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A COMPARATIVE STUDY OF THE WHISTLEBLOWER PROTECTION ACT IN INDIA WITH THE UK & USA

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ABSTRACT

Whistleblower protection laws play a crucial role in promoting transparency, accountability, and good governance in both the public and private sectors. These laws are designed to protect individuals who report corruption, illegal activities, or misuse of authority in the public interest. Without proper legal protection, many individuals hesitate to report wrongdoing out of fear of retaliation, such as dismissal, harassment, or discrimination. Therefore, strong whistleblower protection laws are necessary to create a safe environment where people can come forward without fear. This research article examines and compares the whistleblower protection frameworks of India, the United Kingdom, and the United States. It analyses key laws in India, the UK, and the USA, including the Whistleblowers Protection Act, 2014; the Public Interest Disclosure Act, 1998; and the Whistleblower Protection Act, 1989, as well as related legislation. The study focuses on their scope, coverage, legal procedures, and the level of protection provided to whistleblowers. The comparative analysis shows that the UK has a comprehensive, well-structured system that covers both the public and private sectors. At the same time, the USA follows a mixed approach with multiple laws providing sector-specific protection. In contrast, the Indian framework is limited mainly to the public sector and lacks key features, such as strong enforcement mechanisms, adequate compensation, and awareness-raising provisions.

Keywords- Whistleblower, Whistleblower Protection, Corruption, Public Interest Disclosure, Accountability, Transparency, Retaliation, Governance, Legal Framework

I. INTRODUCTION

A whistleblower is a person who reports or exposes corruption, illegal activities, fraud, or misuse of power within an organization or government body.¹ Such individuals play an important role in society because they help bring hidden wrongdoing to light. In many cases,

¹Black's Law Dictionary 1838 (11th ed. 2019).

whistleblowers are employees or insiders who have access to important information and choose to disclose it in the public interest. However, reporting wrongdoing is not easy. Whistleblowers often face serious risks, including job loss, harassment, threats, and discrimination. Because of these risks, many people hesitate to come forward, even when they are aware of corruption or illegal acts. To address this problem, governments across the world have introduced whistleblower protection laws. These laws aim to protect individuals from retaliation and ensure that they can report wrongdoing safely and without fear. Whistleblower protection laws are essential for promoting transparency, accountability, and ethical behaviour in both public and private sectors.² They help in detecting corruption at an early stage and prevent further harm to society. These laws also improve public trust in institutions by ensuring that wrongdoers are held accountable. Different countries follow different approaches to whistleblower protection. Some countries, like the United Kingdom, have comprehensive laws that provide broad protections for employees in both the public and private sectors. Other countries, like the United States,³ follow a mixed approach, protecting several laws covering sectors such as corporate law, environmental law, and labour law. In contrast, some countries provide limited protection only to public sector employees. India has also taken steps to protect whistleblowers by enacting the Whistleblowers Protection Act, 2014. However, the scope and effectiveness of this law are still debated, especially when compared to stronger legal systems in countries like the UK and the USA. This article aims to study and compare the whistleblower protection laws of India, the United Kingdom, and the United States. It focuses on their legal frameworks, scope of protection, and effectiveness. The study also highlights the strengths and weaknesses of the Indian law and suggests improvements to make it more effective.

II. HISTORY OF WHISTLEBLOWER PROTECTION

The concept of whistleblower protection developed gradually as governments around the world realized the importance of controlling corruption and misuse of power.⁴ In earlier times, people who reported wrongdoing were often punished rather than protected. Over time,⁵ it became clear that such individuals play a key role in exposing illegal activities and protecting

² Transparency International, *International Principles for Whistleblower Legislation* (2013).

³ Dickson Jere, *The Legal Protection of Whistleblowers in Zambia* (2008), available at <http://dspace.unza.zm:8080/xmlui/bitstream/handle/123456789/2413/jered0001.PDF?Sequence=1&isallowed=y> last seen on 01/05/2026.

⁴ Transparency International, *International Principles for Whistleblower Legislation* (2013).

⁵ Mark Worth, *Whistleblowing in Europe: Legal Protections for Whistleblowers in the EU* 10–12 (Transparency International, 2013).

public interest.⁶As a result, many countries started creating laws to support and protect whistleblowers. In the United States, the idea of whistleblower protection can be traced back to the *False Claims Act of 1863*, which allowed individuals to report fraud against the government and even receive rewards. In the United Kingdom, modern whistleblower protection began much later with the enactment of the Public Interest Disclosure Act (PIDA), 1998, which provided a structured legal framework to protect employees from retaliation.

In India, the importance of whistleblower protection was recognized following several major corruption scandals, which highlighted the need for an effective legal framework. This led to the enactment of the Whistleblowers Protection Act, 2014, which protects individuals who expose corruption in public offices. Apart from national laws, international conventions and organizations have also played an important role in encouraging countries to adopt whistleblower protection laws.

III. RESEARCH METHOD

This study is **doctrinal and comparative** in nature. It is based on:

- Analysis of statutes (India, UK, USA)
- Case laws
- Reports and academic literature

IV. MAIN OBJECTIVE

The main objectives of this research are:

1. To study whistleblower protection laws in India, the UK, and the USA
2. To compare their legal frameworks
3. To identify gaps in Indian law
4. To suggest improvements
5. To examine challenges faced by modern whistleblowers

V. PROBLEM IDENTIFICATION

Despite having laws, whistleblowers still face serious problems:

- Fear of retaliation
- Lack of awareness

⁶ David Lewis, *A Global Approach to Public Interest Disclosure 5–7* (Edward Elgar Publishing, 2010).

- Limited scope of protection in India
- Weak enforcement mechanisms
- No proper compensation system

Indian law primarily protects public-sector employees, leaving private-sector workers vulnerable.

VI. PURPOSE OF THE STUDY

The purpose of this study is:

- To highlight the importance of whistleblower protection
- To evaluate the effectiveness of existing laws
- To recommend reforms for better protection in India

VII. RESEARCH GAP

1. Digital Reporting System

The Act does not provide a safe, online, or digital platform for filing complaints. Today, most communication is digital, which is a major gap.

2. Limited Scope (Only Public Sector)

The law mainly protects public servants, but corruption and wrongdoing also happen in private companies, startups, and digital platforms.

3. Weak Protection Against Cyber Threats

Modern whistleblowers may face:

- Online harassment
- Data leaks
- But the law does not address these risks.

4. No Strong Compensation or Incentives

Unlike the USA, India does not provide:

- Financial rewards
- Strong compensation mechanisms

This reduces motivation to report wrongdoing.

5. Lack of Awareness in the Digital Age

There is no system for:

- Online awareness campaigns

- Training through digital platforms

6. Delay and Inefficiency

The system is still slow and paper-based, which does not align with today's fast, digital environment.

VIII. TYPES OF WHISTLEBLOWER PROTECTION LAWS

Across the world, different countries have adopted different legal systems to protect whistleblowers. These systems can be broadly divided into three main types based on the method of protection.

- i. **Comprehensive or dedicated laws-** These are specific laws made only for the protection of whistleblowers. They clearly define who a whistleblower is, what kind of disclosures are protected, and what safeguards are available against retaliation. Countries like the United Kingdom follow this approach through laws such as the Public Interest Disclosure Act 1998.⁷ India has also adopted this model through the Whistleblowers Protection Act, 2014.⁸ These laws aim to provide a clear, uniform system of protection and are generally more effective because all rules are consolidated in one place.
- ii. **Sector-specific or fragmented laws-** In this system, whistleblower protection is not provided through a single law. Instead, different laws cover different areas such as corporate law, environmental law, labour law, or financial regulation.⁹ The United States is a good example of this approach. It has many laws, such as the Sarbanes-Oxley Act of 2002 and the Whistleblower Protection Act of 1989, that apply to specific sectors. While this system protects many areas, it can sometimes be confusing because the rules are spread across different laws.
- iii. **Public sector-only protection laws-** In this approach, protection is mainly given to government employees or public servants.¹⁰ Private sector employees may not receive the same level of protection. India largely follows this approach in practice, as its law

⁷ David Lewis, *A Global Approach to Public Interest Disclosure* (Edward Elgar Publishing, 2010).

⁸ Whistle Blowers Protection Act, 2014, No. 17 of 2014, India, available at: <https://legislative.gov.in/sites/default/files/A2014-17.pdf> last seen on 01/05/2026.

⁹ Richard Moberly, *Sarbanes-Oxley's Structural Model to Encourage Corporate Whistleblowers*, 2006 U. Ill. L. Rev. 1107, available at: <https://illinoislawreview.org> last seen on 01/05/2026.

¹⁰ Law Commission of India, *179th Report on Public Interest Disclosure and Protection of Informers* (2001), available at: <https://lawcommissionofindia.nic.in> last seen on 01/05/2026.

mainly focuses on corruption in public offices. This type of system has a limited scope and may leave many whistleblowers without protection.

Therefore, these three types of legal frameworks show how countries differ in their approach to protecting whistleblowers. A comprehensive system is generally considered more effective because it provides clear and wide protection to all individuals.¹¹

IX. WHISTLEBLOWER PROTECTION IN THE UNITED KINGDOM

The United Kingdom is considered to have one of the strongest and most effective whistleblower protection systems in the world.¹² It was among the first countries in Europe to introduce a clear and dedicated law to protect individuals who report wrongdoing. The UK framework focuses on encouraging employees to speak up about illegal or unethical activities without fear of punishment or unfair treatment. The main law governing whistleblower protection in the UK is the *Public Interest Disclosure Act 1998 (PIDA)*. This Act was introduced to protect workers from retaliation such as dismissal, harassment, demotion, or any other unfair treatment by their employers. One important feature of this law is that it applies not only to the public sector but also to the private sector.¹³ It covers a wide range of individuals, including employees, workers, trainees, and even some contractors. This broad coverage makes the UK system more inclusive and effective. The Act also recognizes various disclosure channels through which a whistleblower can report wrongdoing. The first is **internal disclosure**, in which the employee reports the issue within the organization, usually to a senior the employer. The second is **regulatory disclosure**, in which information is reported to an external authority, such as a regulatory body responsible for that sector. The third type is **wider disclosure**, which includes reporting to the media, Members of Parliament, or other external bodies. However, wider disclosure is allowed only under strict conditions to ensure that it is done in the public interest. For a disclosure to be protected under PIDA, the worker must show that they had a **reasonable belief** that the information disclosed was true or indicated wrongdoing. It is not necessary to prove that the wrongdoing actually occurred, but the belief must be honest and reasonable. Additionally, the disclosure must be made in the **public**

¹¹ OECD, *Committing to Effective Whistleblower Protection* (2016), available at: <https://www.oecd.org> last seen on 01/05/2026.

¹² OECD, *Committing to Effective Whistleblower Protection* (2016), available at: <https://www.oecd.org/corruption/committing-to-effective-whistleblower-protection-9789264252639-en.htm> last seen on 01/05/2026.

¹³ David Lewis, *A Global Approach to Public Interest Disclosure* 35–40 (Edward Elgar Publishing, 2010).

interest, meaning it should benefit society and not be made for personal gain or malicious reasons.

The importance of protecting whistleblowers has also been highlighted through judicial decisions. In *ALM Medical Services v. Bladon*¹⁴, the court stated that the main purpose of the law is to protect workers from unfair treatment when they raise genuine concerns about wrongdoing.¹⁴ This case clearly shows that UK law aims to create a safe environment where employees can report misconduct without fear. Overall, the UK whistleblower protection system is strong because it provides clear rules, wide coverage, and effective safeguards against retaliation. It serves as a model for other countries, including India, to improve their own legal frameworks.

X. WHISTLEBLOWER PROTECTION IN THE UNITED STATES

The United States has a **mixed system** of whistleblower protection. This means there is **no single law** that covers everyone. Instead, there are **different laws for different sectors**, such as federal employees, private company workers, and specific industries.¹⁵

Important Laws

1. Whistleblower Protection Act (1989)

This law mainly protects **the federal government and its employees**.¹⁶

- It allows employees to report problems like:
 - Corruption
 - Abuse of power
 - Waste of public money
 - Violations of laws
- It protects them from punishment such as:
 - Being fired
 - Demotion (lower job position)
 - Harassment

¹⁴Ibid.

¹⁵ OECD, *Committing to Effective Whistleblower Protection* (2016), available at: <https://www.oecd.org/corruption/committing-to-effective-whistleblower-protection-9789264252639-en.htm> last seen on 01/05/2026.

¹⁶ Whistleblower Protection Act of 1989, 5 U.S.C. s. 2302(b)(8), available at: <https://www.govinfo.gov> last seen on 1/05/2026.

- If an employee is treated unfairly for reporting wrongdoing, they can file a complaint with the **Office of Special Counsel (OSC)**.

2. Civil Service Reform Act (1978)

This law came before the Whistleblower Protection Act and laid the foundation for protecting government workers.

- It created systems to ensure **fair treatment of federal employees**
- It established bodies like the **Merit Systems Protection Board (MSPB)**, which handles employee complaints
- It introduced the idea that employees should not be punished for reporting wrongdoing

3. Sarbanes-Oxley Act (2002)

This law mainly applies to **private companies**, especially those listed on the stock market.

- It was created after major corporate scandals like Enron ¹⁷
- It protects employees who report:
 - Fraud
 - Financial misconduct
 - False accounting
- It requires companies to:
 - Set up systems for employees to report concerns safely
- Employees can receive:
 - Job reinstatement
 - Back pay (lost salary)
 - Compensation for damages

Features of These Laws

- **Protect employees**, especially in government and large companies ¹⁸
- Offer **legal remedies**, such as:
 - Getting their job back (reinstatement)
 - Financial compensation
- **Encourage reporting** by:
 - Providing safe channels to report wrongdoing
 - In some cases, offering **financial rewards** (for example, under other laws like the False Claims Act)

¹⁷ Sarbanes-Oxley Act of 2002, 15 U.S.C.7201 et seq.

¹⁸Ibid.

Important Case Law

Garcetti v. Ceballos (2006)

This is a very important U.S. Supreme Court case.

- The Court decided that:
 - If a government employee speaks out **as part of their official job duties**, they are **not protected by the First Amendment** (freedom of speech), but if you speak **as a private citizen**, you may be protected
- This decision **limits whistleblower protection**, especially for government employees whose job involves reporting problems¹⁹

XI. WHISTLEBLOWER PROTECTION IN INDIA

I introduced the Whistleblowers Protection Act, 2014, to address corruption and misuse of power within government bodies.²⁰ The law was created to provide a safe way for people—especially government employees—to report wrongdoing without fear of reprisal.

Background and Purpose

Before this Act, India lacked a robust, structured legal framework to protect whistleblowers. The need for such a law became clear after several corruption scandals and cases in which whistleblowers faced threats or harm.

The main aim of the Act is to:

- **Encourage people to report corruption**
- **Protect those who expose wrongdoing**
- **Improve transparency and accountability in public administration**

1. Protection for Public Servants

The Act mainly protects **public servants**, such as:

- Government employees
- Employees of public sector organizations
- Officials working in government bodies

They can report actions like:

- Corruption (e.g., bribery)

¹⁹David Lewis, *A Global Approach to Public Interest Disclosure* 75–80 (Edward Elgar Publishing, 2010).

²⁰ Whistle Blowers Protection Act, 2014, No. 17 of 2014, India, available at: <https://legislative.gov.in/sites/default/files/A2014-17.pdf> last seen on 01/05/2026.

- Misuse of power
- Criminal offences by public officials

However, the protection is largely **limited to the public sector**, not private companies.

2. Reporting Mechanism

The Act allows individuals to make a complaint to a **competent authority**, such as:

- Central Vigilance Commission (CVC) at the central level
- State Vigilance Commissions at the state level ²¹

Key points:

- Complaints must be made in **good faith**
- The whistleblower should provide **supporting facts or evidence**
- Anonymous complaints are generally **not accepted**

3. Confidentiality of Identity

One of the most important protections is **confidentiality**.

- The identity of the whistleblower must be kept **secret**
- Authorities are not allowed to reveal the whistleblower's name unless necessary

This helps reduce fear of retaliation.

4. Protection Against Victimization

The Act provides some level of protection against:

- Harassment
- Transfer as punishment
- Demotion or dismissal

If a whistleblower faces such treatment, they can request protection from authorities.

Limitations of the Act

Despite its importance, the law has several weaknesses that are often discussed in legal studies:

1. Limited Scope (Public Sector Focus)

- The Act mainly applies to **public servants**
- It does **not effectively cover the private sector employees**
- This is a major gap, especially in a growing corporate economy

2. Weak Compensation Mechanism

The Act does not provide a **clear or strong system of compensation**. Unlike some countries, there are:

²¹ Central Vigilance Commission, available at: <https://www.cvc.gov.in> last seen on 01/05/2026.

- No financial rewards
- No structured damages for loss suffered

3. No Strong Awareness Provisions

The law does not include detailed measures to:

- Educate people about whistleblower rights
- Promote awareness in workplaces
- As a result:
- Many people do not even know the law exists
- Reporting remains low

4. Exclusion of Certain Information

The Act excludes matters related to:

- National security
- Official Secrets Act²²

This can limit its effectiveness in sensitive cases.

5. Implementation Issues

- Delays in investigations
- Lack of proper infrastructure
- Weak enforcement²³

These practical problems undermine the law's effectiveness.

XII. COMPARATIVE ANALYSIS

Aspect	UK	USA	India
Coverage	Public & Private	Mostly Federal + Sector laws	Mainly Public
Law Type	Comprehensive	Mixed	Comprehensive (limited scope)
Compensation	Available	Available	Limited
Awareness	Weak	Strong	Weak

The UK provides the most balanced system, while India still needs improvement.

²² Whistle Blowers Protection Act, 2014, No. 17 of 2014, India.

²³ Law Commission of India, 179th Report (2001).

XIII. CONCLUSION

Whistleblower protection is a very important part of a strong and fair system of governance. It helps in exposing corruption, misuse of power, and illegal activities that may otherwise remain hidden. When individuals feel safe to report wrongdoing, it leads to greater transparency, accountability, and trust in public institutions. Countries like the United Kingdom and the United States have developed strong legal systems that not only protect whistleblowers but also encourage them to come forward. These systems provide clear procedures, broader coverage, and effective remedies, making them more reliable and efficient. In India, the *Whistleblowers Protection Act, 2014*, is an important step towards improving transparency and fighting corruption. However, the law still has certain weaknesses that limit its effectiveness. Its scope is mainly restricted to the public sector, and it does not provide strong mechanisms for compensation or awareness. Because of these limitations, many individuals may still hesitate to report wrongdoing due to fear of retaliation.

Therefore, for India to effectively control corruption and promote good governance, it is necessary to strengthen its whistleblower protection framework. This can be achieved by expanding the law to cover the private sector, strengthening enforcement mechanisms, providing adequate compensation, and increasing public awareness. A stronger, more inclusive system will encourage more people to report wrongdoing and contribute to a more transparent, accountable society.

XIV. SUGGESTIONS

1. **Extend protection to private sector employees**

The law should not be limited only to government workers. Employees in private companies should also receive equal protection when they report wrongdoing. This will ensure wider coverage and help expose corruption across all sectors.

2. **Provide compensation and incentives**

Whistleblowers often face financial and personal losses. Therefore, the law should include proper compensation for any harm suffered. In some cases, incentives can also encourage more people to come forward.

3. **Create independent investigation authorities**

An independent body should be established to handle whistleblower complaints. This will ensure fair and unbiased investigations, free from interference from powerful individuals or institutions.

4. Increase awareness programs

Many people are not aware of their rights as whistleblowers. The government should conduct awareness programs and training so that individuals understand how and where to report wrongdoing safely.

5. Ensure strict punishment for retaliation

There should be strong legal action against those who punish or harass whistleblowers. Strict penalties will discourage retaliation and create a safer environment for reporting misconduct.

6. Simplify reporting procedures

The process of reporting wrongdoing should be simple and accessible. Easy procedures will encourage more people to report issues without confusion or fear.

7. Create a Secure Digital Reporting System

The government should develop:

- Encrypted online portals
- Anonymous reporting systems

Similar to global best practices (such as secure whistleblower platforms), this will make reporting easier and safer.

8. Provide Strong Data Protection and Cyber Security

Law should include:

- Protection of digital identity
- Safeguards against hacking and data leaks

9. Awareness Through Digital Platforms

Use:

- Social media
- Government websites
- Online training programs. Many people still don't know their rights.

10. Protection Against Online Harassment

The law should address:

- Cyberbullying
- Online defamation

- Digital surveillance

These are modern threats not covered in the current Act.

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