



Partecipazione e Conflitto

<http://siba-ese.unisalento.it/index.php/paco>

ISSN: 1972-7623 (print version)

ISSN: 2035-6609 (electronic version)

PACO, Issue 17(1) 2024: 191-209

DOI: 10.1285/i20356609v17i1p191

Published 15 March, 2024

Work licensed under a Creative Commons Attribution-Non commercial-Share alike 3.0 Italian License

RESEARCH ARTICLE

Strategies for Whistleblowing: How Civil Society Organizations Intervene in the Process of Blowing the Whistle

Alessandra Lo Piccolo

University of Bologna

ABSTRACT: Whistleblowing and collective action have been historically strictly intertwined. However, few works have tried to understand the interrelations between these forms of ethical resistance. The lack of dialogue between these literature strands seems particularly problematic given the contribution of social movement organizations and civil society groups in collecting, articulating, and publicizing the information disclosed by whistleblowers. Whereas Civil Society Organizations (CSOs) constitute crucial whistleblowers' addresses, much remains to be said about how grassroots collective actors strategically intervene in whistleblowing, easing information disclosure, protecting informants, and triggering broader political and social change processes. Focusing on insights from Italy and Spain, the article draws on qualitative interviews, documents, and parliamentary debates to single out three common strategies CSOs adopt to intervene in the whistleblowing process before, during, and after whistleblowers' disclosure: policy input, direct social action, and legal intervention. The article contributes to ongoing discussions in collective action and whistleblowing research, elucidating how CSOs influence the whistleblowing process and discussing their micro- and macro-level consequences.

KEYWORDS: Civil Society Organizations, Collective Action, Social Change, Strategies, Whistleblowing

CORRESPONDING AUTHOR(S): alessandra.lopiccol2@unibo.it

1. Introduction

Blowing the whistle is generally regarded as a political act of dissent threatening those in power (Farrell and Petersen, 1982; Ramirez, 2007). However, rather than as an event or a single act, whistleblowing is better understood as a *process* (Near and Jensen, 1983; Near and Miceli, 1996), specifically, a political process that turns an employee into a political activist (Uys, 2000). Such a process begins when insiders with "privileged access to data or information of an organization, about non-trivial illegality or other wrongdoing whether

actual, suspected or anticipated" (...) decide to report what they know "to an external entity having potential to rectify the wrongdoing." (Jubb, 1999: 78)¹. Hence, besides informants, the whistleblowing process involves at least two other actors: "wrongdoer(s) who commit the alleged wrongdoing (...) and recipient(s) of the report of wrongdoing"² (Near and Miceli, 1996: 508).

Whereas the whistleblowers' perspective has been extensively investigated (Alford, 2002; Bushnell, 2020; Culiberg and Mihelič, 2017), less is known about other participants of the whistleblowing process. In particular, collective action studies have paid scarce attention to the role of Civil Society Organizations³ (CSOs) as *whistleblowing addressees*⁴ and their role as external entities capable of intervening to rectify the wrongdoing disclosed by whistleblowers (Loyens and Vandekerckhove, 2018; Ceva and Bocchiola, 2020). Yet, this gap seems particularly problematic given the increasing contribution of social movements, investigative journalism, and civil society organizations in collecting, articulating, and publicizing the information disclosed by whistleblowers (De Maria, 2008a; Kenny and Bushnell, 2020; Olesen, 2022a).

According to the National Whistleblowing Center, CSOs play an essential role in the whistleblowing process, "serving as intermediaries for whistleblowers who wish to remain anonymous, by educating whistleblowers about the strongest existing whistleblower laws, and advocating for stronger whistleblower laws around the world."⁵ Notwithstanding the emergence of dedicated NGOs and international networks working on whistleblowers' rights and protection, studies on collective action and whistleblowing have seldom crossed their paths. To fill this gap, the article focuses on CSOs as addressees of *external whistleblowing* (Dworkin and Baucus, 1998; Miceli et al., 2014) and contributes to debates on the interaction between individual and collective forms of "ethical resistance" (De Maria, 2008). In particular, it examines how CSOs strategically intervene to societalize whistleblowers' claims (Olesen, 2021; Park and Lewis, 2019) and critically reflects on their micro- and macro-level consequences. Building on insights from the Italian and Spanish cases, the analysis discusses three crosscutting strategies deployed by CSOs who mobilize on whistleblowing and whistleblowers' rights – *policy input*, *direct social action*, and *legal intervention*. It concludes that CSOs can i) facilitate the whistleblowing process by advocating for policy change and intervening in the whistleblowing regulation (*before*), ii) ameliorate the whistleblowing process by supporting informants in their reporting journey (*during*), and iii) amplify whistleblowers' voices across diverse arenas, strengthening the consequences of their disclosure acts (*after*).

The following section discusses the relationship between whistleblowing and collective action, situating the study in the broader debate on strategic approaches to collective action. The third section introduces the cases, data, and methods. The fourth section describes the three overarching strategies building on examples from the Italian and Spanish cases. The discussion and conclusion critically reflect on the sociological implications of deepening our understanding of the interactions between CSOs and whistleblowers, discussing the study's contributions and limitations, and suggesting new avenues for future research.

¹ Similarly, Near and Miceli defined whistleblowing as "the disclosure by organization members (former or current) of illegal, immoral, or illegitimate practices under the control of their employers, to persons or organizations that may be able to effect action" (Near and Miceli, 1985:4).

² Also known as the *object*, the *agent*, and the *addressee*² (Ceva and Bocchiola, 2020).

³ The label 'civil society organizations' here encompasses non-state and non-market actors, such as civic associations, NGOs, and social movements.

⁴ As maintained by Olesen, "disclosures are mostly made to actors and organizations that share and professionally defend an ethos of democratically oriented field transgression, primarily investigative journalists and political activists" (Olesen, 2019: 280).

⁵ National Whistleblowing Center: <https://www.whistleblowers.org/how-non-governmental-organizations-can-help-whistleblowers-around-the-world/>

2. Whistleblowing and collective action: a strategic approach

Disclosing information on potential wrongdoings, whistleblowers break the hidden deals that sustain political corruption, reaffirm the values of social justice and political accountability (Lewis et al., 2014; Santoro and Kumar, 2018), and nurture citizens' sense of efficacy and belief in shared moral norms (Rosanvallon, 2008). Over the years, prominent figures such as Chelsea Manning, Christopher Wylie, and Edward Snowden have embodied the democratic potential of whistleblowing as an increasingly routinized political repertoire (Olesen, 2019). However, the consequences of whistleblowing hardly depend on informants as isolated actors but rather derive from their interaction with an array of actors and arenas, among which one can find a multiplicity of internal and external, institutional and non-institutional addresses. In fact, one can imagine whistleblowing effects varying in nature and intensity depending on the external entity receiving their reports and its capacity to correct the exposed wrongdoing. When targeting regulatory agencies or enforcement actors, whistleblowers may set in motion investigations and trials, leading to formal sanctions (Mainwaring, 2003). When endorsed by political entrepreneurs, their disclosure may inform policy and political change. When media outlets reinforce their information, they may spark political scandals, resulting in informal sanctions (Peruzzotti and Smulovitz, 2006). Finally, when aligned with CSOs' claims, their denunciation may be a source of moral sanctioning, trigger broader protest movements, induce political change, or reinvigorate contentious action (Bernstein and Jasper, 1996; De Maria, 2008).

Existing studies on whistleblowing and collective action have attempted to single out the similarities and differences between these *interconnected strategies of ethical resistance* (De Maria, 2008). Both are rooted in similar historical processes, which started to crystallize around the 1960s and 1970s, when bottom-up forms of oversight over the democratic realm became increasingly salient (Keane, 2009; Olesen, 2019, 2021, 2022a; Rosanvallon, 2008). Whistleblowers and activists, as well as journalists, have thus emerged as prototypical cases of *field transgressors* who violate the autonomy principle of democratic systems by exposing information against the will of those "owning" it (e.g., state authorities, employers, etc., Olesen, 2019, 2021). Hence, whistleblowing and collective action are not mutually exclusive but contiguous strategies, rooted in identity and group morals, alternatively directed to internal targets or external audiences but characterized by different strategic options and tactical repertoires (Bernstein and Jasper, 1996; De Maria, 2008; Jasper, 1997). This micro-meso level continuum increases the possibility for external whistleblowers to be heard and influential (Kenny and Bushnell, 2020) while lending credibility and strength to collective actors (Bernstein and Jasper, 1996; De Maria, 2008). At the micro-level, whistleblowers' biographical trajectories connect individual and collective action, turning insiders into activists and public figures (Jasper, 1997; Uys, 2000). At the meso-level, whistleblowers' reporting impacts collective claim-making, functioning as a catalyst for collective struggles (Bernstein and Jasper, 1996; Lee, 2022), while collective actors furnish informants with support, career opportunities, and channels to voice their claims (Jasper, 1997). However, few have reflected on the macro-level consequences of the interaction between whistleblowing and collective action, that is, on the consequences that CSOs' mobilization around whistleblowing can have on broader processes of political, social, and cultural change (Bushnell, 2020), and how these changes may impact the experience of whistleblowers at the micro-level.

So far, the scholarship on whistleblowing has devoted much attention to investigating whistleblowers' strategies to understand *when, why, and how* individuals blow the whistle (Cho and Song, 2015; Culiberg and Mihelič, 2017b; Dungan et al., 2019; Park and Lewis, 2019) or on institutional and company strategies to incentivize whistleblowing (B. Berry, 2004; Chen et al., 2017; Howse and Daniels, 1995). Social movement scholars have tangentially entered this debate (Jasper, 1997). In particular, the strategic interaction approach has looked at whistleblowers' trajectories as a result of strategic action, for example, describing whistleblowers'

decisions to shift from internal to external disclosure channels, i.e., going public by contacting protest movements (Jasper, 1997), as a strategic reaction to the dismissing or threatening response of internal addresses (Jasper, 2006).

However, scholars have seldom investigated how CSOs *seek to intervene in the whistleblowing process strategically* and the consequences that these interventions can have for whistleblowers at the micro-level and the whistleblowing process at the macro-level (Bernstein and Jasper, 1996; De Maria, 2008; Jasper, 1997). Such a gap is not banal, given the increasing attention around whistleblowing as a transformative form of political participation (Kenny and Bushnell, 2020; Olesen, 2022a) and the influence of whistleblowing on pro-accountability and anti-corruption struggles (Gao and Brink, 2017; Martin, 2009; Schultz and Harutyunyan, 2015; Su and Ni, 2018).

Change-oriented collective actors tend to strategize their actions to reach their goals, exploiting their means, taking advantage of contextual opportunities, and trying to overcome eventual constraints (McAdam and Fligstein, 2011; Fligstein, 2008). Strategic action is an actor's attempt at obtaining political, cultural, or social change by changing one's beliefs, feelings, or actions (Jasper, 2006; Jasper et al., 2015). Strategic approaches to collective action have elucidated why and how actors select specific strategies (Jasper, 2006; Meyer and Staggenborg, 2012; Stevenson and Greenberg, 2000), what are the functions of strategic action (King and Walker, 2014; Zald, 1996), and their consequences⁶ (Amenta, Halfmann, and Young 1999; Basseches 2019; Elliott-Negri et al. 2021; Jasper et al., 2022; King 2008).

CSOs' intervention may materialize at different phases, i.e., before, during, and after whistleblowers' disclosure. Before, CSOs may improve the conditions that foster information disclosure, e.g., advocating for the passage of ad hoc legislation or orchestrating campaigns to raise public awareness around whistleblowers' protection. During the process, CSOs may act as external addresses, supplying whistleblowers with secure channels to file their reports, creating services to support whistleblowers during their disclosure process, furnishing them with information on how to act, and even connecting them with institutional addresses. Finally, after the information has been disclosed, CSOs may bolster the impact of whistleblowers' disclosure, strengthening their voices, triggering direct by the authorities, and administering indirect sanctions by building on whistleblowers' information.

The following sections elaborate on common strategies in the Italian and Spanish cases. In particular, the article discusses how CSOs may strategically intervene to ease information disclosure by advocating for policy change, how they can ameliorate whistleblowers' experiences recurring to direct social action supporting them during their reporting journey, and how they can magnify the impact of whistleblowers' information by restoring to institutional and non-institutional means, having different consequences at different stages and for different purposes.

3. Methods and Data

The paper draws on empirical evidence from Italy and Spain, representing two different contexts in which CSOs have extensively intervened in the whistleblowing process. In both countries, mobilizations around whistleblowing and whistleblowers' rights started around the early 2010s, when attention to the topic surged worldwide. In both cases, CSOs mobilized in a context of systemic corruption, characterized by high levels of perceived impunity and cultural hostility towards whistleblowers.

⁶ The study elucidates the strategies through which CSOs intervene in whistleblowing, leaving the issue of selection and outcomes of strategies to future work.

In Italy, the mobilization around whistleblowing started as a policy campaign, first initiated by Transparency International Italy (TI-It) in 2009, but the policy process started only in 2013, after the remarkable electoral success of the 5 Star Movement (5SM). The same year, TI-It and the 5SM drafted and presented the first version of a Whistleblowers' Protection Act to the Parliament. After three years of deadlock, the process accelerated at the end of 2016, when TI-It invited another CSO, Riparte il Futuro (RIF), to launch the campaign *#VoicesofJustice*. Relevant institutional figures, such as the National Anti-corruption Authority (ANAC) President, endorsed the campaign and worked as insiders to pressure the bill's approval. After eight years of mobilization, the bill was approved in 2017⁷. However, the law left some of CSOs' requests unattended. New actors, such as the tech organization Hermes Centered for Transparency and Digital Human Rights (HC) and the anti-mafia movement Libera, joined TI-It and created whistleblowers-oriented services, *ALAC* and *Linea Libera*, to support informants and influence the law's implementation. TI-It and HC moved even a step forward by developing a whistleblowing platform for public administrations (PAs), *WhistleblowingPA*.

In Spain, whistleblowing became a central theme in 2012 when Social Movement Organizations (SMOs) that animated the *15M/Indignagos* movement in 2011 started to receive anonymous leaks denouncing corruption and institutional wrongdoing. Collecting information from whistleblowers, groups such as X-Net built the *15MpaRato* campaign, a popular lawsuit against apical figures of the Spanish political and financial elites, such as Rodrigo Rato, former director of the IMF, Minister of the Economy, vice president of the Spanish government, and President of Caja Madrid - then Bankia⁸. Whistleblowing became a policy issue a few years later when the center and right-wing parties Ciudadanos and Vox tried to pass a bill on whistleblowers' protection. At this point, CSOs the policy debate and tried participating in the national legislative process, influencing the European Directive⁹ on whistleblowing and its transposition by working in coalition and opening institutional whistleblowing platforms in cooperation with local and regional authorities.

Moving from this background, the article reconstructs the main strategies through which CSOs in the two countries have strategically intervened in the whistleblowing process. The empirical material includes 16 semi-structured interviews collected for a broader research project. The selection process has followed a realist criterion, sampling CSOs active in three pro-whistleblowing campaigns that animated the Italian and Spanish civic fields over the last years: *#VoicesofJustice* in Italy (2016-2017, TI-It and RIF), *15MpaRato* (2012-2020, X-Net), and *ABRE* (2020-2023, Hay Derecho, FIBGAR, Corruptil) in Spain. Additionally, the sampling strategy included actors that got involved in the whistleblowing process beyond the legislative arena, including CSOs who participated in setting up whistleblowing services as the tech actor HC and Libera in Italy, and spokespersons from regulatory agencies such as ANAC in Italy, Barcelona's municipality, and the Antifraud Authority of Valencia in Spain.

The empirics include 11 interviews with CSOs mobilizing in whistleblowing campaigns and services, 4 with representatives of whistleblowing regulatory agencies regulating the protection of whistleblowers at the national (ANAC, Italy) and local level (Valencia Antifraud Agency and Barcelona Good Governance and Transparency Office), and 1 with the MP sponsoring the Italian whistleblowers' protection bill. Tab 1 offers a more detailed overview of the research participants. The interviews were collected online and in person between January 2020 and October 2022, lasting 45 to 120 minutes. Interviews have been transcribed, coded, and analyzed in MaxQDA. Codes have been elaborated according to the Thematic Analysis approach, used in its lighter code-book version (Braun and Clarke, 2019), thus looking for strategies as emerging themes. The

⁷ l. 179/2017

⁸ Bankia's bailout contributed to set in motion the crisis of the Spanish economy.

⁹ Directive 2019/1937.

interview material has been triangulated with information from CSOs' blog posts¹⁰ and press releases¹¹, transcriptions of parliamentary debates, and drafts of policy proposals¹². The documents have been retrieved directly from CSOs' websites, accessed through Way Back Machine when necessary, and parliamentary portals.

Table 1. Interviewees per country, organization, and role¹³

1	Italy	Libera, spokesperson for the anti-corruption sector
2	Italy	TI-It, spokesperson for the whistleblowing sector
3	Italy	TI-It, former executive director
4	Italy	RIF, former campaigner
5	Italy	HC, co-founder
6	Italy	SSM, MP
7	Italy	ANAC, former board member
8	Italy	Linea Libera, executive director
9	Spain	Corruptil, spokesperson
10	Spain	Hay Derecho, spokesperson
11	Spain	FIBGAR, spokesperson
12	Spain	X-Net, spokesperson
13	Spain	TI-Sp, spokesperson
14	Spain	Valencia Antifraud Authority, President
15	Spain	Valencia Antifraud Authority, responsible for the whistleblowing sector
16	Spain	Barcelona Good Governance and Transparency Office, spokesperson

4. Strategies for Whistleblowing

4.1 Policy Input

One of the common ways through which collective actors may trigger social change is via policy change. The literature on the *policy* consequences of collective action is probably among this subfield's more extended research areas (Amenta et al., 2010, 2018; Bosi et al., 2016; Bosi and Uba, 2021). Studies on social movements, NGOs, and civil society have indeed shed light on the ways through which grassroots actors that are external to the institutional realm influence the policy process (Amenta et al., 2018; Andrews and Edwards, 2004;

¹⁰ Available at [15MPARATO](#), [X-Net](#), [FIBGAR](#), [The Good Lobby Italia](#)

¹¹ Available at [Riparte il futuro](#), [Transparency International Italia](#)

¹² Available at [Italy- Chamber of Deputies](#), [Senate](#); [Spain- Congreso de los Diputados](#)

¹³ Interviewees 9 and 16 requested not to report the conversation *verbatim*. Information provided in the interviews are thus included in the narrative but not supported via direct quotes.

Burstein, 1999, 2020; Giugni, 2007; Uba, 2009). Studies have thus unpacked the influence of collective action over different policymaking stages, such as agenda-setting, the definition of policy contents, policy passage, and implementation (Amenta et al., 2010).

However, besides advocating for laws' approval through lobbying or mobilization strategies, collective actors may decide to engage more directly in the policy process by *drafting public policies* (Mattoni and Odilla, 2021). In the case of whistleblowing, CSOs both in Italy and Spain have drafted bills from below, resorting to a *policy input strategy*.

The selection of the policy input strategy depends on CSOs' goals, control of specific resources (e.g., internal competencies to draft a bill), and norms regulating citizens' participation in policymaking (i.e., political contexts providing citizens with spaces for policy initiatives). However, when possible, CSOs' intervention at such an earlier stage¹⁴ of the policy process can increase the chances of setting the agenda, imposing specific definitions in the public and institutional discourse, and creating institutional synergies that will serve at later stages to pass a bill.

In the Italian case, the policy input strategy was crucial to passing the national law protecting whistleblowers in 2017. Here, the mobilization around whistleblowing started with the action of Transparency International Italy (TI-It) in 2009. However, the possibility of entering the policy arena materialized only in 2013, after the electoral success of the populist 5 Stars Movement (5SM). The party, which had heavily campaigned on anti-corruption topics, asked TI-It to draft a bill to protect whistleblowers. As maintained by TI-It's spokespersons, the group provided a first draft of the bill that was then re-elaborated by the party to make it more adherent to its political identity and broader discourse.

The 5 Stars arrived! And they, being a non-traditional party, but more than a non-traditional party, were made of people trained differently or not trained at all. They had done a particular thing when they were elected. They were common people, many were common people, and they said, 'You know what? I come from the world of associations; I'll start talking to some associations and ask them what they do (...) She (i.e., the MP who sponsored the bill) asks us to write it, then oh well, they rehash it a bit, they add things a bit more thrust as it represents a bit of the party... but the starting point, the structure is ours 2

For the MP sponsoring the bill, the cooperation with TI-It represented both the expression of ideological proximity to the work and position of CSOs and an instrument to increase the legitimacy of a particular policy demand vis-à-vis her party and its electoral constituency. At the same time, the policy input strategy served to set the agenda and socialized political representatives to a theme utterly new to the Italian political debate. As recalled by the MP who sponsored the bill, the policy ideas offered by TI-It were crucial to shed light on a topic that otherwise would have remained alien to the parliamentary arena. The bill's contents, of course, were in line with the party's ideological standpoints, but whistleblowing was almost unknown to many of its deputies:

Back then, I was representing the movement (i.e., 5SM), and I knew all too well the themes it was pushing for, and there was the fight against corruption, okay, but as a principle. ... They (i.e., TI-It) told me about prevention and whistleblowing. I didn't know anything about whistleblowing; I didn't know what we were talking about (...) I said, "Guys, I want to try; now I'm up here available; let's try." But no, no, I didn't know what whistleblowing was before them before I met Transparency, 6

Once the bill entered the Parliament, the policy input strategy eased the process of influencing its contents and approval. However, TI-It and the 5SM needed the support of other political forces. At this

¹⁴ The policy input strategy can counter the risk of other interest groups (e.g., professional lobbyists) and curtail the options for policy interventions and their role in pre-shaping the agenda-setting stage (J. M. Berry, 1999).

point, TI-It launched the campaign *#VoicesofJustice* with Riparte il Futuro (RIF, nowadays The Good Lobby Italia). RIF was a CSO born out of the anti-mafia movement Libera and brought its advocacy-oriented strategies and parliamentary connections into the whistleblowing campaign. Building on TI-It's policy input strategy eased RIF's lobbying work and increased CSOs' influence over the policy contents. With traditional strategies such as lobbying, the policy input strategy helped shape the bill, building on TI-It's work and proposing new amendments to supportive MPs. One of RIF's campaigners recalled writing *for* MPs as a strategic choice. To magnify their influence, RIF did not write a new text from scratch but worked on prosing and writing MPs' amendments:

We saw this draft by a Congresswoman. We took this proposal and got together with Transparency (...) We had to create the strategy, so the first part of the strategy was what do you want to achieve? Are you okay with this law? No, of course not. The first part was "1. dear parliamentarians, pass a law, 2. the law should have these characteristics" without us writing a text of the law (...) The most internal work of institutional lobbying was on the amendments because (...) amendments have to be studied quickly, in perspective, understood, commented on, and acted upon immediately. (...) We proposed our amendments that PD and 5SM took up, and finally, the law was passed with a plebiscite majority. 4

However, obtaining policy change is not necessarily the first goal that CSOs pursue. In contrast, intervening in the policy domain can sometimes appear as the least attractive option until other strategies prove successful. The Spanish case demonstrates such a dynamic. Here, the mobilization on whistleblowing started as a grassroots campaign, *15MpaRato*, a grassroots lawsuit built on whistleblowers' leaks to sanction the countries' corrupt elites (section 4.3). Thus, at its outset, the mobilization around whistleblowing was not framed as a policy issue but as a sanctioning action to compensate for the lax attitude of institutional actors in the anti-corruption struggle:

Corruption will only end with the proactive, continuous, and definitive control of the citizenry over institutions and parties. It will never come as a spontaneous generation from within. 11, *El Confidencial*, [26.06.2015](#)

However, after the first court successes, activists from *15MpaRato* and its leading organization, X-Net, understood it was time to change strategy and enter the parliamentary arena. The decision to opt for a policy input strategy emerged as a reaction to the increasing interests of emerging populist parties in whistleblowing and whistleblowers' rights. In particular, X-Net decided to elaborate its policy proposal to counter a bill presented by the center-right populist party Ciudadanos, the first proposal on whistleblowing presented to the Spanish Parliament in 2015. At this point, X-Net drafted a bill and searched for 15 MPs to sponsor it in the parliamentary arena. This strategy mirrored X-Net's understanding of the democratic process, where civil society is considered the engine of the policy cycle, with MPs and institutions regarded as means to translate the general will into actual policies. Here, the policy input strategy served to pressure political representatives and enhance the standards of the policy discussion and was quickly replicated by less radical CSOs interested in intervening in the whistleblowing process, such as *Corruptil*, a small organization mainly composed of lawyers, judges, and anti-corruption practitioners. As maintained by *Corruptil*'s spokesperson, for these groups, the policy input strategy represented a more effective compared to large mobilizations:

Well, since many of us are lawyers, we can draft laws in a way that almost no one can do (...) So, we have a much greater impact working with 17 people than with 17,000. In the end, we ended up in this little group, okay? Of course, in the end, politicians and the media already know we are here. 9

Finally, the policy input strategy can also represent a way for CSOs to give their constituencies a voice. In the whistleblowing case, working with informants and starting from their reporting experience became a way to incorporate whistleblowers' concerns into the policy process. For example, this was the case with Hay Derecho, an NGO working on the rule of law in Spain. Here, the policy input to translate the EU Directive into the Spanish legislation came together with a vaster project that aimed at giving voice and visibility to whistleblowers, as reported by one of Hay Derecho's members:

We interviewed whistleblowers and asked them what they need, then we wrote some conclusions, some recommendations, saying a little about the points that should be more careful when transposing or how it should be transposed, what we think should be done. 10

Indeed, in Spain, as in Italy, the approval of the European Directive on whistleblowing in 2019 furnished CSOs with new opportunities to give their input to the policy process. As recalled by FIBGAR's spokesperson:

Since the Directive exists, there has been a debate among the different organizations that work against corruption in Spain. What do we do? Do we support a Comprehensive Law against corruption, or do we focus on the transposition of the Directive on the protection of whistleblowers?.11

Whereas some Spanish CSOs drafted a full-fledged policy proposal, others used institutional venues such as government consultations or the Open Government Forum to voice their opinions and suggest amendments. In both cases, as in Italy, the policy input strategy served to ease participation in the policymaking arena, serving as a starting point to amend the national legislation and improve conditions for whistleblowers and whistleblowing.

4.2 Direct Social Action

In the absence of or parallel to the policy path, CSOs can intervene in the whistleblowing process by utilizing Direct Social Actions (DSA). DSA includes all those "forms of action that focus upon directly transforming some specific aspects of society by means of the very action itself, instead of claiming something from the state or other power holders" (Bosi and Zamponi, 2015:367). In the case of whistleblowing, this form of intervention applies to every action directly aimed at protecting informants and acting upon their reports without claiming the state's intervention. For example, in Italy and Spain, non-institutional protection of informants has been obtained by setting up whistleblowing platforms and services to collect information on corruption and institutional misbehavior cases, granting high standards of safety and anonymity.

In Italy, TI-It and HC set up an encrypted platform to receive whistleblowers' leaks (ALAC) before the national law on whistleblowing was passed. Once the law came into force, the platform did not lose significance but served to cover all those grey areas not included in the law through direct social action. At the same time, ALAC service was complemented by the initiative of other CSOs, such as Libera Libera by Libera, which opened similar support services for potential whistleblowers. Through their services - ALAC and Linea Libera- TI-It and Libera support whistleblowers by furnishing information on the process and its risks, helping them to strategize their actions and select the appropriate targets and means to disclose their information. By doing so, CSOs enhance the quality of whistleblowers' reports and the chances that institutional and extra-institutional whistleblowing channels will act on their leaks. In addition, these services broaden the scope of the law, offering support to all those citizens who would not receive any protection given the impossibility of granting them a whistleblower status.

ALAC is aimed at both whistleblowers and citizens because the aim is to tell them what their rights and options are. Then, if we are also able, we take charge of their reports and carry them out, but the first thing is to assist them (...) the primary purpose is: the citizen does not know what to do, she calls us, we tell her what to do.

Then, from there, there may be 1000 options. One can be, "Look, what you have is very dangerous; you do not have many elements, give up," or "What you have is very good, but if you carry it forward, they catch you immediately, you are immediately identified, let's try to carry it forward. Let's try to fix it a little (...). ALAC aimed at this, assisting people without assistance. 2

More importantly, by interacting with informants, CSOs take care of all the human and psychological aspects excluded from institutional protection, recognizing that supporting whistleblowers entails upholding concrete human beings through their reporting journey. Libera's spokesperson affirmed that this fills a crucial void in the institutional system of whistleblowers' protection. Linea Libera, powered by Libera, thus recognizes the difference between whistleblowing as a process and whistleblowers as individuals, seeking to complement institutional guarantees and help individual informants:

We talk to people who very often tell us, "I've seen this; what should I do? I have a son; I have two children; I cannot sleep at night." (...) There is an endless work that is not only looking at the instrument - the whistleblowing- but looking at the person, the whistleblower, the person who wants to report, who lives a life experience, who makes an effort, who lives super complicated relationships ... then maybe there are those who do not need us and report, but there are people who seek us, who experience suffering and need not be alone.

1

At the same time, these services have become crucial tools to connect whistleblowers with the institutional sector, improving the work of institutional whistleblowing addresses. As affirmed by a former member of the ANAC directive, TI-It's and Libera's work proves essential for the functioning and efficacy of the authority:

It is sufficient to say that if someone is well oriented by Libera or Transparency and sends 30 instead of 3000 pages, the office that carries out the investigation working on 30 pages, not on 3000, so the state saves resources. An investigation of 3000 pages takes weeks, and the investigation of 30 pages takes a few days. 7

The utility of such projects is equally recognized by the Spanish authorities, who set up similar platforms under the CSOs' guidance:

It has been an organization, an NGO, a citizen organization, the one that has created this communication system, easy to install and with all the guarantees (...) the truth is that from us, there is total gratitude because it was not an administration that did this. 14

At the same time, the direct social action strategy can help whistleblowers when institutional actors have proven unhelpful or inaccessible. For example, services such as ALAC collect leaks and pass them to the media to administer non-institutional sanctions. As reported by TI-It's spokesperson, some cases are turned to the media when:

They are very advanced, so they have already undergone a process, and they are so advanced that there is no longer a report to carry out, but maybe there is an interest in explaining what happened, or maybe when the report does not have all the information, and it is difficult to find suitable channels. So, it can be interesting to take it to the media; maybe the person wants to expose it to the media, and maybe there aren't many elements yet, but through an investigation, a more in-depth investigation of the media, we can get there. 2

In the Spanish case, this last use of the direct social action strategy represented the primary way to eradicate political corruption from below. By protecting whistleblowers, collecting their information via a dedicated encrypted platform (*Buzon X*), and exposing it, groups such as X-Net aimed at making visible the *trama governing* relationships between economic and political powers in the country.

For years, we have operated our anonymized leak box, which has allowed us to continue uncovering cases of corruption and protect whistleblowers, 11, Roundtable on Whistleblowers Protection, 2017

X-Net used the information from its whistleblowers to obtain non-institutional sanctions against powerholders by supplying the media with information on relevant corruption cases. As a result, X-Net has been able to attract public opinion attention and support through the mainstream media while at the same time increasing its threatening potential vis-à-vis the political elites:

We not only live surrounded by corruption, but we also live surrounded by information. All the elements we need to build a citizen surveillance and control network against corruption are there; all that is needed is the correct channel to reach the specialists who know how to use it to act, both in the media and legally. This channel is the X-Net platform. 11, blogpost, 2020

As recalled by one of X-Net's co-founders, this was the case with 15MpaRato. The amount of evidence collected through grassroots leakers and the magnitude of the political scandal attracted the attention of mainstream media. However, when journalists pressured the organization to disclose their informants' names, X-Net granted its sources absolute anonymity. At the same time, the amount and relevance of the information were so impressive that it served as a bargaining tool. As a result, traditional media had to accept the conditions posed by 15MpaRato to cover the news and access the leaks. As a result, 15MPaRato ended up collaborating with the more influential media outlets of the country, such as *El Mundo*, *El Diario*, *InfoLibre*, *El Pais*, and *20 minutos*, unveiling major corruption scandals while protecting whistleblowers despite the lack of a national law protecting informants.

Finally, the success of X-Net's leaking platform rapidly attracted the attention of institutional actors, particularly in municipalities led by civic parties, as in Barcelona's case. After some negotiations, Barcelona's city council launched the first institutional leaking platform based on the technology developed by X-Net. Once the public authority enforced the whistleblowing tool, the group considered the goals of its direct social action strategy accomplished and went back to its watchdog functions:

We withdrew from the Transparency and Good Governance committee of the Barcelona City Council after having successfully shared our experience for the creation of the *Bústia* in 250 hours of unpaid voluntary work, both technical and conceptual (...) Now we must return to being external elements to fulfill our watchdog function. The institutions must do most of the work because that is where the resources are. Citizen mechanisms should replace the institutions only when the latter are lax in their functions. 11, Blog Post, 2017

4.3 Legal Intervention

Changing policies or offering ad hoc services are not the only ways for collective actors to intervene in the whistleblowing process. Indeed, in many cases, CSOs have reached significant results by resorting to legal means (M. McCann, 2006). In this sense, recurring to the legal system can be seen as a strategy in its own right (Hilson, 2002).

Collective actors can pursue the legal path for different reasons (Boutcher and McCammon, 2019), mainly when legal opportunities exist (De Fazio, 2012). Under the most favorable conditions, thus, when a specific policy already exists, CSOs can use legal means to intervene in legislation implementation and enforcement. Indeed, whereas social movement studies generally consider the influence of grassroots actors to lower after the phase of policy passage (Amenta et al., 2018), CSOs can obtain relevant results in later stages of the policy cycle, for example, through strategic litigations.

The Italian case exemplifies the relevance of such a strategy at the implementation stage. Indeed, in Italy, TI-It and the tech NGOs HC used strategic litigations to enhance whistleblowing procedures and safety standards recurring to legal means. Specifically, once the national law on whistleblowers' protection was enacted, TI-It and HC supplied their software to the National Anti-corruption Authority (ANAC). However, ANAC modified the original code, infringing the group's intellectual property. HC thus decided to file a civil lawsuit against the authority. As reported by HC's spokesperson, the legal strategy represented a way to force the institutional system to comply with the civil society standards of technological implementation, enhancing whistleblowers' safety beyond what the law prescribed. The litigation was solved in 2020 through a bipartisan agreement, with ANAC restoring the original code and complying with HC's standards. Once ANAC adopted TI-It's and HC's technology, PAs nationwide started to do the same:

There was this important interlude with ANAC which turns into having to sue them (...) in one of the claims we ask them to give visibility to the fact that they had violated the copyright and force everyone saying "everyone, stop using our software and use GlobaLeaks" with the same visibility when they released it. It will be cyclopean stuff (...) because now all of them (i.e., public administrations) say, "I use that because if I use that of ANAC, for sure, they won't sanction me," and we will get ANAC sanctioned by the court of Milan and at that point... 5

At the same time, CSOs' legal intervention can lead to relevant gains at the enforcement stage. By providing legal assistance to activists, citizens, and informants, CSOs can obtain gains at the micro-level that, in the long run, might pile up and create new interpretations of existing laws. Whereas this strategy is prevalent in other areas of anti-corruption mobilizations, e.g., access to information and transparency laws, it is also part of the repertoires through which CSOs can enhance whistleblowers' conditions. The Good Lobby Italy's spokesperson (formerly RIF) maintains this is among the strategies the organization uses to ameliorate whistleblowers' protection:

We will assemble a pro-bono lawyer and a civil society organization that wants to bring a case forward. We will do our analysis on the potential systemic impact of this thing, and if there is, we will put in contact with pro-bono lawyers, let's say, right? This is another aspect of achieving change, isn't it? You don't get it by law but by jurisdiction. 4

Alternatively, CSOs can opt for the legal strategy to respond to the absence of a specific policy, both to obtain the protection of certain rights or to set the policy agenda, triggering the policy process. Of course, such a strategy depends on the existence of political and legal conditions that allow the citizenry to take legal initiatives and control specific resources (McCammon and McGrath, 2015). In the Spanish case, these contextual opportunities exist. Through the *acusación popular* instrument, every Spanish citizen is entitled to file a lawsuit in case of crimes related to the public sphere, even if not directly harmed by that crime¹⁵.

Existing legal opportunities represented the basis for the *15MPaRato* initiative, which successfully opened an investigation against Rodrigo Rato and other top figures of Bankia in the aftermath of the bank's bailout. The *acusación* started from a core of activists from various groups involved in the 15M/Indignados protest movement. The link with the Indignados mobilization was recalled already by the initiative's name, roughly translating into *15McomesforRato* or *15MstopsRato*. The group called individual citizens to send helpful

¹⁵ Art. 101, Ley de Enjuiciamiento Criminal.

information and evidence to build up the case. The majority of the necessary evidence came in less than three weeks. Representing 44 small savers who lost their money, 15MpaRato managed to protect the identity and safety of its informants. According to X-Net's spokesperson, who led the campaign, the group became a reference point for the citizenry, regarded as more trustworthy than public institutions. The significant volume of information forced X-Net to open its first reporting platform – *X-Net Leaks*- to keep track of all the evidence related to Rato's case and to give voices to many other instances of political corruption. Later, the group started cooperating with the Italian HC, using its open-source software for its platform. A spontaneous leak also initiated X-Net's second significant legal action, the *Black Cards* case. This time, the leak was filed to the anti-corruption commission of the *X Party*, the political party born out of X-Net to represent the voices of the 15M. This second flow of information focused again on Rato and his involvement in a case of embezzlement for the misuse of Bankia's funds. In 2017, Rato was sentenced to four years. Notwithstanding the absolution of Rato in one of the proceedings (the 15MParato case), the group reclaimed the goals achieved by its strategy, stating that:

It was people from our groups (15MpaRato and Xnet) who not only sent to the press the so-called emails of Blesa where the proof of the black cards can be found but, more importantly, who did the work of ordering and investigating the material so that this information could be found," (...) "It is important to remember this because the media that have benefited from this work (eldiarios) refuses to recognize it. It refuses to recognize that without the organized civil society, it would never have had one of its best exclusives. 11, InfoLibre, 03.10.2018

The 15MPaRato case thus became a new *modus operandi* to intervene in the whistleblowing process, with new cases opening when significant leaks arrived. However, as discussed in section 4.1, 15MpaRato's first gains came with relevant substantial losses in the long run. After recovering the assets of the people represented by the campaign and Rato's conviction, his acquittal in 2018 convinced X-Net to change its strategy. As a result, the group decided to abandon the legal strategy to focus on policy change:

After eight years at the forefront of the judicialization of the Bankia case - after achieving the recovery of 1500 million in Bankia shares, providing the key evidence for the return of 3000 million to savers and provoking the conviction of 64 politicians and bankers and the entry into a prison of 15 of them by uncovering the Black Cards case- we have decided not to appeal the recent acquittal of the initial public offering (...) We must be aware of the situation and continue to seek concrete achievements instead of martyrdom. The criminal route is closed for the moment. We have to focus on the legislative conquests. 11, blogpost, 2020

5. Discussion and Conclusion

The article has tried to single out the strategies through which CSOs intervene in the whistleblowing process. In doing so, it has contributed to a pretty underrated area of research at the intersection of whistleblowing and collective action studies. In particular, it has focused on the strategies followed by a specific type of whistleblowing external addressee (Ceva and Bocchiola, 2020; Chiasson et al., 1995; Loyens and Vandekerckhove, 2018), namely Civil Society Organizations. Building on previous studies (Bernstein and Jasper, 1996; Bushnell, 2020; De Maria, 2008; Jasper, 1997), the article has put CSOs' strategic choices at the forefront of analysis (Fligstein and McAdam, 2011; Jasper, 2006; King and Walker, 2014). Such a perspective has allowed focusing on the agency of collective actors not just as passive recipients of whistleblowers' leaks but as active and goal-oriented players able to intervene to protect informants, increasing the likelihood of information disclosure by changing contextual conditions and fostering broader pro-democratic and anti-corruption agendas.

The analysis of insights from the Spanish and Italian cases has contributed to ongoing debates aimed at understanding how solo (whistleblowing) and collective (mobilization) strategies of ethical resistance interact

(De Maria, 2008). In particular, it has tried to shed light on how collective actors such as CSOs strategically intervene in the whistleblowing process, positing that these interventions impact the before, during, and after whistleblowers' disclosure.

Insights from the Italian and Spanish cases show that CSOs' engagement in the policy arena through the policy input strategy can be particularly relevant for putting the topic of whistleblowing on the political agenda, socializing the general public and political representatives to its regulation, and underlying its democratic relevance. Such functions appear critical in contexts like Italy and Spain, whose legislative cultures differ significantly from those in Anglo-Saxon countries where whistleblowing tools originated. Here, CSOs' *policy inputs* have thus been crucial to adapting the instrument of whistleblowing to national contexts, making it more resonant with local discourses, for example, connecting it to the anti-corruption narrative of TI-It and the 5SM in Italy and the pro-democratic stances of the 15M/Indignados in Spain. CSOs' influence over the policy process has contributed not only to passing whistleblowers' protection laws, as in the Italian case, but also to changing the cultural understanding of whistleblowers, e.g., countering anti-democratic narratives sponsored by parties such as Ciudadanos in Spain. Before individual disclosure, CSOs can thus act as crucial mediators in contextualizing the whistleblowing concept, easing its popularization inside and outside institutional arenas, and incorporating whistleblowers' voices and needs in the policy debate. Such evidence goes beyond whistleblowing and could contribute to bridging debates on collective action's political and cultural consequences by looking at the link between policymaking and policy ideas (Amenta and Chen, 2023).

During the whistleblowing process, CSOs can mediate the relationship between whistleblowers and other arenas by assisting and guiding whistleblowers in reporting acts via *direct social action* without resorting to state intervention. As seen in the Italian case, such a strategy can be of utmost importance at the micro-level, ensuring psychological assistance to individuals who decide to speak up against wrongdoings and who face significant risks and psychological distress. Unlike matters of identity protection, retaliation, or asset recovery, the psychological condition and needs of whistleblowers have seldom been discussed. Insights from the Italian case could open a new line of research on the role of addresses on whistleblowers' well-being and experiences, as well as inform collective action studies on the biographical consequences of movements and civil society mobilization not only for activists but also for their constituencies and bystanders (Mansbridge and Flaster, 2007). Besides the psychological dimension, direct social action through ad hoc services and platforms allows CSOs to extend their support to those grey areas not covered by whistleblowers' laws. At the macro level, CSOs support a plethora of diverse subjectivities who would not be typically recognized as whistleblowers by institutional actors (e.g., citizens not related to the organization they are reporting about by any form of work contract), de facto broadens the legalistic definition of whistleblowers. Moreover, CSOs serve as reliable sources of information for whistleblowers, improving the accuracy and effectiveness of their reports, facilitating the work of institutions, and increasing the likelihood of significant information being disclosed. Additionally, CSOs play a vital role in connecting whistleblowers to other non-institutional entities, such as the media, increasing the chances of exerting informal sanctions, such as public condemnation, or triggering state agencies to investigate alleged wrongdoing further.

Finally, after whistleblowers have disclosed their information, CSOs can strategically use *legal interventions* to magnify the consequences deriving from their reports. At the micro-level, this can help victims of institutional wrongdoing, as demonstrated by 15MpaRato's success in recovering the money of Bankia's small investors after its bailout. As demonstrated by the Spanish case, legal interventions can set in motion significant processes of political change at the macro-level and lead to procedural amelioration of the whistleblowing regulations. This evidence sheds new light on the interrelated legal and political consequences of collective action (Bosi, 2016; Butcher and McCammon, 2019; M. W. McCann, 1991) and the positive effects of

interactions between cognate forms of boundary transgression as whistleblowing and activism (Olesen, 2021, 2022b).

Beyond delineating the relevance of these strategies for whistleblowing, the study has also shown that well-investigated grassroots strategies, such as intervening in the policy process, utilizing direct social action, and resorting to legal intervention also apply to whistleblowing mobilizations (Amenta et al., 2018; Bosi and Zamponi, 2015, 2020; Mattoni and Odilla, 2021; McCammon and McGrath, 2015; M. W. McCann, 1991). Of course, the strategies discussed in this work represent only a reduced sample of the various alternatives CSOs can select to intervene in the whistleblowing process. For example, the discussion of the direct social action strategy has pointed to the role played by media and mediatization processes to strengthen the influence of whistleblowers' information. Understanding why, how, and when CSOs serve as mediators with the alternative or mainstream media could represent another relevant area for research. Such a mediation role appears even more critical when considering CSOs' role in connecting informants to institutional actors. More research is undoubtedly needed, considering CSOs' calls for being recognized as legitimate whistleblowing actors in various contexts, as the European Directive on Whistleblowing maintains. Considering also the relevant support offered by CSOs at the human and psychological level, it appears that grassroots organizations could and should play a critical role in whistleblowing, covering all those grey areas and aspects that laws and institutions alone cannot protect.

Similarly, collective mobilization and protesting emerged as unspoken elements in the relationship between whistleblowing and collective action. Both in Spain and Italy, campaigns by CSOs on whistleblowers' leaks (15MpaRato) or for whistleblowers' rights (VoicesofJustice) have significantly helped to magnify the effects of whistleblowers' information and ameliorate the whistleblowing conditions. Overall, the connections between policy, legal, and direct action strategies with more traditional repertoires of action, such as protests, petitions, etc., represent a promising area of research, which could offer new evidence on the interrelatedness of grassroots effects in the whistleblowing field (Bosi, 2016).

Finally, the article offers a tentative and descriptive account of CSOs' strategies to intervene in whistleblowing. Of course, this represents a starting point for more detailed, context-specific, dynamic, and interactionist investigations on the theme. As maintained by the strategic interaction perspective (King and Jasper, 2022), more attention should be devoted to the interactions between individual and compound players in whistleblowing's various arenas. Each of the strategies presented could be further unpacked to break down the process of intervening in whistleblowing in a series of interaction sequences among a multitude of players (Elliott-Negri et al., 2021; Jabola-Carolus et al., 2020; Jasper et al., 2022).

A more fine-grained look at how specific grassroots actors interact with specific institutional addresses in courts or administrative arenas would shed light on the consequences of these strategies. Similarly, looking more closely at the interactions between pro-whistleblowing CSOs and political players in the local, national, or international arena could furnish additional information on whistleblowers' legislations and processes of policy change more generally.

References

- Alford, C. F. (2002). *Whistleblowers: Broken lives and organizational power*. Cornell University Press.
- Amenta, E., Andrews, K. T., and Caren, N. (2018). The political institutions, processes, and outcomes movements seek to influence. In D. A. Snow (Ed.), *The Wiley Blackwell Companion to Social Movements* (pp. 447–465). John Wiley and Sons.
- Amenta, E., Caren, N., Chiarello, E., and Su, Y. (2010). The political consequences of social movements. *Annual Review of Sociology*, 36, 287–307. <https://doi.org/10.1146/annurev-soc-070308-120029>

- Amenta, E., and Chen, Q. (2023). Social movements and "social security": Policy ideas, discursive ratification, and the U.S. old-age pension movement. *Mobilization: An International Quarterly*, 27(4), 445–465. <https://doi.org/10.17813/1086-671X-27-4-445>
- Amenta, E., Halfmann, D., and Young, M. (1999). The strategies and contexts of social protest: Political mediation and the impact of the Townsend Movement in California. *Mobilization: An International Quarterly*, 4(1), 1–23. <https://doi.org/10.17813/maiq.4.1.y66180053qg16252>
- Andrews, K., and Edwards, B. (2004). Advocacy organizations in the US political process. *Annual Review of Sociology*, 30, 479–506. <https://doi.org/10.1146/annurev.soc.30.012703.110542>
- Basseches, J. A. (2019). "It happened behind closed doors": Legislative buffering as an informal mechanism of political mediation. *Mobilization: An International Quarterly*, 24(3), 365–388. <https://doi.org/10.17813/1086-671x-24-3-365>
- Bernstein, M., and Jasper, J. (1996). Interests and credibility: Whistleblowers in technological conflicts. *Social Science Information*, 35(3), 565–589. <https://doi.org/10.1177/053901896035003008>
- Berry, B. (2004). Organizational culture: A framework and strategies for facilitating employee whistleblowing. *Employee Responsibilities and Rights Journal*, 16(1), 1–11.
- Berry, J. M. (1999). *The New Liberalism: The Rising Power of Citizen Groups*. Brookings Institution.
- Bosi, L. (2016). Social movements and interrelated effects: The process of social change in the post-movement lives of Provisional IRA volunteers. *Revista Internacional de Sociología*, 74(4), 47. <http://dx.doi.org/10.3989/ris.2016.74.4.047>
- Bosi, L., Giugni, M., and Uba, K. (2016). *The consequences of social movements*. Cambridge University Press.
- Bosi, L., and Uba, K. (2021). Collective Action Outcomes: Ways Forward for the Subfield. *Partecipazione e Conflitto*, 14(3), 987–997.
- Bosi, L., and Zamponi, L. (2015). Direct social actions and economic crises: The relationship between forms of action and socio-economic context in Italy. *Partecipazione e Conflitto*, 8(2), 367–391. <https://doi.org/10.1285/i20356609v8i2p367>
- Bosi, L., and Zamponi, L. (2020). Paths toward the same form of collective action: Direct social action in times of crisis in Italy. *Social Forces*, 99(2), 847–869. <https://doi.org/10.1093/sf/soz160>
- Boutcher, S. A., and McCammon, H. J. (2019). Social movements and litigation. *The Wiley Blackwell Companion to Social Movements*, 306–321.
- Braun, V., and Clarke, V. (2019). Reflecting on reflexive thematic analysis. *Qualitative Research in Sport, Exercise and Health*, 11(4), 589–597. <https://doi.org/10.1080/2159676X.2019.1628806>
- Burstein, P. (1999). Social movements and public policy. In M. Giugni, D. McAdam, and C. Tilly (Eds.), *How social movements matter* (pp. 3–21). University of Minnesota Press.
- Burstein, P. (2020). Testing theories about advocacy and public policy. *Perspectives on Politics*, 148–159. <https://doi.org/10.1017/S1537592719004663>
- Bushnell, A. M. (2020). Reframing the whistleblower in research: Truth-tellers as whistleblowers in changing cultural contexts. *Sociology Compass*, 14(8), 1–13. <https://doi.org/10.1111/soc4.12816>
- Ceva, E., and Bocchiola, M. (2020a). Theories of whistleblowing. *Philosophy Compass*, 15(1), e12642.
- Ceva, E., and Bocchiola, M. (2020b). Theories of whistleblowing. *Philosophy Compass*, 15(1), e12642. <https://doi.org/10.1111/phc3.12642>
- Chen, C. X., Nichol, J. E., and Zhou, F. H. (2017). The effect of incentive framing and descriptive norms on internal whistleblowing. *Contemporary Accounting Research*, 34(4), 1757–1778.
- Chiasson, M., Johnson, G. H., and Byington, J. R. (1995). Blowing the whistle: Accountants in industry. *The CPA Journal*, 65(2), 24.

- Cho, Y. J., and Song, H. J. (2015). Determinants of whistleblowing within government agencies. *Public Personnel Management*, 44(4), 450–472.
- Culiberg, B., and Mihelič, K. K. (2017a). The evolution of whistleblowing studies: A critical review and research agenda. *Journal of Business Ethics*, 146, 787–803.
- Culiberg, B., and Mihelič, K. K. (2017b). The Evolution of Whistleblowing Studies: A Critical Review and Research Agenda. *Journal of Business Ethics*, 146(4), 787–803. <https://doi.org/10.1007/s10551-016-3237-0>
- De Fazio, G. (2012). Legal opportunity structure and social movement strategy in Northern Ireland and Southern United States. *International Journal of Comparative Sociology*, 53(1), 3–22. <https://doi.org/10.1177/0020715212439311>
- De Maria, W. (2008). Whistleblowers and organizational protesters: Crossing imaginary borders. *Current Sociology*, 56(6), 865–883. <https://doi.org/10.1177/0011392108095343>
- Dungan, J. A., Young, L., and Waytz, A. (2019). The power of moral concerns in predicting whistleblowing decisions. *Journal of Experimental Social Psychology*, 85, 103848.
- Dworkin, T. M., and Baucus, M. S. (1998). Internal vs. External whistleblowers: A comparison of whistleblowing processes. *Journal of Business Ethics*, 17(12), 1281–1298.
- Elliott-Negri, L., Jabola-Carolus, I., Jasper, J., Mahlbacher, J., Weisskircher, M., and Zhelnina, A. (2021). Social Movement Gains and Losses: Dilemmas of Arena Creation. *Partecipazione e Conflitto*, 14(3), 998–1013.
- Farrell, D., and Petersen, J. C. (1982). Patterns of Political Behavior in Organizations. *The Academy of Management Review*, 7(3), 403–412. <https://doi.org/10.2307/257332>
- Fligstein, N., and McAdam, D. (2011). Toward a general theory of strategic action fields. *Sociological Theory*, 29(1), 1–26.
- Gao, L., and Brink, A. G. (2017). Whistleblowing studies in accounting research: A review of experimental studies on the determinants of whistleblowing. *Journal of Accounting Literature*.
- Giugni, M. (2007). Useless protest? A time-series analysis of the policy outcomes of ecology, antinuclear, and peace movements in the United States, 1977-1995. *Mobilization: An International Quarterly*, 12(1), 53–77. <https://doi.org/10.17813/mai.12.1.b05j1087v7pxg382>
- Hilson, C. (2002). New social movements: The role of legal opportunity. *Journal of European Public Policy*, 9(2), 238–255.
- Howse, R., and Daniels, R. J. (1995). Rewarding whistleblowers: The costs and benefits of an incentive-based compliance strategy. *Departmental Papers (School of Law)*, 4.
- Jabola-Carolus, I., Elliott-Negri, L., Jasper, J. M., Mahlbacher, J., Weisskircher, M., and Zhelnina, A. (2020). Strategic interaction sequences: The institutionalization of participatory budgeting in New York City. *Social Movement Studies*, 19(5–6), 640–656. <https://doi.org/10.1080/14742837.2018.1505488>
- Jasper, J. (1997). *The Art of Moral Protest: Culture Biography, and Creativity in Social*. The University of Chicago Press.
- Jasper, J. (2006). *Getting your way: Strategic dilemmas in the real world*. The University of Chicago Press.
- Jasper, J. (Forthcoming). Theories of strategic outcomes. In Jasper et al. (Ed.), *Gains and Losses: How Protestors Win and Lose*.
- Jasper, J., Elliott-Negri, L., Jabola-Carolus, I., Kagan, M., Mahlbacher, J., Weisskircher, M., and Zhelnina, A. (2022). *Gains and Losses: How Protestors Win and Lose*. <https://doi.org/10.1093/oso/9780197623251.001.0001>
- Jasper, J., Moran, K., and Tramontano, M. (2015). *Strategy: Vol. The Oxford Handbook of Social Movements* (D. Della Porta and M. Diani, Eds.). Oxford University Press, Oxford.

- Jubb, P. B. (1999). Whistleblowing: A restrictive definition and interpretation. *Journal of Business Ethics*, 21(1), 77–94. <https://doi.org/10.1023/A:1005922701763>
- Keane, J. (2009). *The Life and Death of Democracy*. Simon and Schuster.
- Kenny, K., and Bushnell, A. (2020). How to Whistle-Blow: Dissensus and Demand. *Journal of Business Ethics*, 164(4), 643–656. <https://doi.org/10.1007/s10551-019-04401-7>
- King, B. G. (2008). A political mediation model of corporate response to social movement activism. *Administrative Science Quarterly*, 53(3), 395–421. <https://doi.org/10.2189/asqu.53.3.395>
- King, B. G., and Jasper, J. M. (2022). Strategic interactions and arenas: A sociological perspective on strategy. *Strategic Organization*, 20(4), 810–820.
- King, B. G., and Walker, E. T. (2014). Winning hearts and minds: Field theory and the three dimensions of strategy. *Strategic Organization*, 12(2), 134–141. <https://doi.org/10.1177/1476127014529758>
- Loyens, K., and Vandekerckhove, W. (2018). Whistleblowing from an International Perspective: A Comparative Analysis of Institutional Arrangements. *Administrative Sciences*, 8(3), 30. <https://doi.org/10.3390/admsci8030030>
- Mansbridge, J., and Flaster, K. (2007). The cultural politics of everyday discourse: The case of "male chauvinist." *Critical Sociology*, 33(4), 627–660. <https://doi.org/10.1163/156916307X210973>
- Martin, B. (2009). Corruption, outrage, and whistleblowing. In *Research companion to corruption in organizations*. Edward Elgar Publishing.
- Mattoni, A., and Odilla, F. (2021). Digital Media, Activism, and Social Movements' Outcomes in the Policy Arena. The Case of Two Anti-Corruption Mobilizations in Brazil. *Partecipazione e Conflitto*, 14(3), 1127–1150.
- McCammon, H. J., and McGrath, A. R. (2015). Litigating change? Social movements and the court system. *Sociology Compass*, 9(2), 128–139.
- McCann, M. (2006). Law and Social Movements: Contemporary Perspectives. *Annual Review of Law and Social Science*, 2(1), 17–38. <https://doi.org/10.1146/annurev.lawsocsci.2.081805.105917>
- McCann, M. W. (1991). Legal mobilization and social reform movements: Notes on theory and its application. *Studies in Law, Politics, and Society*, 2025–2254.
- Meyer, D. S., and Staggenborg, S. (2012). Thinking about strategy. In G. M. Maney (Ed.), *Strategies for social change* (pp. 3–22). University of Minnesota Press.
- Miceli, M. P., Dreyfus, S., and Near, J. P. (2014). Outsider 'whistleblowers': Conceptualizing and distinguishing 'bell-ringing' behavior. In A. J. Brown, R. E. Moberly, D. Lewis, and W. Vandekerckhove (Eds.), *International Handbook on Whistleblowing Research* (pp. 71–94). Edward Elgar Publishing.
- Near, J. P., and Jensen, T. C. (1983). The Whistleblowing Process: Retaliation and Perceived Effectiveness. *Work and Occupations*, 10(1), 3–28. <https://doi.org/10.1177/0730888483010001001>
- Near, J. P., and Miceli, M. P. (1985). Organizational dissidence: The case of whistle-blowing. *Journal of Business Ethics*, 4(1), 1–16. <https://doi.org/10.1007/BF00382668>
- Near, J. P., and Miceli, M. P. (1996). Whistle-blowing: Myth and reality. *Journal of Management*, 22(3), 507–526. [https://doi.org/10.1016/S0149-2063\(96\)90034-3](https://doi.org/10.1016/S0149-2063(96)90034-3)
- Olesen, T. (2019). The politics of whistleblowing in digitalized societies. *Politics and Society*, 47(2), 277–297. <https://doi.org/10.1177/0032329219844140>
- Olesen, T. (2021). Democracy's Autonomy Dilemma: Whistleblowing and the Politics of Disclosure. *Sociological Theory*, 39(4), 245–264. <https://doi.org/10.1177/07352751211054874>
- Olesen, T. (2022a). The birth of an action repertoire: On the origins of the concept of whistleblowing. *Journal of Business Ethics*, 179(1), 13–24.

- Olesen, T. (2022b). Whistleblowing in a time of digital (in)visibility: Towards a sociology of 'grey areas.' *Information, Communication and Society*, 25(2), 295–310.
<https://doi.org/10.1080/1369118X.2020.1787484>
- Park, H., and Lewis, D. (2019). The motivations of external whistleblowers and their impact on the intention to blow the whistle again. *Business Ethics: A European Review*, 28(3), 379–390.
- Ramirez, M. K. (2007). Blowing the Whistle on Whistleblower Protection: A Tale of Reform versus Power. *University of Cincinnati Law Review*, 76(1), 183–234.
- Rosanvallon, P. (2008). *Counter-democracy: Politics in an Age of Distrust* (Vol. 7). Cambridge University Press.
- Schultz, D., and Harutyunyan, K. (2015). Combating corruption: The development of whistleblowing laws in the United States, Europe, and Armenia. *International Comparative Jurisprudence*, 1(2), 87–97.
<https://doi.org/10.1016/j.icj.2015.12.005>
- Stevenson, W. B., and Greenberg, D. (2000). Agency and social networks: Strategies of action in a social structure of position, opposition, and opportunity. *Administrative Science Quarterly*, 45(4), 651–678.
<https://doi.org/10.2307/2667015>
- Su, X., and Ni, X. (2018). Citizens on patrol: Understanding public whistleblowing against government corruption. *Journal of Public Administration Research and Theory*, 28(3), 406–422.
- Uba, K. (2009). The contextual dependence of movement outcomes: A simplified meta-analysis. *Mobilization: An International Quarterly*, 14(4), 433–448.
<https://doi.org/10.17813/maiq.14.4.m8477j873p47p546>
- Uys, T. (2000). The politicisation of whistleblowers: A case study. *Business Ethics: A European Review*, 9(4), 259–267. <https://doi.org/10.1111/1467-8608.00199>
- Zald, N. (1996). Culture, ideology, and strategic framing. In D. M. McAdam (Ed.), *Comparative perspectives on social movements: Political opportunities, mobilizing structures, and cultural framings*. Cambridge University Press.

ACKNOWLEDGEMENTS

The author acknowledges that the research for this paper has been conducted thanks to the support of the Scuola Normale Superiore and finalized in the framework of the BIT-ACT project funded by the European Research Council (ERC) under the European Union's Horizon 2020 research and innovation program (Grant agreement No 802362).

Author's Information:

Alessandra Lo Piccolo is a Research Fellow at the University of Bologna, Department of Political and Social Sciences. She attained her Ph.D. at the Scuola Normale Superiore, investigating the accountability consequences of grassroots anti-corruption mobilizations in Italy and Spain. Over the years, she has conducted research on the impact of civil society initiatives on governmental transparency, whistleblowers' protection, and civic monitoring. Her research interests include political sociology, political corruption, collective action, and relational sociology.