

Review of the Attempts of the Government for the Implementation of Whistleblower Laws in Khyber Pakhtunkhwa (2016-22)

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Abstract: This research study has explored that the KP Whistleblower Protection and Vigilance Commission Act of 2016 by PTI government is a positive step in progress towards increasing transparency and accountability in Khyber Pakhtunkhwa Province. The study has highlighted the key provisions, safeguards for whistleblowers, the success extant, effectiveness and the main challenges that are facing by the commission for the successful implantation of the laws. Qualitative Research design has been adopted for the study with key informant interviews of PTI Provincial Assembly members both from ruling Party in government and opposition members along with the officials of the said commission. The study investigate that strong whistleblower protection laws are in an embryonic phase in the province and lots of threats and challenges are prevalent that has slowed down the effective implantation of the act in real spirit. Suggestions are offered for improvement to execute the laws in proper ways for good governance.

Keywords: Whistleblower, WPVCA, Khyber Pakhtunkhwa, Accountability& Transparency, UNCAC

Introduction

Once Napoleon said that "*The silence of the innocent is often more harmful than the words of the guilty*", (O'Meara, 1885). These profound words, spoken by Napoleon Bonaparte, emphasize the significance of speaking truth to power and exposing wrongdoing. This silence can have sound and extensive effects on public administration and governance, such as bribery, misuse of power, and violations of citizens' rights. In order to break this silence and encourage accountability and transparency in government, Khyber Pakhtunkhwa, Pakistan, passed the significant Whistleblower Protection and Vigilance Commission Act 2016. The Act purposes to authorize people and promise that authority is used correctly by giving whistleblowers a legal structure to uncover corruption, malpractice and misconduct without fear of revenge and retaliation. The importance of the Whistleblower Act in promoting good governance and defending individuals' rights in KP, Pakistan, is examined in this essay. Whistleblowing has become a crucial tool for promoting transparency and accountability as Pakistan struggles with issues related to good governance. The strategically important province of Khyber Pakhtunkhwa (KP), which is located at the intersection of South Asia, is the first in Pakistan to make considerable efforts to enact laws protecting whistleblowers (Shah S. A., 2019). The main whistleblower laws in KP, their impact on provincial society, and future issues are all covered in this research study.

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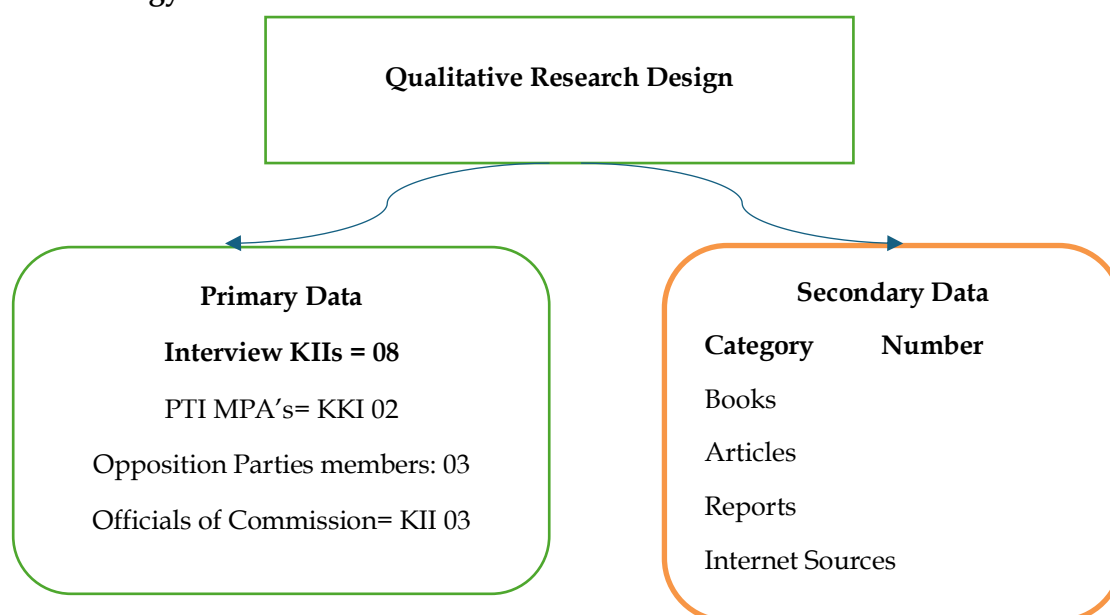
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The PTI led coalition government in the Khyber Pakhtunkhwa (KP) has crafted remarkable improvement in executing whistleblower legislation. In 2016, the Provincial Assembly of Khyber Pakhtunkhwa overwhelmingly enacted the Khyber Pakhtunkhwa Whistleblower Protection and Vigilance Commission Act, an innovative statute in the province that provides protection to whistleblowers. This was Pakistan's first law, and other provinces soon followed suit. The KP Whistleblower Protection and Vigilance Commission Act (WPVCA) pursued to raise transparency and accountability in government institutions. It provided employees a secure and safe way to report delinquency, corruption, or malpractice without fear of retaliation. The law also recognized the Whistleblower Protection and Vigilance Commission, which was in charge of investigative complaints and protecting whistleblowers (Iqbal, 2018)

World International organizations like the United Nations Convention against Corruption and the International Labour Organization's Whistleblower Protection Guidelines highlight the critical importance of whistleblower protection. In addition to endorsing transparency, accountability, and good governance internationally, these doctrines highlight the importance of safeguarding whistleblowers. Whistle blowers safety is so crucial in promoting organizational integrity, combating corruption, and defending human rights as without these just, accountable transparent and peaceful society is not possible (Olesen, 2021). The review intended to evaluate how efficiently the Khyber Pakhtunkhwa Whistleblower Protection and Vigilance Commission Act has decreased corruption and promoted whistleblowing by investigating the specific stages taken by the provincial government to protect the secrecy and confidentiality of those who report delinquency.

This exploratory study is an attempt to discover the extent to which WPVCA has curtailed corruption and promote whistleblowing, tried to reveal the protections that are placed by KP to guarantee the privacy and anonymity of whistleblowers. The research paper has examined the effectiveness of WPVCA in looking into and handling complaints from whistleblowers, main obstacles to the Act's implementation that the WPVC must overcome.

Methodology



Background of the Study

A whistleblower is a person who reports or publishes information about the Illegal actions of public officials, their unjust behaviour with general masses, incompetency in administrative management, financial irregularities in governmental as well as public affairs, Human Rights Violations, Breach of Public Trust and Corruption. Whistleblowers often possess firsthand knowledge or evidence and act with the genuine aim to expose wrongdoing. A whistleblower intended to defend the greater good, Public interest not personal benefit and unfortunately frequently suffer threats, reprisal, and personal consequences (Hameed, 2016).

A whistleblower uncovers misconduct by an organization's employees, whether in a public or private setting. Certain actions fall under the category of wrongdoings. The act must be relevant to the general public's interests. The public must be informed. In several nations, whistleblowers are protected by legislation. He or she usually receives compensation for raising the alarm. The legal meaning of whistleblowing is not universally accepted. According to the International Labour Organisation (ILO), it is "the reporting by employees or former employees of illegal, irregular, dangerous, or unethical practices by employers," (Scaturro, 2018).

In another definition offered by United Nations Convention against Corruption (UNCAC) it is "any person who reports in good faith and on reasonable grounds to the competent authorities any facts concerning offences". Council of Europe Civil Law Convention defined it as "employees who have reasonable grounds to suspect corruption and who report their suspicion to responsible persons or authorities in good faith". (Chen, 2019)

Whistleblowing originated in ancient civilisations, where individuals who revealed wrongdoing or corruption were frequently hailed as heroes. Aristotle (384-322 BCE), an ancient Greek philosopher, saw the value of speaking truth to power and emphasized the responsibility of individuals in keeping authorities responsible. Similarly, in ancient Rome, the statesman Cicero (106-43 BCE) applauded those who revealed corruption, stating that "the safety of the people is the highest law" (Olesen, 2021).

However, the contemporary notion of whistleblowing began to emerge in the nineteenth century. During the American Civil War, the United States government passed the False Claims Act in 1863, allowing ordinary persons to denounce fraud and corruption in government contracts. This statute was a key turning point since it gave legal rights for whistleblowers and set a precedent for rewarding people who exposed injustice (Clements, 2005).

The word "whistleblower" was created in the 1960s by American consumer advocate Ralph Nader. Nader popularised the word to characterise anyone who "blew the whistle" on corporate and government malfeasance, emphasising the value of openness and accountability. The 1970s and 1980s witnessed an increase in whistleblower cases, such as the Pentagon Papers controversy, which revealed official secrets about the Vietnam War, and the Watergate discoveries, which led to President Richard Nixon's resignation (Chen, 2019).

Whistleblowers have historically played an important role in exposing wrongdoing, fostering accountability, and altering public policy. Whistleblowers have exhibited tremendous bravery and conviction throughout history, encouraging others to speak truth to power and seek justice. Whistleblower

protection laws and practices are always evolving, recognising the critical necessity of protecting people who risk everything to expose wrongdoing and preserve the public good. There are many types of whistleblowers like Internal within an organisation, from outside the institution, governmental reporters of misconduct or corporate malfeasance, reporting on societal concerns etc. (Basri & Marsam, 2016).

Whistleblower protection is essential for - securing accountability, transparency, and good governance equally in both public and private sectors of the country. Through protecting individuals who uncover the delinquency, corruption, or other offense, such rules support in creating a culture of reliability and responsibility. This, in turn, decreases deception, shields public resources, and encourages compliance with laws and principles. Tough whistleblower precautions deliver a safe, helpful environment where personnel can raise concerns without fear of reprisal, promoting open dialogue and increasing administrative accountability (Hameed, 2016).

Likewise, whistleblower protection is pivotal in uncovering systemic inequalities, human rights manipulations, and environmental worries, eventually leading to a more rational and fair society. Whistleblower protection guidelines enable persons to hold onto those in authority responsible by proposing a secure passage for reporting delinquency, the consolidation of democratic and legal values. Similarly, vigorous whistleblower protection systems can help to regenerate public belief in administrations, raise credibility, and provide economic stability (Basri & Marsam, 2016).

PTI government and management have renowned the Whistleblower protection laws crucial for Pakistan and KP in their dialogues and election Manifesto's of 2013 and 2018. Their narratives openly itemized that whistleblowers could boost transparency, accountability, and good government in significant way. It could better safeguards public funds, inspires integrity, prevents fraud, protects individuals who reveal misconduct, and ensures that the law is followed. Keeping in view these effects for implementing good governance their provincial government in 2016 came out with WPVA. The PTI provincial government Act of KP's whistleblower laws objective is to speed up the prosecution of offenders and forbid those activities that harm national security (Hameed, 2016).

However, despite this expansion, there is still room for development. To address problems like unfair treatment, intimidation, and financial loss, strong whistleblower protection laws are still in embryonic phase not only in the KP province but throughout Pakistan. There is ominous need to enact more effective whistleblower laws and stern procedures and bi-laws for practical implementation of these laws. More work is required to effectively implement UNCAC principles. KP's whistleblower law is a positive start but the real effective work for the inserting of the laws is not satisfactory (News, 2024)

Discussion and Findings

During in an interview with the scholar, official of the Whistleblower Protection and Vigilance Commission Sadiq Khan has acknowledged about the included critical provisions of the KP WPVC of 2016. He says that these provisions of the act protected whistleblowers and encourage transparency:

- He told that after receiving and investigating complaints the Commission being an impartial agency safeguarded whistleblowers' secrecy and anonymity and their names were kept secure, and anonymous reporting is permitted for better investigation.

- He informed the researcher that the statute shielded public personnel, including government employees, and private citizens who denounced corruption, malfeasance, or maladministration. Whistleblowers were protected from reprisal, harassment, and victimization.
- He praised the accuracy of the law by saying that it is consistent with international norms, including the United Nations Convention against Corruption and has been appreciated by every circle round the corner of the province.
- He says that the Act established particular authorities to accept complaints, such as the Commission, government departments, and law enforcement agencies. Whistleblowers may report orally or in writing.
- The Commission reviewed complaints and recommended actions to the appropriate authorities. If necessary, the Commission may also order prosecution.
- He speaks that the laws clearly mentions of those Individuals who retaliated against whistleblowers that their revenge will confronted punishments such as jail and fines.
- Sadiq Khan also confirms that the Commission might compensate whistleblowers that provide information that leads to successful prosecutions or the recovery of public cash.
- The Act required yearly reporting to the Provincial Assembly, promoting openness and accountability (Men Official, KII, 01).

During an interview with PTI MPA Shaukat Yousafzai who was also one of the main contributors of this act briefed the scholar that the enacted Act in 2016, WPVA is a major turning point in Pakistan's anti-corruption efforts. He says that corrupt practices has been decreased to great extent as a result of the Act's strong framework for protected disclosures, which has encouraged citizens to come forward with information about wrongdoing. He further asserted the KP Whistleblower Act provides a model for other provinces, showing how successful legislation can be in reducing corruption and advancing good governance in Pakistan (Men MPA, KII 01).

Arshad Khan the other official of the commission assert that, according to Transparency International's 2020 report as compared to other provinces of Pakistan , KP saw a 40% decrease in corruption incidents. He believed that the effectiveness of the Act can be credited to its extensive features, which include prizes for whistleblowers. He told that the secrecy guarantees, and protection from revenge that the act assurance could best work. He also claimed that Whistleblowing reports have increased in the province. He says that between 2017 and 2020, more than 1,500 instances were reported, leading to the recovery of PKR 1.3 billion in embezzled money (Men Official, KII,02)

Sadiq Khan told the researcher that the Act's effects go beyond financial gains because it has encouraged government institutions to adopt a transparent and accountable culture. He says that the ability of important departments to look into and prosecute corruption cases has increased, including the KP Anti-Corruption Department and the Provincial Ombudsman. He asserted that the Act has boosted the deterrent effect of whistleblowing on possible corrupt actors by encouraging media outlets and civil society organisations to aggressively promote it (Men Official, KII, 01).

Sardar Hussain Babak (ANP) opposition member of Provincial Assembly told the scholar that d the law could encourage espionage in government departments and create enmities among people. He also argued that the law is unnecessary, as institutions like NAB, Ehtesab Commission, and Anti-Corruption already exist to curb corruption. Contrary to establishing a new commission, strengthening

and developing existing institutions, such as the National Accountability Bureau (NAB) and the Ehtesab Commission, would be a more effective approach to combating corruption. He further emphasized that this approach would not only reduce the risk of creating unnecessary bureaucratic structures but also leverage the expertise and resources (Men, opposition, KII, 01)..

Sobia Shahid the other opposition leader too expressed her concerns to the researcher in key informant interview and said that the Act could be misused for political victimization, as the ruling party could use it to target opposition members. She also told that the Whistleblower Protection and Vigilance Commission Act 2016 may be susceptible to political manipulation, allowing the ruling party to exploit the law for partisan gains and target opposition members. This risk highlights the need for robust safeguards to prevent the misuse of the Act for political purposes (women, opposition, KII, 01).

Similarly Muhammad Ali Shah of JI also criticized the Act for lacking provisions to protect whistleblowers from false accusations and harassment. The Whistleblower Protection and Vigilance Commission Act 2016 fail to provide adequate safeguards for whistleblowers against false accusations and harassment. This omission underscores the importance of incorporating robust measures to protect whistleblowers from retaliatory actions and ensure their safety (Men, opposition, KII, 02).

Challenges and Threats to the Successful Implementation of the Laws

The official of the commission Sibghatullah Khan told the researcher that unfortunately the commission lacks autonomous Status due to which political interference is on its peak. He said that political meddling prevented the WPVC in KP from being independent, which made it difficult for it to properly look into corruption accusations. He gave an example of the occurrence of the issue in 2018 about the corruption in Billion Tsunami Tree Project. He told that the provincial administration pressured the commission to abandon an inquiry into a senior minister's who is alleged in wrongdoing in the mentioned project it (Men Official, KII, 03).

He further briefed the scholar that the Commission in KP faced a shortage of staff and resources, hindering its ability to investigate complaints efficiently. He told that in 2019, the commission had only five investigators to handle over 500 complaints, leading to significant delays and a backlog of cases. He again gave an example of Abdul Razzaq, a whistleblower, that he filed a complaint with the commission against a corrupt government official. However, due to inadequate resources, the commission took over a year to investigate and resolve the case, causing Abdul significant distress and financial losses (Men Official, KII, 03).

Sadiq Khan elevated parallel concerns by saying that the Act's imprecise protections for whistleblowers has made it tough to implement. He highlighted that the law's vague definition of "whistleblower" created misunderstanding for both the community and public servants. He quoted Maria Khan, a government worker who uncovered transgression but the uncertain language left her ambiguous about her position and disheartened her from pursuing the matter further. (Men Official, KII, 01).

The act does not have strong enough procedures to stop whistleblowers from retaliation or employers from punishing people who speak out. For instance the 2019 case of Ahmad Ali a whistleblower was dismissed after the disclosure of misconduct. Subsequently after the reporting the corruption, he was

bare to pressure and compulsion, signifying that the statute did not stop such retaliations. Another informant also suffered from pressure and compulsion after reporting corruption. Though he appealed the Act's shields, he sustained to face revenges because the protections were insufficient. (Ali Z. , 2019).

The commission also has to deal with the law's limited jurisdiction. The law did not conceal the Local governments, businesses, NGOs and the private sector too. Only provincial government entities were included in the Act. Consequently, the Act would not be put on that citizen who is involved in the corruption of the local government departments and thus the citizen could not be able to redress at local level. That is why Ayesha Khan' has to pursue other options in reporting corruption in a private corporation as the law could not be applied to private sector organizations. She was forced to bear expensive and time-consuming routes (Shah, 2019).

The Whistleblower Act of 2016 has provided weak legal framework that damages strong whistleblower safeguards. As the act has not defined the basic terms like "whistleblower," "public-interest disclosure," and "victimization" openly, so it has created confusion and ambiguity (Transparency International Pakistan, 2019). Moreover, the Act has limited the access of the whistleblowers' to relevant papers and information that are essential for disclosure. The matter is made intensified by the absence of impartial oversight bodies to keep an eye on how the Act is being executed and assure compliance. Besides that, the deficiency of sanctions for non-compliance, such as financial fines or imprisonment, diminishes government agencies' incentive to carry out the Act effectively, which ultimately discourages its application. Furthermore, the law judicial review process is limited, for example one can only challenge a verdict if it halts natural-justice guidelines or the department exceeded from its authority. Likewise, the Act lacks appeal mechanism of whistleblowers 'for instance, if the Commission rules against someone, he or she is not allowed to go to the higher court for further process to pursue transparency. In addition to that, only thirty days' time deadline to gather evidence and submit your file or case is too unfavorable for any whistleblower. The Act involves whistleblowers to demonstrate a high degree of wrongdoing or impropriety required in order to interfere in the Commission's rulings, which can be problematic to achieve (Khan, 2020).

Arshad Khan informed the scholar that Whistleblowers in KP feared reprisals from powerful individuals or groups, which deterred them from reporting corruption. He said that a government employee discovered corruption in a high-profile project ('Billion Tree Tsunami' project of the Forest Department) but didn't report it due to fear of retaliation from the influential project director. The worker faced threats and harassment from the accused officials. The whistleblower had to seek police protection and eventually went into hiding due to fear of retaliation (Men Official, KII, 03).

One of the cultural challenges to the laws in KP is that citizen witnessed corruption by a respected community elder but didn't report it to avoid disrespecting the elder. This social norm hindered execution of law because people considered it disrespectful in the "respect for elders" and also "avoiding conflict". The same phenomena is manifested in 2019 survey where 70% of respondents in KP believed that reporting corruption against someone elder or of higher social status is their insult (Shah S. A., 2019).

Another report in 2020 found that only 12% of citizens in KP were aware of the Whistleblower Protection and Vigilance Commission Act 2016. The report discovered that Citizens had little understanding of the Act and their rights as whistleblowers even a government employee exposed corruption but didn't know

how to report it or what protections were available under the Act (Transparency International Pakistan, 2019).

Primary Safeguards of PTI KP Government for Whistleblowers

The PTI MPA Shahram Tarakai told the researcher that to safeguard whistleblowers need PTI top leadership dedication by demonstrating strong commitment to transparency and accountability. They need to set and lead example by promoting culture of encouraging whistleblowers to come forward without any hesitation. The PTI provincial government timely action, and secure reporting techniques. PTI government in KP may improve its anti-corruption framework, encourage transparency, and ensure accountability by embracing international norms and principles, such as those established by the International Labour Organisation (Men, MPA, KII, 02)

MPA Shaukat Yousafzai told that the KP government protects whistleblowers from retaliation through the Whistleblower Protection and Vigilance Commission Act 2016. As per the Act if a government employee reports corruption and faced retaliation from their supervisor. The Commission will intervene and protects the whistleblower's job and identity. The KP WPVC pledges that the identities of whistleblowers are preserved private and that their disclosures are handled safely. So it could be assumed that Confidential Reporting is there. He further told that the KP government has established an online portal and a phone helpline for whistleblowers to report corruption anonymously and securely. He was sure that any citizen of the province could report corruption through the online portal and remained anonymous throughout the investigation process (Men, MPA, KII, 02)

To keep the scope of whistleblower efforts high, the government provides incentives to people who come forward with information about wrongdoing. The KP government offers financial rewards and compensation to whistleblowers for those reporting that leads to the recovery of stolen assets or the imposition of penalties on corrupt officials. According to Dawn news on August 23, 2019, the KP government awarded a whistleblower PKR 1 million for reporting a major corruption scandal involving the misappropriation of funds meant for a development project. The whistleblower's report led to the recovery of PKR 50 million in embezzled funds and the dismissal of several corrupt officials (Dawn, 2019).

As required by the Khyber Pakhtunkhwa Provincial Ombudsman Act 2016, the Provincial Ombudsman's office in KP serves as an unbiased body to address whistleblower complaints and provide solutions. Whistleblowers could Submit complaints with the office of the Ombudsman' about misconduct or inefficient management in governmental official behavior, corruption etc. (Section 10, Khyber Pakhtunkhwa Provincial Ombudsman Act 2016). To keep defend the whistleblowers from retaliations, the office processes complaints discreetly and secretly (Section 11, Khyber Pakhtunkhwa Provincial Ombudsman Act 2016). The Ombudsman's office offers whistleblowers compensation, restitution, or other suitable redress. By considering the grievances and presenting its findings to the provincial authorities, the office prompts accountability and honesty in government. Anti-Corruption Department in the province of KP scrutinizes the allegations of corruption and that held accountable those are responsible. The system make sure that the issues are speedily inspected, preserving transparency throughout the region (assembly, 2016)

Recommendation

- ❖ A precise meaning of "whistleblower" and "protected disclosure" ought to be incorporated to second Section of the Act in order to avoid misperception and guarantee thorough reporting (Khan, 2020).
- ❖ For the purpose to protect satisfactorily whistleblowers from revenge, including legal protection, replacement, and obscurity, seventh Section of the Act should be strengthened (Shah, 2019).
- ❖ With the aim to prevent misuse of power, tenth Section of the Act should be amended to secure accountability and transparency in the inquiry and prosecution process, including the formation of accountability tools (Transparency International Pakistan, 2019).
- ❖ To enlighten people, government officers, and law implementation organizations, a new section should be introduced to the Act of the whistleblower provisions, (Khan, 2020).
- ❖ To look after the Act's execution and security its effectiveness in fighting corruption, an impartial commission must to be designed (Shah, 2019).
- ❖ Rescue 112 could be guided to provide assistance in emergency to those Whistleblowers who are in danger.
- ❖ Informal and safe reporting may paved the way by an accessible reporting system that could provide multiple channels, like internet platforms, dedicated phone lines, and in-person reporting choices.
- ❖ Whistleblowers need to be protected from revengeful actions by inclusive safeguards, including as law court protection, relocation provisions, and promise of confidentiality.
- ❖ To control power misuse and safeguard impartiality, it is vital to create accountability procedures that could ensure transparency throughout the enquiry and prosecution process.
- ❖ To bolster a culture of honesty and responsibility, it is indispensable to educate the people, public employers, and law administration organizations on the whistleblower laws and its provisions.
- ❖ A system of rewards and compensation could inspire people to come forward with important info, which can support fight against corruption and wrongdoing.

Conclusion

The 2016 Whistleblower Protection and Vigilance Commission Act is a principal step toward proceeding accountability, openness, and good governance in Khyber Pakhtunkhwa, Pakistan. The piece of study has observed at the Act's key characteristics, how well it struggles to curb corruption, and the problems that will come across. The mention study states that the Act has helped the province in reducing corruption and encourages whistleblowing. Nonetheless, the review also brings out a number of complications and threats to the Act's effective implementation, such as political interfering, a deficiency of funds, limited authority, in addition to social and cultural barriers. The investigation has presented a number of proposals to address these matters, such as modifying of the Act to provide whistleblowers more accurate definitions and strong securities, constructing a neutral commission to control the Act's implementation, and educating the people, government agents, and law execution organizations about the Act and its provisions. The assessment correspondingly emphasized how critical it is to defend whistleblowers from retaliations and to offer those economic rewards and payment as incentives. Even though Khyber Pakhtunkhwa's Whistleblower Protection and Vigilance Commission Act 2016 is a good launch for promoting accountability and openness in the region, additional struggle is essential to reassure its successful application and to resolve the complications it faces. The law can be a effective weapon in the fight against corruption and in progressing good governance in Khyber Pakhtunkhwa and somewhere else in the country if these are addressed and the investigation proposals are put into practice.

References

- Ali, M. (2018, September 2). *Govt fails to enforce conflict of interest, whistleblowing laws*. Retrieved October 25, 2024, from <https://www.dawn.com/news/1430447/govt-fails-to-enforce-conflict-of-interest-whistleblowing-laws>
- Ali, Z. (2019, January 9). *Whistleblower faces axe*. Retrieved May 14, 2024, from <https://www.dawn.com/news/1459381>(<https://www.dawn.com/news/1459381>)
- assembly, K. P. (2016). *Khyber Pakhtunkhwa Provincial Assembly. (2016). Khyber Pakhtunkhwa Provincial Ombudsman Act, 2016 (Act No. VIII of 2016)*. Peshawar: Khyber Pakhtunkhwa Provincial Assembly.
- Balijijia, S. K., & Min, S. K. (2023, August). Evaluating the effectiveness of whistleblower protection: A New Index. *Cambridge University Press Data and Policy*(2023), 5:e28.
- Basri, S. A., & Marsam, A. (2016). REINFORCEMENT TOOL OF WHISTLEBLOWING TO ERADICATE FRAUD IN PUBLIC SECTOR. *SHS Web of Conferences* 36, 00038 (2017).
- Chen, L. (2019, February). A Review of Research on Whistle blowing. *American Journal of Industrial Business Managment*, Vol,9 No 2.
- Clements, L. H. (2005, January). Whistleblowing: Who,What, Where, Why,How? *Journal of Foresnsic Accounting*, c 2005 Vol.VI(2005).
- Dawn. (2019). *KP govt rewards whistleblower with Rs1m*. Dawn. Pakistan: Dawn Newspaper.
- Hameed, T. (2016, November 16). *Laws For The Protection Of Whistleblowers In Pakistan*. Retrieved October 24, 2024, from courting the law, raising awariness and increasing accountability: <https://courtingthelaw.com/2016/11/15/commentary/laws-for-protection-of-whistleblowers-in-pakistan/>
- Iqbal, Z. (2018). Evaluating Whistle-blowing Regime in Pakistan. *Fourth annual ICGS Conference: Navigating Corporate Governance in Emerging Markets*. Fudan University Shanghai , China: ResearchGate.
- Khan, I. (2020). Whistleblower Protection Laws in Pakistan: A Critical Analysis. *Journal of Law and Society*, 47(2), 147-162.
- News, G. (2024, June 22). *transperancy International stresses adoption of whistleblower protection laws*. Retrieved November 3, 2024, from Transparency International Pakistan: transparency.org.pk/news
- Olesen, T. (2021). The birth of an action repertoire: on the origion of the concept of whistleblowing. *Journal of business Ethics*.
- O'Meara, B. E. (1885). *Napoeon's in Excile,or A voice from St.Helena* (Vol. 2). London: Vizetellay.
- Pakistan, T. I. (2019). *Whistleblower Protection in Pakistan: An Analysis*. Lahore: Transparency International Pakistan.
- Scaturro, R. (2018, May). Defining Whistleblowing. *IACA Research paper series no-5*.
- Shah, S. A. (2019). Implementation of Whistleblower Protection and Vigilance Commission Act 2013 in Khyber Pakhtunkhwa. *Journal of Public Administration and Governance*, 1-15.
- Shah, S. A. (2019). Implementation of Whistleblower Protection and Vigilance Commission Act 2013 in Khyber Pakhtunkhwa. *Journal of Public Administration and Governance*, 9(2),, 1-15.
- Shazia, s. (2022, september 19). review on whistleblower laws in KP. (M. A. Shah, Interviewer) Peshawar.
- Sultan, S. (2022, September 22). Best practices for the implmentation of whistleblowers laws in Pakistan. (S. MPA Taraki, Interviewer) Peshawar, Khyber Pakhtunkhwa, Pakistan.
- Sultan, S. (2022, September 22). infromation regarding WPVA of 2016. (S. Yousafai, Interviewer) Peshawar, Khyber Pakhtunkhwa, Paksitan.

- Sultan, S. (2022, september 19). review on the whistleblower Act in KP. (S. shahid, Interviewer)
- Sultan, S. (2022, September 9). review on whistle blower law in KP. (S. H. Babuk, Interviewer) Peshawar.
- Sultan, S. (2022, May 14). the Whistleblower Protection and Vigilance Commission Act 2016. (S. Khan, Interviewer) Peshawar, Khyber Pakhtunkhwa, Pakistan.
- Sultan, S. (2024, August 24). The Key provisions of the Whistleblower Protection and Vigilance Act of KP govt of 2016. (S. Khan, Interviewer) Peshawar, Khyber Pakhtunkhwa, Pakistan.