as legal advice, professional advice, or legal opinion. *White Black Legal* expressly disclaims all liability for any loss, damage, claim, or legal consequence arising directly or indirectly from the use of any material published herein.

ABOUT WHITE BLACK LEGAL

White Black Legal – The Law Journal is an open-access, peer-reviewed, and refereed legal journal established to provide a scholarly platform for the examination and discussion of contemporary legal issues. The journal is dedicated to encouraging rigorous legal research, critical analysis, and informed academic discourse across diverse fields of law.

The journal invites contributions from law students, researchers, academicians, legal practitioners, and policy scholars. By facilitating engagement between emerging scholars and experienced legal professionals, *White Black Legal* seeks to bridge theoretical legal research with practical, institutional, and societal perspectives.

In a rapidly evolving social, economic, and technological environment, the journal endeavours to examine the changing role of law and its impact on governance, justice systems, and society. *White Black Legal* remains committed to academic integrity, ethical research practices, and the dissemination of accessible legal scholarship to a global readership.

AIM & SCOPE

The aim of *White Black Legal – The Law Journal* is to promote excellence in legal research and to provide a credible academic forum for the analysis, discussion, and advancement of contemporary legal issues. The journal encourages original, analytical, and well-researched contributions that add substantive value to legal scholarship.

The journal publishes scholarly works examining doctrinal, theoretical, empirical, and interdisciplinary perspectives of law. Submissions are welcomed from academicians, legal professionals, researchers, scholars, and students who demonstrate intellectual rigour, analytical clarity, and relevance to current legal and policy developments.

The scope of the journal includes, but is not limited to:

- Constitutional and Administrative Law
- Criminal Law and Criminal Justice
- Corporate, Commercial, and Business Laws
- Intellectual Property and Technology Law
- International Law and Human Rights
- Environmental and Sustainable Development Law
- Cyber Law, Artificial Intelligence, and Emerging Technologies
- Family Law, Labour Law, and Social Justice Studies

The journal accepts original research articles, case comments, legislative and policy analyses, book reviews, and interdisciplinary studies addressing legal issues at national and international levels. All submissions are subject to a rigorous double-blind peer-review process to ensure academic quality, originality, and relevance.

Through its publications, *White Black Legal – The Law Journal* seeks to foster critical legal thinking and contribute to the development of law as an instrument of justice, governance, and social progress, while expressly disclaiming responsibility for the application or misuse of published content.

www.whiteblacklegal.co.in
Volume 3 Issue 4 | Feb 2026 ISSN: 2581-8503

CONSTITUTIONAL PROTECTION OF WHISTLEBLOWERS: A COMPARATIVE ANALYSIS OF INDIA, THE UNITED STATES, AND THE EUROPEAN UNION

AUTHORED BY - SABHYA BHATIA

Abstract

Whistleblowers had always been considered guardians of democracy who exposed corruption, maladministration, and illegal activities that would remain otherwise in the dark. Yet, the act of whistleblowing comes with many personal adversities, including retaliation, intimidation, and, sometimes, death. A doctrinal and comparative study undertakes the issue of protection offered to whistleblowers in India, the US, and the EU. Under the umbrella of constitutional guarantees, statutory schemes and judicial interpretations, the study assesses whether adequate protection mechanisms stand in favour of the whistleblower. The study maintains that there cannot be statutory frameworks and independent institutions without being supported by constitutional safeguards. After citing and analysing case laws such as Guja v/s Moldova (ECHR), Garcetti v/s Ceballos (USSC), and Indian experiences of Satyendra Dubey and S. Manjunath, this paper concludes that the strengthening and operationalisation of the Whistle Blowers Protection Act of 2014 becomes an exigent need for India. The Whistleblower Directive of the EU and the US mode of multiple layered statutory protections indicate harmonization, institutional independence, and incentive mechanisms. The conclusion recommends reforms for India.

INTRODUCTION

A whistleblower-the insider-shoulders the heavy burden of imparting injustice to the public. Such disclosures concern constitutional freedoms, administrative justice, and even the accountability of public institutions. Conversely, they face punitive transfers, dismissals, criminal prosecution, or physical abuses. In India, the killing of Satyendra Dubey and S. Manjunath revealed systemic loopholes highlighting the need for protective systems.[1] In the

[1]On Satyendra Dubey and the danger faced by whistleblowers in India: "Remembering Satyendra Dubey", *Rediff* (16 December 2003) *https://www.rediff.com/news/2003/dec/16vijay.htm*; The Manjunath Murder Case' *India Today* (20 March 2007) - *https://www.indiatoday.in/india/story/manjunath-murder-case-supreme-court-life-term-awarded-iim-lucknow-243868-2015-03-11*

United States, Garcetti v/s Ceballos's doctrinal restrictions horning anticlimactically constitutional speech rights and official duties.[2] In the EU, the 2019 Directive is intended to harmonise protection across the Members States, building from the Strasbourg Jurisprudence such as Guja v/s Moldova[3]

The comparative question animating this study remains: How do constitutional, statutory, and judicial frameworks in India, the US, and the EU undergird its whistleblowers, and what sort of reforms should India consider? This paper adopts a doctrinal methodology, analysing statutes, case law, and secondary literature, while also drawing on policy reports. The research contributes by offering first, a systematic comparative framework and second, recommendations tailored to India based on international best practices.

CONCEPTUAL AND DOCTRINAL FRAMEWORK

Constitutional Foundations

Whistleblowing involves two constitutional dimensions. First, the right to freedom of expression which protects the doing of certain acts damaging to the disclosure of information in public interest. In India, the Constitution conferred Article 19(1)(a) to this freedom but subject to reasonable restrictions.[4] The US Constitution provides a strong First Amendment right but its judiciary also limits its application to public employees.[5] Against Europe, Article 10 of the European Convention of Human Rights (ECHR) gives the right to freedom of expression, which has been interpreted by Strasbourg to encompass whistleblowing under some circumstances.

Second, the right to life and personal liberty protects whistleblowers against retaliation, violence, or harassment. In India, Article 21 is no longer confined to life and liberty but is judicially extended to cover dignity and safety.[6] Constitutional recognition of such interests constitutes the normative basis for legislative and judicial protection.

[2] *Garcetti v/s Ceballos*, 547 U.S. 410, 421–22 (2006)
[3] *Guja v/s Moldova* (Grand Chamber), App No 14277/04, 12 February 2008 (ECHR) paras 70–97 https://hudoc.echr.coe.int/eng?i=001-85016
[4] Constitution of India 1950- Article 19(1)(a) https://indiankanoon.org/doc/1142233/
[5] *Pickering v Board of Education*, 391 U.S. 563 (1968) https://supreme.justia.com/cases/federal/us/391/563/
[6] *Maneka Gandhi v Union of India* (1978) 1 SCC 248, 264–68 https://indiankanoon.org/doc/1766147/

Whistleblowing as balancing public interest and confidentiality

Whistleblowing raises tensions between confidentiality obligations (especially for public servants) and the overriding public interest in disclosure. The ECHR in *Guja v/s Moldova* held that a civil servant's dismissal for leaking prosecutorial letters violated Article 10, laying down a six-factor test for balancing confidentiality and public interest.[7] Similarly, the US Supreme Court in *Pickering v/s Board of Education* recognised the need to balance the employee's right to speak on matters of public concern with the government's interest in efficient service.[8]

Statutory necessity

While the constitutional principles frame the broad normative structure, they rarely offer workable remedies for retaliation. For this reason, statutory protection becomes central. The United States has somewhat of a patchwork set of laws applying to the various sectors in question (WPA, SOX, Dodd-Frank, False Claims Act). The EU has taken the route of harmonisation under the 2019 Whistleblower Directive. India has passed the Whistleblowers Protection Act 2014, but it has yet to fully operationalise it further, leaving the possibility of whistleblowers being placed at risk.

INDIA: THE WHISTLE BLOWERS PROTECTION ACT, CASE LAW AND IMPLEMENTATION GAPS

Legislative framework

Established with the intent of providing a disclosure avenue for allegations of corruption, wilful abuse of power or criminal offences committed by public servants, India enacted the *Whistle Blowers Protection Act 2014* (WBPA 2014).[9] Section 3 confers a right to make a public-interest disclosure to a "competent authority," while Section 4 prohibits the victimisation of the whistleblower. However, Section 5 requires that the identity of the complainant be disclosed, thus severely limiting anonymous complaints.[10]

Although the Act received Presidential assent in May 2014, the enforcement of the Act lingers due to its pending rule-making process. Press notes from the Government have confirmed that rules are in the pipeline as an Amendment is contemplated to exclude disclosures relating to

[7] *Guja v Moldova* (n 3) paras 70–97
[8] *Pickering v Board of Education* (n 5) 568–70
[9] Whistle Blowers Protection Act 2014, ss 3–5.https://share.google/75ulFaCJhIV5m3y8o
[10] ibid s 5

national security and sovereignty.[11] Thus, being in the statute book, the Act remains in dormancy.

Judicial Interventions And Administrative Measures

Before the enactment of the statute, the Government had earlier passed the *Public Interest Disclosure and Protection of Informers* Resolution 2004, which designated the *Central Vigilance Commission* as the competent authority.[12] The Supreme Court sometimes recognises the importance of safeguarding informers. For instance, in CBI v/s Anupam J Kulkarni, whilst not directly related to whistleblowers, the Court declared the need to protect informers from being exposed in corruption proceedings.[13]

Indian jurisprudence, however, remains fragmented. While the deaths of whistleblowers, including Satyendra Dubey (NHAI engineer) and S. Manjunath (IOC officer), sent waves of public outrage, the response has been rather sporadic and ad hoc. In Dubey's case, a letter that he had sent to the Prime Minister Office was leaked, which ultimately resulted in his death. Manjunath was killed for having sealed a petrol pump that was selling adulterated fuel.[14] The fact that the perpetrators were later convicted under the Indian Penal Code demonstrated how the safety of whistleblowers precariously hangs on how well criminal law is enforced rather than on protective mechanisms.[15]

Doctrinal analysis

The Indian Constitution confers normative support through Article 19(1)(a) and Article 21. In various instances, the courts have expanded the scope of Article 21 and made it inclusive of the right to safety and dignity.[16] That said, without operational statutory machinery, these guarantees are more in the wish list. What makes the WBPA a weak legislative framework for India, by global standards, are its deficiencies viz. absence of anonymous channels, narrow scope and absence of an independent authority.

[11] Press Information Bureau, Government of India, 'Present Status of Whistleblowers Protection Act' https://pib.gov.in/newsite/PrintRelease.aspx?relid=113294
[12] *Government of India, 'Public Interest Disclosure and Protection of Informers Resolution' (Resolution No 371/12/2002-AVD-III, 2004)*
[13] *CBI v Anupam J Kulkarni (1992) 3 SCC 141, 147* https://indiankanoon.org/doc/244622/
[14] *Manoj Mitta, 'The Whistleblower Who Was Betrayed' Times of India* https://timesofindia.indiatimes.com/india/the-whistleblower-who-was-betrayed/articleshow/313675.cms
[15] *State of UP v Shiv Kumar Yadav (2007)* https://www.casemine.com/judgement/in/667e0dcc8bf0246e4a1245b0
[16] *Maneka Gandhi v Union of India (n 7) 264–68* https://indiankanoon.org/doc/1766147/

UNITED STATES: CONSTITUTIONAL LIMITS AND STATUTORY PROTECTIONS.

Constitutional Jurisprudence: Pickering To Garcetti

In the landmark decision in Pickering v/s Board of Education, the US Supreme Court had made a recognition that public employees do not relinquish their First Amendment rights but subject such protection to the balancing test between employee speech on matters of public concern and governmental efficiency.[17] This doctrine was later narrowed in Connick v/s Myers to limit protection to speech of "public concern."[18]

Garcetti, the landmark case, drastically reduced protection by proclaiming that speech "*pursuant to official duties"* has no constitutional protection.[19] Justice Kennedy for the majority reasoned that the claims would constitutionalize every workplace grievance. In dissent, Justice Souter warned that this rule would chill disclosures that are of value.[20]

Contrarywise, the Court in Lane v/s Franks clarified that sworn testimony in judicial proceedings is afforded First Amendment protection, even if related to job duties.[21] Thus, the US Constitutional Law creates an extremely narrow corridor of protection, with whistleblowers left to depend largely on statutory remedies.

The Whistleblower Protection Act And Related Statutes

The Whistleblower Protection Act 1989 (as amended) safeguards federal employees who reveal evidence of illegality, gross waste, or dangers to public health.[22] Enforcement is with OS, and appeals to the MSPB. However, empirical studies witness inconsistent remedies, with the burden of proof falling drastically on the employees.[23] In the private sector, statutes such as SOX safeguard employees of publicly traded companies who have reported corporate fraud.[24] The Dodd–Frank Act of 2010 further established an SEC Whistleblower Program, with whistleblowers entitled to monetary awards ranging from 10 to 30 percent of sanctions where

---

[17] *Pickering v Board of Education 391 US 563, 568–70 (1968)* https://supreme.justia.com/cases/federal/us/391/563/
[18] *Connick v Myers 461 US 138, 146–49 (1983)* https://supreme.justia.com/cases/federal/us/461/138/
[19] *Garcetti v Ceballos 547 US 410, 421–22 (2006)* https://supreme.justia.com/cases/federal/us/547/410/
[20] *ibid 446 (Souter J, dissenting)*
[21] *Lane v Franks 573 US 228, 238–39 (2014)* https://supreme.justia.com/cases/federal/us/573/228/
[22] *Whistleblower Protection Act 1989 (5 USC § 2302(b)(8))* https://www.americorps.gov/sites/default/files/document/2021_08_27_Whistleblower_Rights_Employees_OGC.pdf
[23] *Robert G Vaughn, The Successes and Failures of Whistleblower Laws (Edward Elgar 2012) 65–70*
[24] *Sarbanes–Oxley Act 2002, s 806 (18 USC § 1514A)* https://pcaobus.org/About/History/Documents/PDFs/Sarbanes_Oxley_Act_of_2002.pdf

they have provided original information resulting in enforcement actions. This incentive mechanism has raised billions in recoveries.[25]

In addition, the False Claims Act (qui tam) provisions allow private individuals to sue on behalf of the government for fraud against federal programmes and to share a portion of the recovery, thus incentivising whistleblowing in both healthcare and defence sectors.[26]

Comparative Strengths And Weaknesses

Therefore, US law teaches that though the Constitution may not protect (Garcetti), aggressive statutory schemes with incentives and independent enforcement mechanisms can be the solution; hence, the SEC and OSC. Fragmentation across sectors and procedural hurdles have impaired such protection somewhat.

EUROPEAN UNION: DIRECTIVE 2019/1937 AND STRASBOURG JURISPRUDENCE

The Whistleblower Directive 2019/1937

In 2019, the EU passed Directive (EU) 2019/1937 on the protection of individuals reporting Union law breaches.[27] The Directive must be interpreted to set minimum thresholds of whistleblower protection in Member States. Article 6 makes it the responsibility of Member States to safeguard whistleblowers from retaliation when they act in good faith to report.[28] Article 9 requires establishment of internal and external reporting systems, including electronic reporting channels that guarantee confidentiality.[29] Article 21 makes the duty of Member States to provide legal remedies and assistance measures. The Directive also extends protection beyond employees to cover contractors, suppliers, volunteers, and shareholders.[30] The deadline for transposition was 17 December 2021, but the Commission's 2024 Implementation Report revealed that several Member States missed the deadline or adopted incomplete laws.[31]

---

[25] *Dodd–Frank Wall Street Reform and Consumer Protection Act 2010, s 922-* https://www.sec.gov/files/dodd-frank-sec-922.pdf
[26] *False Claims Act 1863 (31 USC §§ 3729–33)*
[27] *Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019-* https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019L1937#:~:text=(59)%20Persons%20who%20are%20considering,remedy%20the%20problem%2C%20where%20possible
[28] *ibid art 6*
[29] *ibid art 9*
[30] *ibid art 4*
[31] *European Commission, 'Report on the Implementation and Application of Directive (EU) 2019/1937' COM (2024) 269 final, Pg 2* https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52024DC0269

Strasbourg Case Law: Guja V. Moldova And Progeny

The European Court of Human Rights (ECHR) has developed important jurisprudence under Article 10 ECHR. In *Guja v Moldova*, the Grand Chamber held that dismissal of a public servant for disclosing prosecutorial correspondence violated Article 10.[32] The Court set out a *six-part test*: (1) availability of internal channels, (2) public interest in the disclosure, (3) authenticity of the information, (4) good faith of the whistleblower, (5) damage to employer's interests, and (6) severity of sanction imposed.[33] Applying these, the Court concluded that the disclosure served a compelling public interest and protection was warranted.

Subsequent cases, such as *Heinisch v Germany*, extended this reasoning to private-sector employees in healthcare, affirming that dismissal for exposing patient neglect breached Article 10.[34] The jurisprudence thus emphasises proportionality, good faith, and the primacy of public interest.

Implementation Challenges

Despite the Directive and Strasbourg standards, practical protection in the EU remains uneven. The Commission's 2024 Report noted that some Member States restricted coverage to employees, omitted provisions on anonymity, or failed to create independent authorities. Civil society organisations, such as Transparency International EU, have urged more consistent enforcement.[35]

COMPARATIVE THEMES: LESSONS ACROSS JURISDICTIONS

Compared to India, the United States, and the European Union, several pertinent differences surface in the scope of the substance to be considered, in its institutional machinery, and in the secrets to be assured and are as follows:-

[32] *Guja v Moldova (GC) App no 14277/04, ECHR 2008-I, paras 70–97* https://whistleblowingnetwork.org/WIN/media/pdfs/Cases-judgements-opinions-EUR-ECHR-Judgement-Guja-v.Moldova.pdf

[33] *ibid paras 72–97*

[34] *Heinisch v Germany App no 28274/08 (ECtHR, 21 July 2011) paras 62–78* https://whistleblowingnetwork.org/WIN/media/pdfs/Cases-judgements-opinions-EUR-HEINISCH-v-GERMANY.pdf

[35] *European Commission (n 34) 13–15* https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52024DC0269&utm_source=chatgpt.com

Table: Comparative Analysis of Whistleblower Protection Frameworks

Theme	India	United States	European Union
Coverage	Public servants only	Public & private; fragmented	Employees & contractors; minimum standards
Enforcement	Central Vigilance Commission; limited	OSC, MSPB, SEC; monetary awards	Member States' authorities; uneven
Confidentiality	Identity disclosed; deters reporting	Anonymous; strong protection	Secure channels; strict confidentiality
Incentives	Civic duty; no reward	Monetary (10–30% sanctions)	No reward; ethical duty

So we must observe that this comparison shows that the best regimes have a broad substantive coverage, independent enforcement and confidentiality protections. Incentives, though controversial, seem to increase reporting in the US model.

DOCTRINAL TENSIONS: PUBLIC DUTY, SECRECY AND PUBLIC INTEREST

Public Duty Vs. Constitutional Protection

The US stance in Garcetti excludes speech made in the course of official duties, even if disclosures are in the public interest.[36] The ECHR, however, in Guja employs a test of proportionality that is supportive of disclosure where public interest is significant.[37] Indian law has not so far faced this question directly, although Articles 19 and 21 on principle favour protection.

Secrecy And National Security

Governments tend to use national security to limit whistleblowing. India's proposed amendments to WBPA specifically aim to preclude disclosures that impact "sovereignty, security and integrity."[38] In the US, legislation such as the Espionage Act criminalises unauthorised release of classified data, regardless of public interest (reliably illustrated in Edward Snowden debates). Strasbourg has been less dismissive of public interest, demanding

[36] *Garcetti v Ceballos (n 21) 421–22*
[37] *Guja v Moldova (n 35) paras 70–97*
[38] *Press Information Bureau (n 12)*

contextual balancing.[39]

Incentives Vs. Moral Duty

The US model, especially under Dodd-Frank and FCA, best exemplifies the efficiency of monetary incentives in fostering disclosures.[40] European and Indian models present whistleblowing more as a civic responsibility rather than a rewarded activity. This subjects whistleblowing to normative issues of whether it must be incentivised or viewed as an ethical obligation only.

RECOMMENDATIONS AND CONCLUSION

India must promptly operationalise the WBP Act while providing independent oversight and safeguarding the private sector. Reforms must include: (i) the creation of an independent Whistleblower Protection Commission; (ii) safe anonymous reporting systems; (iii) unambiguous protections against reprisals, and (iv) judicially reviewed, strictly specified national-security exclusions. Trust demands strong institutions and assurance of confidentiality, as seen in the case of the USA and the EU. Properly calibrated, incentives could also be applied in high-risk contexts.

Generally, the normative basis comes from Constitutional protection, but effectiveness is a function of institutional design and legislation. India is far from meeting Global norms. The deaths of Dubey, Manjunath, and others will remain tragic reminders of a system that fails individuals who speak the truth unless something is done immediately.

BIBLIOGRAPHY

PRIMARY SOURCES

Legislation & Constitutional Texts-

- Constitution of India 1950.
- Dodd–Frank WSR and CP Act 2010, s 922
- Espionage Act 1917 (18 USC §§ 792–98).
- False Claims Act 1863 (31 USC §§ 3729–33).

[39] *Espionage Act 1917 (18 USC §§ 792–98) r/w Geoffrey Stone, 'Free Speech, National Security, and the Rule of Law' (2017) 84 University of Chicago Law Review 355, 360–62-* *https://www.repository.law.indiana.edu/cgi/viewcontent.cgi?article=1130&context=ilj*

[40] *Dodd–Frank Act 2010, s 922; SEC (n 28) 12–15* *https://www.sec.gov/files/dodd-frank-sec-922.pdf?utm_source=chatgpt.com*

- Sarbanes–Oxley Act 2002, s 806 (18 USC § 1514A)
- Whistleblower Protection Act 1989 (5 USC § 2302(b)(8))
- Directive (EU) 2019/1937 of the European Parliament and of Council of 23 Oct, 2019

Case Law:-

- *CBI v Anupam J Kulkarni* (1992) 3 SCC 141.
- *Connick v Myers* 461 US 138 (1983).
- *Garcetti v Ceballos* 547 US 410 (2006).
- *Guja v Moldova* (GC) App no 14277/04
- *Heinisch v Germany* App no 28274/08
- *Lane v Franks* 573 US 228 (2014).
- *Maneka Gandhi v Union of India* (1978) 1 SCC 248.
- *Pickering v Board of Education* 391 US 563 (1968).
- *State of UP v Shiv Kumar Yadav* (2007)

Government & Institutional Reports:-

- European Commission Report, *(EU) 2019/1937* COM (2024) 269
- Government of India, *PID&PIR* (Resolution No 371/12/2002-AVD-III, 2004).
- Press Information Bureau, Government of India, '*Present Status of Whistleblowers Protection Act'*
- US Securities and Exchange Commission, *Annual Report to Congress on the Dodd-Frank Whistleblower Program*(2023

SECONDARY SOURCES

Books:-

- Robert G Vaughn, *The Successes and Failures of Whistleblower Laws* (Edward Elgar 2012).

Journal Articles/Reports:-

- Geoffrey R Stone, 'Free Speech, National Security, and the Rule of Law' (2017) 84 *University of Chicago Law Review* 355.
- Transparency International EU, 'Whistleblowing in Europe: Unfinished Business' (2024)

News Media:-

- Manoj Mitta, 'The Whistleblower Who Was Betrayed' *Times of India*
- 'Remembering Satyendra Dubey' *The Hindu*
- 'The Manjunath Murder Case' *India Today*