

**PROTECTION OF WHISTLE BLOWER AND THE RIGHT TO INFORMATION  
ACT, 2005- A DISSENSION AND COHESION WITHIN THE INDIAN LEGAL  
CONTOUR.**

**Name of Authors: I) Prof. Dr. Abhijit Bhattacharjee, II) Sakyasuddha Sarkar**

**Designation and Institutional Affiliation of 1<sup>st</sup> Author: PRINCIPAL, JALPAIGURI  
LAW COLLEGE, UNIVERSITY OF NORTH BENGAL.**

**Contact details of 1<sup>st</sup> Author: COLLEGE PARA, P.S. - KOTWALI, P.O.-JALPAIGURI,  
Dist. - JALPAIGURI, Pin-735101, State- WEST BENGAL, Country- INDIA.**

**Educational Qualification of 2<sup>nd</sup> Author- B.A. (HONS.) LL.B, LL.M, UGC NET, WEST  
BENGAL SET.**

**Contact details of 2<sup>nd</sup> Author: BEGUNTARY, P.S. - KOTWALI, P.O.-JALPAIGURI,  
Dist. - JALPAIGURI, Pin-735101, State- WEST BENGAL, Country- INDIA.**

**Abstract**

*The discourse on the issue regarding the right to information is probably the most important discourse of the modern-day world. But the increasing complexity, both in social and legal fabric, created the issue of whistle blowing, which almost mechanically created the issue of protection, which must be appended to the whistle blowers. But the legal dichotomy exists between these two apparently contradictory discourses. Because the right to get true information invariably means the dispensation of all the relevant data, but on the opposite side of the table, the issue regarding protection of whistle blowers needed a certain degree of anonymity, which is sine-qua-non for the safety of the whistle blower from the possible retaliation. This sense of security is the only tool available in the hands of a whistle blower,*

*and moreover, this sense will encourage the future whistle blowers to raise the issues that have a detrimental impact on the social and legal fabric. So far as India is concerned, the Right to Information Act, 2005 do not provide any express provision regarding the protection of the whistle blowers and the lack of any dedicated legislation for whistle blower protection like USA, also discourage the practice of whistle blowing and this in turn also reduce the effectiveness of the Right to Information Act, 2005 which can be used as a weapon by a whistle blower, which clearly manifest the need for more harmonious and recalibrated legal regime in this arena.*

**Keywords:** - 1) Right to information; 2) Whistle Blowing and Disclosure; 3) Whistle Blower Protection in India; 4) Judicial Stance on Whistle Blower Protection.

## **I) INTRODUCTION**

A pure contextual analysis divulges, at least prima facie, no interaction between the discourse of right to information on one hand and the protection of whistle blowers on the other.

But it is an undeniable fact that both the discourse of right to information and protection of whistle blowers is foursquarely connected with the issue of transparency, accountability and the maturity of democracy and the social institutions connected with democracy.

Though the apparent dissidence between the right to information and the issue of appending protection to whistle blowers possibly suggests two discourses. Firstly, the issue of right to information is a separate concept, without any footprint of the protection of whistle blowers within it, which suggests a more, if not entirely, a placid aspect of the issue regarding right to information. Secondly, it may suggest that the issue of appending protection to whistle blowers is assimilated within the discourse regarding right to information, so much so that separate treatment of the issue of whistle blower protection is not clamored for, if not entirely redundant.

In this context, the words of Honourable Justice K.K. Mathew (as he then was) must be remembered. The Learned Justice observes that, placing information beyond the reach of the common mass, is a compromise to the impartial nature of administration, and His Lordship continues, ‘The people of this country have a right to know every public act, everything that is done in a public way, by their public functionaries.....The right to know, which is derived from the concept of freedom of speech, though not absolute, is a factor which should make one wary...’<sup>1</sup>

Though His Lordship spawned the category of public security as a reservation within the issue regarding the right to know,<sup>2</sup> but it can be humbly submitted that, right to know is only a separate nomenclature for the discourse regarding right to information and the observations of the apex court of India through Honourable Justice K.K. Mathew, clearly suggests the issue of transparency in the domain of public functionary, which attract almost invariably, the issue regarding the protection of whistle blowers.

## **II) THE CONCEPT OF WHISTLE BLOWING IN THE INDIAN LEGAL PERCEPTION**

In the international parlance, probably the release of the Pentagon Papers in 1971,<sup>3</sup> surfaced the issue about the much needed protection for the whistle blowers, however rudimentary that may be.

---

<sup>1</sup> State of Uttar Pradesh v. Raj Narain, (1975) 4 SCC 428. See also Association for Democratic Reforms v. Union of India, [2024] 2 S.C.R. 420.

<sup>2</sup> State of Uttar Pradesh v. Raj Narain, (1975) 4 SCC 428.

<sup>3</sup> Mannion R, Blenkinsopp J, Powell M, McHale J, Millar R, Snowden N, Davies H., *Understanding the knowledge gaps in whistleblowing and speaking up in health care: narrative reviews of the research literature and formal inquiries, a legal analysis and stakeholder interviews*, VOLUME 6 ISSUE 30 HEALTH SERVICES AND DELIVERY RESEARCH Chapter 2 (2018), <https://www.ncbi.nlm.nih.gov/books/NBK519622/>

The concept of whistle blowing may take several shapes and forms. But ultimately, it is a task of surfacing some irregularities within the framework of an institution, public or private, which can actuate few proclivities in the attitude and perception of the whistle blower,<sup>4</sup> which may comprise, though not exclusively, the alternative of raising the issue in concern either informally or formally, or on the record or anonymously, or externally or internally.<sup>5</sup> Though the process of whistle blowing may comprise, within a single transaction, any combination of the modes aforementioned and it clearly suggests a predicament, popularly present and in existence, in any attempt or possible attempt to whistle blowing.

But this approach points out a more technical and narrow approach towards the issue of whistle blowing. It is undeniable that the fecundity of whistle blowing comprises the ringing or raising the alarm regarding any blemishes, either intra or inter organizational level, but this approach of appending the presence of any institution within the discourse dilutes to a considerable degree, the scope of whistle blowing.<sup>6</sup>

It is a common attitude to equate the issue of protection of whistle blowers with that of the protection of witnesses. This attitude suggests the inherent inclination to infuse the institutional attitude of the entire legal regime regarding this discourse.<sup>7</sup> This attitude presumes, which maybe proper in most of the cases, though not in all cases that, the whistle blower must be an insider of the impugned institution, which invariably attract all the relevant walks of law in the centre pylon, which is the discourse or attempt to protect the whistle blower from the wrath of the concerned employer.

---

<sup>4</sup> J. P. Sharma, Sunaina Kanojia, Shikha Sachdeva, *Comparison of Whistle- blower Protection Mechanism of Select Countries* 11(1) INDIAN JOURNAL OF CORPORATE GOVERNANCE 45, 49-51 (2018).

<sup>5</sup> *Supra* note 3.

<sup>6</sup> Ruggero Scaturro, *Defining Whistleblowing* Research Paper Series No. 05 INTERNATIONAL ANTI-CORRUPTION ACADEMY (IACA) 2, 3,4,9,10,11 (2018).

<sup>7</sup> OECD, *Committing to Effective Whistleblower Protection* 25, 26, 40, 41 (OECD Publishing, Paris 2016).

It can be humbly submitted that this approach towards the protection of whistle blowers is the most common attitude in the legal plateaus, almost across the globe, which has led to the creation of policies regarding the protection of whistle blowers.<sup>8</sup>

The issue became more convoluted with the introduction of the private sectors within the regime of protection to whistle blowers, as this necessitates the recalibration of the statutory framework to cover the private sector undertakings within the umbrella of protection.<sup>9</sup>

This line of argument leads to the bifurcation of whistleblower protection laws into two possibilities, which are 'Stand Alone Laws' and 'Sector Based Laws'.<sup>10</sup>

In this context, the Whistle Blower Protection Act, 2014,<sup>11</sup> does not provide in its present form any definition of the terms 'whistle blower' or 'whistle blowing'. The nearest possible definition provided under this legislation is 'Disclosure', which means a complaint inter alia about, attempt/commission of corruption under the relevant provisions of the Prevention of Corruption Act, 1988, causing loss to the government; or, misuse of power, wrecking of discretionary powers causing loss to the government; or, commission/attempt of any criminal offence by a public servant.<sup>12</sup>

---

<sup>8</sup> Gillian Faichnie & Wendy Addison, *The Case For Whistleblower Protection*, THOMSON REUTERS 1, 6 <https://mena.thomsonreuters.com/content/dam/openweb/documents/pdf/mena/white-paper/the-case-for-whistleblower-protection.pdf>.

<sup>9</sup> The protection of whistleblowers Challenges and opportunities for local and regional government, Public Ethics, 61, 62 (Congress of Local and Regional Authorities of the Council of Europe 2018).

<sup>10</sup> J. P. Sharma, Sunaina Kanojia, Shikha Sachdeva, *supra* note 4, at 50.

<sup>11</sup> Not yet implemented, but received the assent of the President of India on 9<sup>th</sup> Day of May, 2014, <https://thc.nic.in/Central%20Governmental%20Acts/Whistle%20Blowers%20Protection%20Act,%202014..pdf>. See also Raj Krishna, Alok Kumar, *The Whistle Blowers Protection Act and the Idea of Transparency*, SCC ONLINE TIMES (May 22, 2025, 10:00 PM), <https://www.sconline.com/blog/post/2025/04/25/the-whistle-blowers-protection-act-and-the-idea-of-transparency-2/>.

<sup>12</sup> The Whistle Blowers Protection Act, 2014, § 2(d), This statute has not been implemented yet.

This definition is again aligned with the institutional approach to the issue of whistle blower protection, which is nothing but a prominent example of ‘Sector Based Law’.<sup>13</sup> In this instant case, the sector is limited only to the public sector in the Indian legal fabric.

To decipher the incongruity, the legal regime of the United States of America (USA) as to the protection of whistle blowers must be taken into cognizance, and a careful scrutiny reveals that the prevalent legal regime in the United States of America (USA) comprises three enactments in the arena of whistle blower protection, viz.

- 1) *Dodd-Frank Wall Street Reform and Consumer Protection Act, 2010*<sup>14</sup>:- This is mostly concerned with the anomalies and the reporting of the same, in the financial domain.
- 2) *Sarbanes-Oxley Act, 2002*<sup>15</sup>:- This enactment is also connected with the protection of the company law regime and also with the solemn purpose to protect the investors.
- 3) *Whistleblower Protection Act, 1989*<sup>16</sup>:- This is the predominant piece of legislation which covers a catena of issues in the domain of whistle blower protection, like gross mismanagement, abuse of authority, dangers to health and safety, violation of law, etc.

Again, in contrast, the Public Interest Disclosure Act, 1998<sup>17</sup> takes a more ‘Stand Alone Law’ approach,<sup>18</sup> as this enactment of the United Kingdom (UK) canopies a plethora of issues like

---

<sup>13</sup> J. P. Sharma, Sunaina Kanojia, Shikha Sachdeva, supra note 4, at 52.

<sup>14</sup> The Dodd-Frank Wall Street Reform and Consumer Protection Act, 2010, PUBLIC LAW 111–203—JULY 21, 2010, <https://www.congress.gov/111/plaws/publ203/PLAW-111publ203.pdf>.

<sup>15</sup> LIBRARY OF CONGRESS, <https://www.congress.gov/bill/107th-congress/house-bill/3763/summary/35> (last visited on May 30, 2025). See also Michael W. Peregrine & Charles W. Elson, *The Important Legacy of the Sarbanes Oxley Act*, HARVARD LAW SCHOOL FORUM ON CORPORATE GOVERNANCE (June 2, 2025, 6:20 PM), <https://corpgov.law.harvard.edu/2022/08/30/the-important-legacy-of-the-sarbanes-oxley-act/>; Stephen Wagner & Lee Dittmar, *The Unexpected Benefits of Sarbanes-Oxley* HARVARD BUSINESS REVIEW (June 2, 2025, 6:20 PM), <https://hbr.org/2006/04/the-unexpected-benefits-of-sarbanes-oxley>.

<sup>16</sup> LIBRARY OF CONGRESS, <https://www.congress.gov/crs-product/R48318> (last visited on June 7, 2025).

<sup>17</sup> NATIONAL ARCHIVES, DEPARTMENT FOR DIGITAL, CULTURE, MEDIA AND SPORT, HM GOVERNMENT, <https://www.legislation.gov.uk/ukpga/1998/23/contents> (last visited on June 9, 2025).

<sup>18</sup> *Supra* note 3.

criminal offences, issues about health and safety, environmental concerns, corporate corruption and even miscarriage of justice. As this statute of the United Kingdom comprises several seemingly unconnected issues within its fold, it can be treated safely as a 'Stand Alone Law'. At the cost of repetition, it can be pointed out that it is a possibility, however distant, that any 'Stand Alone Law' approach may lead to the clogging of this entire discourse by the possible vexatious but fastidious whistles.

### **III) THE CONCOURSE BETWEEN THE RIGHT TO INFORMATION ACT, 2005 AND THE PROTECTION OF WHISTLE BLOWERS**

In order to delineate the localizer factor between the Right to Information Act, 2005<sup>19</sup> and the issue of whistle blower protection,<sup>20</sup> the purpose of the Right to Information Act, 2005<sup>21</sup> must not be overlooked, which are, inter alia, protection of civil liberties, ensuring accountability, more participative democracy, and the prize possession, the issue of transparency.<sup>22</sup>

It is pertinent to note that the Right to Information Act, 2005, defines the term 'Information' in the form and shape of materials, which includes records, email, memo, opinion, circular, orders, logbook, contract, reports, data, etc., among many others. But the only caveat is that, the information, public or private, must be within the access of the public authorities.<sup>23</sup>

This is actually a sporadic definition, because the closure scrutiny of the Right to Information Act, 2005,<sup>24</sup> reveals its 'government/public sector undertaking centric' nature, which is, though relevant in the Indian legal context, but is depleting rapidly, and the necessity to introduce the private sector within the purview of this Act is almost inevitable, sooner or later.

---

<sup>19</sup> The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

<sup>20</sup> Keeping in mind the 2014 legislation, though not yet implemented.

<sup>21</sup> The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

<sup>22</sup> Dr. Rambilas, *Role of Right To Information (RTI) in Strengthening our Democracy*, Vol (4), No. 3 INTERNATIONAL JOURNAL OF SCIENTIFIC & INNOVATIVE RESEARCH STUDIES 1, 3-4 (2016).

<sup>23</sup> The Right to Information Act, 2005, § 2(f), NO.22, Act of Parliament, 2005 (India).

<sup>24</sup> The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

But by no stretch of imagination, the discourse relating to the right to information can be divorced from the issue of whistle blower protection. But the silence of both the Right to Information Act, 2005<sup>25</sup> on one hand, and the proposed 2014 law on whistle blower protection<sup>26</sup> on the other hand, it necessitates the application of *NOSCITUR A SOCIIS*<sup>27</sup> and *TRAVAUX PREPARATOIRES*<sup>28</sup> on both the statute and the proposed legislation, which may have a catalyst impact behind the spawning progeny in the shape of whistle blower protection within the realm of the Right to Information Act, 2005.<sup>29</sup>

But the conundrum may exist in the arena of exempted categories of information as envisaged in Sec. 8 of the Right to Information Act, 2005.<sup>30</sup>

On the other side of the spectrum, the Official Secrets Act, 1923<sup>31</sup> stands just on the diametrically opposite side of this discourse, which makes a formidable barrier in the path of both the right to information and the protection of whistle blowers.<sup>32</sup>

The recent approach of Honourable Justice Sonia Sotomayor and Ketanji Brown Jackson of the Supreme Court of the United States of America (USA), while uploading the independence of the office bearers directly connected with whistle blower protection, at least indirectly,

---

<sup>25</sup> The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

<sup>26</sup> The Whistle Blowers Protection Act, 2014, § 2(d), this statute has not been implemented yet.

<sup>27</sup> VEPA P. SARATHI, INTERPRETATION OF STATUTE 121 (6th ed., EASTERN BOOK COMPANY, 2024). See also *Union of India v. ISRO Drivers Association*, (2020) 8 SCC 657, *Oswal Agro Mills Ltd. v. CCE*, 1993 Supp (3) SCC 176, *Chhattisgarh SEB v. CERC*, (2010) 5 SCC 23.

<sup>28</sup> VEPA P. SARATHI, INTERPRETATION OF STATUTE 297 (6th ed., EASTERN BOOK COMPANY, 2024). See also *Union of India v. Mohit Minerals (P) Ltd.*, (2022) 10 SCC 700, *Spentex Industries Ltd. v. CCE*, (2016) 1 SCC 780.

<sup>29</sup> The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

<sup>30</sup> The Right to Information Act, 2005, § 8, NO.22, Act of Parliament, 2005 (India).

<sup>31</sup> The Official Secrets Act, 1923, NO.19, 1923 (India).

<sup>32</sup> Raj Krishna, Alok Kumar, *The Whistle Blowers Protection Act and the Idea of Transparency*, SCC ONLINE TIMES (May 22, 2025, 10:00 PM), <https://www.sconline.com/blog/post/2025/04/25/the-whistle-blowers-protection-act-and-the-idea-of-transparency-2/>.



pointed out the underpinning issue of an impartial and ‘administrative system neutral’ approach towards whistle blower protection,<sup>33</sup> which is in consonance with the previous verdict of the same Supreme Court of the United States of America (USA), in the case of Department of Homeland Security v. Robert MacLean.<sup>34</sup>

The careful perusal of the recent verdicts of the Indian Supreme Court,<sup>35</sup> though mostly in connection with the issue of right to information, clearly suggest an information and knowledge centric behaviour of the Indian judiciary, which can be utilized palpably as a ground for creation of a jurisprudence, regarding the nexus between right to information and protection of whistle blowers, in a manner most suitable for the Indian context.

#### **IV) CONCLUSION**

To conclude the issue at hand, the observations of Honourable Justice P.N. Bhagwati (as he then was) in the case of S.P.Gupta v. Union of India<sup>36</sup> must be remembered, where His Lordship categorically observes that the right to know, under the Indian Constitution,<sup>37</sup> must mean only the knowledge of true facts.

This observation is being cited with affirmation in the Electoral Bond verdict<sup>38</sup> and particularly, the affirmative approach towards this observation by the then Chief Justice of Indian,

---

<sup>33</sup> The Guardian, US SUPREME COURT TEMPORARILY BLOCKS FIRING OF HEAD OF FEDERAL WHISTLEBLOWER PROTECTION OFFICE, <https://www.theguardian.com/us-news/2025/feb/22/supreme-court-blocks-firing-head-federal-whistleblower-protection-office> (last visited on June 9, 2025).

<sup>34</sup> U.S. OFFICE OF SPECIAL COUNSEL, <https://osc.gov/News/Pages/15-03-Supreme-Court-DHS-MacLean-Whistleblower-Protections.aspx> (last visited on June 11, 2025).

<sup>35</sup> Society for Enlightenment and Voluntary Action v. Union of India, [2024] 10 S.C.R. 1513; Central Information Commission v. D.D.A., [2024] 7 S.C.R. 617; HDFC Bank Ltd. v. Union of India, [2022] 13 S.C.R. 502; Dr Kavita Kamboj v. High Court of Punjab and Haryana, [2024] 2 S.C.R. 1136; Vijay Bahadur v. Sunil Kumar, [2025] 4 S.C.R. 11.

<sup>36</sup> 1981 Supp SCC 87.

<sup>37</sup> Specifically under Art. 19 (1) (a) of the Indian Constitution, because this judgment of the apex court came before the Right to Information Act, 2005, came into operation.

<sup>38</sup> Association for Democratic Reforms v. Union of India, [2024] 2 S.C.R. 420.

Honourable Justice Dr. Dhananjaya Y Chandrachud (as he then was) in the same Electoral Bond case,<sup>39</sup> clearly substantiate the knowledge-centric approach of the Indian judiciary, which is the single most important issue in the attempt to trail blaze the Indian jurisprudence on whistle blower protection.

The closer scrutiny of the prevalent whistle blower protection regime across the globe<sup>40</sup> and the careful perusal of the verdicts rendered by the apex court of India, especially in the cases of Samarpan Varishtha Jan Parisar v. Rajendra Prasad Agarwal<sup>41</sup> and Vidya Dhar v. Multi Screen Media Pvt. Ltd.<sup>42</sup> clearly resound the receptivity of the Indian judiciary (at least in the highest level of judiciary) towards a more comprehensive legal regime as to the issue of appending protection to the whistle blowers or the future possible whistle blowers.

Most notably, the verdict of the Supreme Court of India in the case of Common Cause v. Union of India,<sup>43</sup> where Honourable Justice Madan B. Lokur (as he then was) voiced the court's resolute stance, in favour of advancing protection of all possible kinds, to a whistle blower, arguably prescribed the law till date.

It can be humbly submitted that the aforementioned Common Cause verdict<sup>44</sup> diluted the rigour of the same apex court in the verdict of Manoj H. Mishra v. Union of India.<sup>45</sup>

In an answer given by the Honourable Minister of State, The Ministry of Personnel, Public Grievances and Pensions and Minister of State in the Prime Minister's Office, before the Rajya

---

<sup>39</sup> Association for Democratic Reforms v. Union of India, [2024] 2 S.C.R. 420.

<sup>40</sup> Shpresa Kaçiku Baljija & Kyoung-sun Min, *Evaluating the effectiveness of whistleblower protection: A new index*, 5:e-28 Data and Policy e-28-1, e-28-1 to e-28-13 (2023) doi:10.1017/dap.2023.20; See also Baljit Kaur, *International Perspective of Law Relating to Protection of Whistle Blowers*, Volume 5, Issue 4 JOURNAL OF EMERGING TECHNOLOGIES AND INNOVATIVE RESEARCH (JETIR) 19, 21-26 (2018).

<sup>41</sup> [2022] 3 S.C.R. 625.

<sup>42</sup> [2013] 5 S.C.R. 510.

<sup>43</sup> [2015] 6 S.C.R. 731.

<sup>44</sup> [2015] 6 S.C.R. 731.

<sup>45</sup> [2013] 5 S.C.R. 770.

Sabha, on 12/12/2024, the Honourable Minister pointed out that, the 2014 legislation on the whistle blower protection will be implemented, after carrying the required amendments in it.<sup>46</sup> It can be humbly submitted that the most required amendment lies not only in the arena of the 2014 legislation on whistle blower protection, but in the arena of the Right to Information Act, 2005,<sup>47</sup> because it is the information, procured or amassed, through the Right to Information Act, 2005<sup>48</sup> which can make the issue of whistle blowing a meaningful one, specifically in the arena of corporate governance<sup>49</sup> and the successful creation of a concourse between the issues of right to information and whistle blower protection pointed out a need-based legal regime.<sup>50</sup> At the cost of prolixity, it can be submitted that the definition of 'Disclosure' as provided in the proposed 2014 legislation shall be altered, to include the element of direct enforceability in the future amended version of the legislation on whistle blower protection, in order to minimize the impact of the 'complaint' element in this discourse, to maintain the anonymity of the whistle blower and the concomitant changes in the Right to Information Act, 2005 will ensure the security and safety of the possible whistle blowers in the future. The apparent dichotomy between Right to Information Act, 2005 and the issue regarding protection of whistle blowers, can be minimized, if not resolved, by a paradigm shift of both the legislations, one in existence

---

<sup>46</sup> UNSTARRED QUESTION NO. 2046, DIGITAL SANSAD, [https://sansad.in/getFile/annex/266/AU2046\\_QQpfXe.pdf?source=pqars](https://sansad.in/getFile/annex/266/AU2046_QQpfXe.pdf?source=pqars) (last visited on June 15, 2025).

<sup>47</sup> The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

<sup>48</sup> The Right to Information Act, 2005, NO.22, Act of Parliament, 2005 (India).

<sup>49</sup> Dr. U.M. Premalatha, *Whistle Blower and Protection Policy: A Therapy to Corporate Unscrupulous Practices*, Vol.2 Issue 4 ZENITH INTERNATIONAL JOURNAL OF BUSINESS ECONOMICS & MANAGEMENT RESEARCH 194, 195 (2012); See also Suelette Dreyfus, Reeva Lederman, A.J. Brown, Simon Milton, Marcia P. Miceli, Rachele Bosua, Andrew Clausen & Jessie Schanzle, *Human Sources: The Journalist and the Whistle-blower in the Digital Era*, 48, 50-53 JOURNALISM RESEARCH AND INVESTIGATION IN A DIGITAL WORLD (S Tanner & N Richardson ed., Oxford University 2013).

<sup>50</sup> Shah Samrudhee, *Whistle Blowing Mechanism In India, An Analytical Study* VOLUME 2 ISSUE 2 PIMPRI LAW REVIEW JOURNAL 1, 20-23 (2023).

and the other in the future, directed towards the path of securing information on one hand and on the other by prescribing a separate adjudication system, specifically tailored for the protection of the whistle blower, from the almost inevitable impending retaliation.