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Section: T03P06 Social Movements and their Influence on the Public Policy Agenda

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Working title: Whistleblowing from Below: Digital Media and the Influence of Civil Society Actors over the Implementation Phase of Anti-corruption Policies

Abstract: Social movement studies have dedicated a large share of their efforts in assessing the influence of collective action over processes of policy-making and political change. Similarly, anti-corruption studies have investigated the role of civil society initiatives in obtaining anti-corruption policy results. These perspectives have recently crossed their paths to investigate grassroots anti-corruption initiatives. However, despite the attention devoted to the political consequences of this form of activism, contributions in these fields have seldom extended their analysis to the mediating role that civil society actors play over the implementation of these new policies, a role increasingly fostered by the strategic use of digital media. The ubiquitous presence of digital media that affected contemporary societies also has an impact on activists’ repertoire of practices. For this reason, this article aims at adding the media perspective to this literature. To fill these gaps, this study focuses on the whistleblowing process, framed as an anti-corruption practice that exposes institutional wrongdoing from below. Drawing on an interdisciplinary theoretical framework that bridges corruption and movement studies with media studies, the present contribution aims at exploring the influence of civil society actors over the implementation phase of anti-corruption policies through the analysis of their use of digital media.

Based on this background, the study answers two research questions: 1. What is the role of digital media in the creation and development of whistleblowing initiatives from below; 2. How the strategic use of whistleblowing technologies by civil society actors impacts on the implementation of the whistleblowers’ protection act. Building on a qualitative research design, the analysis compares three whistleblowing initiatives: 1. Linea Libera (LL), a hotline and email inbox for potential whistleblowers, conceived by the anti-mafia association LIBERA; 2. ALAC, Advocacy and Legal Advice Centre for whistleblowers based on the GlobalLeaks software, jointly provided by Transparency International (TI-It) and Hermes Center for Transparency and Digital Human Rights (HC); 3. Whistleblowing PA (WBPA), a digital whistleblowing platform for public administrations developed by TI-It and HC.

Keywords: Social Movements, Influence, Anti-corruption, Whistleblowing, Digital Media
1. Introduction

Studies on the consequences of social movements have blossomed over the last decades. Among others, policy outcomes have certainly attracted the lion’s share of scholars’ attention, being disproportionately investigated when compared to the biographical, cultural, or social effects of social movements (Amenta, Andrews, & Caren, 2018; Amenta & Polletta, 2019; Earl, 2000, 2004; Giugni, 1994, 2008; Giugni & Grasso, 2016; Van Dyke & Taylor, 2018). However, for the most part, studies on the influence of social movements on policy change have remained anchored in the first steps of the policy process, namely agenda-setting, policy contents, and policy passage (Amenta, Caren, Chiarello, & Su, 2010). Studies over the implementation of policies are instead scarcer. The reason for this underrepresentation is twofold. On the one hand, part of the scholarship agrees on the fact that movements’ influence is greater over the first phases of the policy process (Andrews & Edwards, 2004). On the other hand, studying the contribution of social movements to the implementation phase seems to multiply the numerous methodological and analytical challenges that characterize the outcomes subfield of study (Earl, 2000). This is even more relevant when considering the anti-corruption fields, where recent contributions have pointed at the pivotal role that civil society organizations and movements may obtaining relevant policy results in the anti-corruption sphere (Grimes, 2008, Mungiu-Pippidi 2015). However, it is still unclear how grassroots efforts may serve to the implementation of these policies.

Social movement scholars, as well as activists, are well aware of the importance of influencing the implementation phase to impact the social reality (Amenta et al., 2010). Whereas securing favorable policies represent a crucial goal for social movements’ recognition, what matters, in the end, are the effects of a certain piece of legislation, given the fact that the very aim of social movement is indeed to change the social reality (Rutch, 1992). Thus, whereas acceptance and new advantages constitute crucial forms of success (Gamson, 1990 [1975]), they represent only a point outcome, over a longer route to social change (Jasper, Forthcoming). In this sense, the implementation phase is a moment of crucial contentious interaction between the political elites and the civil society actors. How a policy is implemented may indeed magnify or hinder movements’ instances of change.

The phase of policy implementation is thus crucial to ensure substantive rather than symbolic policy outcomes (Andrews & Edwards, 2004). However, checking the translation of policy principles into actual procedures may require a high level of professionalization. As a consequence, influence over the phase of policy implementation would mainly depend on organizational elements, such as the control over relevant resources and expertise, rather than on political conditions or framing processes. This article maintains that the phase of policy implementation is, therefore, more likely to be
influenced by technology-oriented and product-oriented social movements (TPMs), namely collective actors that promote social change through the transformation in the technologies or products and in the policies to which these are associated (Hess, 2005). Starting from this background, this study aims at furthering the debate on the relationship between social movements and influence over the phase of policy implementation. To do so, it focuses on the role of digital media, conceptualized as relevant resources in the hands of civil society actors, securing influence over the implementation phase.

To do so, this work focuses on the policy implementation of a relevant anti-corruption policy in Italy, namely the whistleblowers’ protection act. The anti-corruption arena qualifies as a good terrain to explore the relationship between influence and digital media, given the increasing attention that scholars are dedicating to the role of technologies in fostering the emergence and success of grassroots anti-corruption mobilizations (Mattoni, 2021). This seems even more important for what concerns whistleblowing regulations, which increasingly rely on digital platforms and encrypted services to enhance the safety of informants (Di Salvo, 2020). Based on this background, the study answers two research questions: 1. What is the role of digital media in the creation and development of whistleblowing initiatives from below; 2. How the strategic use of whistleblowing technologies by civil society actors impacts the implementation of the whistleblowers’ protection act. Building on a qualitative research design, the analysis compares three whistleblowing initiatives: 1. Linea Libera (LL), a hotline and email inbox for potential whistleblowers, conceived by the anti-mafia association LIBERA; 2. ALAC, Advocacy and Legal Advice Centre for whistleblowers based on the GlobalLeaks software, jointly provided by Transparency International (TI-It) and Hermes Center for Transparency and Digital Human Rights (HC); 3. Whistleblowing PA (WBPA), a digital whistleblowing platform for public administrations developed by TI-It and HC.

2. Literature review

2.1. Policy outcomes and the implementation phase

The political consequences of social movements represent the most populated area of contributions within the outcome subfield (Amenta et al., 2018; Amenta et al., 2010; Amenta & Polletta, 2019). Political consequences are generally defined as “those effects of movement activities that alter in some way the movements’ political environment” (Giugni, 2008, p. 1583). Political change thus entails both policymaking and policy transformation, but also -at a broader level- institutional change. Among these areas, studies on policy change outnumber contributions to politics and institutional transformations (Bosi, Giugni, & Uba, 2016). More specifically, most of the studies on the
consequences of social movement activities have been concentrated on successful cases of political change, a further specification of political outcomes (Earl, 2000). Contributions have thus focused on identifying the factors responsible for movements’ impact over the political realm. This first generation of studies has been particularly concerned with the idea of tying success to movement-controlled factors such as organizational aspects (Gamson, 1990 [1975]), or actors’ repertoires of action (Piven & Cloward, 1979). With time, criticisms on the subjectivist nature of success have contributed to shifting analyses to the role of contextual factors. This second generation of studies thus heavily relied on the political process model, stressing the pivotal role of the opportunity structure in determining the consequences of social movements (Deng, 1997; Meyer & Whittier, 1994; Staggenborg, 1995; Suh, 2014). However, criticisms against the overly deterministic stance of the political process model have brought to the elaboration of conciliatory perspectives, which move towards a more dynamic understanding of processes of social change (McAdam, Tarrow, & Tilly, 2001), trying to reconcile movement-centered and context-dependent explanations (Amenta, 2008; Amenta et al., 2010; Amenta, Caren, & Olasky, 2005; Giugni, 2007; King, 2008). More recently, scholars are trying to move a step forward, trying to go towards interactionists, processual, and relational explanations. At the same time, studies on the political consequences of social movements have been differentiated based on the type of political outcome under investigation. Typologies have therefore been distinguished based on the degree of political responsiveness (Schumaker, 1975), on their temporal duration (Jenkins, 1983), on different political scales (Kitschelt, 1986), on the beneficiaries of political change (Amenta & Young, 1999). The interaction between different analytical approaches and conceptualizations of political consequences has thus led to the creation of a rich array of concepts and factors able to explain the political effects of mobilization.

Focusing on the policy process it is possible to distinguish between four phases: i) agenda-setting, ii), the definition of policy contents, iii), policy passage, iv) policy implementation (Amenta et al., 2010). According to the existing scholarship, the influence of social movements and advocacy organizations tends to be higher over the first three phases (Amenta et al., 2010; Andrews & Edwards, 2004). The agenda-setting stage is generally considered the easiest to influence (Bosi et al., 2016), even though grassroots advocacy would be a priori constrained by the activity of professional lobbyists who reduce the alternatives at stake at the early stage of agenda definition (Berry, 1999). The participation in processes of decision-making would depend on the existence of personal ties of cooperation with the political elites (Diani, 1997), the characteristics of the political context (Kriesi, Koopmans, Duyvendak, & Giugni, 1995), or the strategies followed by targets (Walker, Martin, & McCarthy, 2008). Finally, the influence on the policy adoption would be greatly influenced by the degree of public opinion support (Burstein, 1999; Burstein, Einwohner, & Hollander, 1995), as from the
endorsement of other relevant players, as political parties and interest groups (Burstein & Linton, 2003).

On the contrary, the implementation phase has received less academic attention (Amenta et al., 2010). This has been partly motivated by methodological concerns. Whereas the policy arena is generally considered the easier to access and investigate in terms of data availability, this is not always true for all the phases of policy-making (Amenta et al., 2018). Nevertheless, even when considered, the influence of social movements over the phase of policy implementation has been generally considered as very limited (Andrews & Edwards, 2004). However, in contradiction with the idea that collective action runs out its potentiality of change within the agenda-setting stage (Amenta et al., 2010; Bosi et al., 2016; Soule & King, 2006), recent contributions have underlined that the action of movements can also contribute to enhancing the quality of progressive policies, to the extent that movements move beyond protest “to engage political processes more directly” (Amenta & Elliott, 2019, p. 568).

Starting from this background, the present study focuses on the implementation phase of the policy process. The argument builds on the idea that different phases of the policy process may be influenced by different factors (Andrews & Edwards, 2004). In the case of the implementation phase, a higher degree of expertise and professionalization might be required (Andrews & Edwards, 2004), with movements being forced to find new ways to engage in the policy process beyond protest (Amenta & Elliott, 2019). For this reason, this work maintains that the strategic control over resources as expertise and technological infrastructure is particularly relevant over the implementation phase. In particular, it builds on the concept of technology-oriented and product-oriented movements product-oriented social movements (TPMs), namely collective actors that promote social change through the transformation in the technologies or products and in the policies to which these are associated (Hess, 2005). In this case, are considered as TPMs those actors that, beyond advocating for a new piece of legislation, mobilize through the creation of products and services through which implement a transformation at the policy level. To better conceptualize the relationship between TPMs and policy implementation the next section introduces the broader relationship between media and social movements.

2.2. Media as resources

Over the last decades, grassroots struggles against corruption have become more and more relevant across the world, ranging from small-scale efforts to large-scale demonstrations (Mattoni, 2021). Digital media are perceived as “a game-changer” (Earl and Kimport, 2011), that implies changes and challenges almost at the organizational level (Bennet and Segerberg, 2013). Moreover, the use of
digital media may impact movements’ repertoire of contention (Tilly and Tarrow, 2006) and on their related repertoires of communication (Mattoni, 2013). To reinforce this trend, grassroots tech activists are often regarded as new actors (Hintz and Milan, 2009), framed as “bridges” (Heaney and Rojas 2014) that could foster digital participation and democratic innovation (Talpin, 2015). Digital media, moreover, could imply positive changes in terms of support for organizations and their protests (Bennet and Segerberg, 2013), change in the patterns of visibility for social movements (Uldam, 2018), contribute to the formation of collective identities (Kavada, 2015), and support the diffusion of mobilization (Rone, 2020).

Digital media appear to have a prominent role in shaping social movements’ chances of contributing to processes of political change (James, 2014, Richez et al. 2020, Earl, 2016). However, few contributions have tried to investigate the ways in which the use of technology fosters social movement outcomes (Romano & Sabada, 2016). On the contrary, this strand of research appears highly promising, particularly when considering the fact that digital media can be conceptualized as outcomes of social movements in their own right (James 2014, Romanos & Sabada, 2016, Weisskircher, 2019). However, as in most studies on the influence of social movements on policy change (Amenta, Caren, Chiarello, & Su, 2010), analyses on the relationship between movements, media, and outcomes have remained anchored in the first steps of the policy process, namely agenda-setting, policy contents, and policy passage on the one hand, and the production of technologies on the other. Studies over the implementation of policies are instead scarcer, with technology-oriented movements being generally considered to have limited results, “a mixture of success and cooptation” (Hess 2005, p. 164), a contribution that is generally limited to the production of technologies. However, the impact of technology-oriented movements may fall well beyond the sole production of media outlets, having relevant consequences on movements’ activities and possibilities of influencing the social reality. Bottom-up anti-corruption struggles qualify as a relevant example in this sense. Here, digital media may play a two-fold role, raising awareness of corruption and facilitating its understanding as a collective action problem (Mattoni, 2021).

Digital media thus represent pivotal material resources, through which generate structured anti-corruption infrastructures. To investigate the relationship between social movements, digital media, and outcomes this paper focuses on a specific process within the anti-corruption toolkit, namely the process of whistleblowing. Whistleblowers play a major role in preventing corruption at all levels, particularly in the public sector (Bernstein & Jasper, 1996). The process of whistleblowing qualifies as a relationship between an agent who discloses information on suspicious or illicit organizational practices, and a target who should be able and willing to address such misconduct. Acts of information
disclosure directed to targets within the organizations are defined as internal, whereas external whistleblowing refers to every act of disclosure happening outside the organization (Chiasson, Johnson, & Byington, 1995). In the case of external whistleblowing, the recipient is generally a collective actor, either an institution, an organization, the media, or a social movement. However, the relationship between whistleblowers and these collective actors has seldom been investigated. The crucial role played by collective actors vis-à-vis whistleblowing practices is identified in definitions of whistleblowers, from Near’s and Miceli’s famous definition (1985), passing through Jubb’s refinement (1999), till more recent contributions that highlight the crucial role of digital platforms developed through the merge efforts of civil society organizations and tech actors (Asiimwe et al. 2013, Di Salvo 2020; Lam and Harcourt 2019 Noveck et al. 2018). Collective tech actors working in the whistleblowing arena, and their outcomes as GlobalLeaks and SecureDrop (Di Salvo, 2020, 2021), represent a relevant case of technology-oriented and product-oriented movements (Hess, 2005). They support whistleblowers building services that connect informants with institutional actors, using technological infrastructures framed as “the technological skeleton for whistleblowing phenomenon (Di Salvo 2020: 72).

Creating safer environments for information disclosure, these services may have relevant consequences at the political level. Building on the Italian case, the rest of this work thus regards whistleblowing digital media as relevant resources in the hands of civil society actors, through which bottom-up collective actors have been able to influence the implementation phase of the whistleblowers’ protection act.

3. Background Context

The Italian Whistleblowers’ Protection law was passed in 2017 (l. 179/2017), after two years of intense campaigning animated by three civil society organizations: Riparte il Futuro (RIF), Libera, and Transparency International Italia (TI-It). However, the process that eventually brought it to the law was firstly initiated by the action of TI-It back in 2009, firstly introducing the topic in the Italian public debate. The law saliency of the issue in the eyes of the public opinion and the limited availability of institutional and civil society partners significantly reduced TI-It’s possibility of obtaining a proper regulation of whistleblowing. However, the organization managed to lobby the back then technocratic government of Mario Monti. In 2012, an embryonal recognition of the whistleblower figure was thus introduced in the so-called Severino law (l.190/2012), even though it was not accompanied by any significant form of protection. Rather than conclusive, this represented a first step in the whistleblowing policy process.
The context changed significantly in 2013 with the remarkable success of the 5 Star Movement (5SM) in the general elections, which represented a watershed in the whistleblowing debate. The theme was indeed in line with the specific ideological background of the 5SM, and the civil society-oriented attitudes of its MPs favored the emergence of relationships of cooperation with TI-It. A first version of the bill was therefore drafted by TI-It and sponsored by the 5SM, which helped in popularizing the whistleblowing theme over its electoral base. However, after three years this first draft was still languishing, waiting to be discussed. The process accelerated at the end of 2016, when RIF and TI-It launched the campaign #voicesofjustice, intending to pass the bill before the end of the legislature. The repertoire of institutional lobbying thus coupled with traditional mobilizing strategies, ranging from the use of petitions, public demonstrations, and calls to action. The campaign obtained the endorsement of relevant institutional figures, which worked as institutional insiders to pressure the discussion and approval of the bill. During parliamentary debates, the original bill was greatly modified to accommodate the opposition of the back then governing Democratic Party (PD). After 8 years of mobilization, the whistleblowers’ protection law was finally approved by a large majority.

However, the law represented a political compromise that left unattended some of the initial requests of the civil society sector. Rather than demobilizing, some of the organizations involved have thus entered a new phase, seeking to influence the implementation of the bill. At this point, advocacy-oriented actors such as RIF have moved to a more peripheral position, while TI-It and the HC played the lion’s share in the implementation process. TI-It, HC, and Libera created whistleblowers-oriented services, ALAC and LL respectively. Whereas both services offer support and information to potential whistleblowers, TI-It and HC moved a step forward by developing their digital whistleblowing platform, offered to the public administration (PA) through the WBPA project.

4. Methodology

The analysis draws on a qualitative research design that combines interview materials with a short-term offline participatory observation. According to the exploratory nature of this paper, the paper combines two different methods into an integrated perspective: we have applied in an integrated perspective two different methods: the Thematic Analysis, TA (Braun 5 & Clarke V., 2006; Nowell et al. 2017) and the Situational Analysis, SA (Clarke A. et al. 2015, 2018).

4.1. Thematic and Situational Analyses: an integration

TA is a method for identifying, analyzing, and reporting patterns within data, through a recursive analysis that allows the emersion of “data-driven” or “theory-driven” codes, and the emersion of the
‘key’ themes embedded in the empirical material, which represent the main units of analysis (Braun and Clarke 2006). The TA allows generating maps to visualize the miscellaneous of candidate themes and sub-themes until the production of a final version, through several refinements. SA is an extension of the Grounded Theory (GT) method that focuses on the ecologies of relationships that exist between actors and elements that define a situation, the basic unit of analysis. This method is based on the creation of analytic maps: situational, relational, social arenas, and positional maps. The present work relies on situational and relational maps only. The situational map points out the key players that shape situations. Clarke et al. (2015, 2018) further distinguish between messy situational maps and ordered situational maps. The messy situational maps include all the elements that are part of the situation: from human to non-human, from individual to collective, from concrete to discursive elements (see Table 2, Appendix). Messy maps are drawn during the early stages of research, whereas their ordered version is produced immediately after by grouping the elements that emerged into ordered categories. Relational maps are instead produced starting from the messy situational map, capturing the various relations linking the situational elements – human and non-human. Here, the two analytical perspectives are combined to enrich the strengths and overcome the limits that characterize both methodologies.

Overcoming the methodological debates around TA as a crosscutting (Boyatzis, 1998; Holloway & Todres, 2003; Ryan & Bernard, 2000), rather than independent method (Braun and Clarke 2006, King, 2004; Leininger, 1992; Thorne, 2000), this work takes a mid-way approach, combining it with the SA. This serves both to integrate for the current lack of literature on TA when compared to other methods as GT (Nowell et al. 2017) and to balance the exploratory nature of SA’s maps with a more systematic analysis of themes that emerged throughout the empirical work. This would foster the capability of S.A. to go beyond the actions, focusing on the entire situation and its multiple complex elements, which are not merely contextual but conditional (Clarke, et al. 2015). Indeed, the SA highlights the role of non-human actors – as cultural objects, technologies, and media (Clarke, et al. 2015) in defining and shaping a “situation”, here represented by the Italian bottom-up whistleblowing initiatives. Similarly, the TA fits well with the interdisciplinary theoretical framework that characterized this research, offering an accessible and theoretically flexible approach to analyzing qualitative data that search for themes or patterns (Braun and Clarke 2006). Finally, both TA and SA consider the use of maps more than just tools to describe the case studies, but a preliminary data analysis stage that allows to point out relevant relations 6 according to RQs and objectives: in this research, the use of situational maps allow to point out the infrastructural elements represented by ICTs and digital platforms (van Dijck & De Waal 2018), whereas relational maps are used to conceptualize how the use of digital media shapes the configuration of the whistleblowing arena in
terms of power relations (Gillespie 2010) between collective actors involved in bottom-up and top-down whistleblowing practices. Framed as such, whistleblowing platforms could be considered as a change actor in terms of agents of media innovation (Di Salvo 2020), but also agents of digital activism (Earl et al. 2010).

4.2. Data Collection

The paper builds on 10 semi-structured interviews with 8 different interviewees. The data collection involves different categories of research participants. 4 interviews were conducted with representatives of LL, 2 with the spokesperson of the whistleblowing issue, 1 with the executive director of LL, and 1 with the two operators of LL. In the case of TI-It, these three functions are simultaneously covered by a single spokesperson, who was interviewed twice. 2 interviews were conducted with the co-founders of HC and developers of GlobalLeaks, the open-source software used by both digital whistleblowing platforms. Finally, we conducted an expert interview with an ex-member of the ANAC board, who currently collaborates with TI-It and Libera. The 10 interviews were conducted online through Zoom and Jitsi platforms, except for two in-person meetings, between December 2019 and May 2021. The interviews lasted between one hour and one hour and a half and were analyzed through the MAXQDA software. The data gathering process was forerun by a short-term offline participatory observation (30 September 2020 – 4 October 2020), at the “Scuola Common” convention, organized by Libera with the participation of almost all the main civil society organizations working in the anti-corruption field.

4.3. Data analysis

To take advantage of the flexibility of both methods and to systematize and increase the traceability and verification of our analysis, we point out a step-by-step guideline based on 8 stages (see Table 1), building on Braun’s and Clarke’s contribution (2006). All empirical data were analyzed through MAXQDA software. The maps were produced using the MAXMaps function. The main features of each stage are summarized in the following table:
Table 1. The 8 methodological stages, based on Braun and Clarke, 2006

<table>
<thead>
<tr>
<th>STAGE</th>
<th>Brief description</th>
<th>Main output</th>
</tr>
</thead>
<tbody>
<tr>
<td>(i)</td>
<td><strong>Descriptive stage</strong>: point out the main elements that define the situation (the case study)**&lt;br&gt;Create a messy situational map for each case study, based on:&lt;br&gt;- Desk research&lt;br&gt;- Interviews’ questionnaire&lt;br&gt;- Offline Participatory Observation: memos</td>
<td>3 messy situational maps</td>
</tr>
<tr>
<td>(ii)</td>
<td><strong>Empirical stage</strong>: Data gathering</td>
<td>10 interviews</td>
</tr>
<tr>
<td>(iii)</td>
<td><strong>Preliminary data analysis stage</strong>: transcription and memo’s&lt;br&gt;Preliminary data analysis through interviews’ transcriptions and memos (Braun and Clarke, 2006)&lt;br&gt;Revise messy maps and create relational maps (Clarke et al. 2015)</td>
<td>3 relational maps</td>
</tr>
<tr>
<td>(iv)</td>
<td><strong>Data analysis</strong>: Coding stage&lt;br&gt;Point out provisional codes, following the theory and data-driven processes (Braun and Clarke, 2006)&lt;br&gt;Create a code system through MAXQDA</td>
<td>Code system on MAXQDA</td>
</tr>
<tr>
<td>(v)</td>
<td><strong>Data analysis</strong>: Relational and thematic stage&lt;br&gt;Point out from the relational maps the main relational dynamics: strong-collaborative, weak-collaborative, conflictual; no relation&lt;br&gt;Point out the main themes</td>
<td></td>
</tr>
<tr>
<td>(vi)</td>
<td><strong>Data analysis</strong>: Thematic selection stage&lt;br&gt;Select the main relevant themes according to the following criteria: combine, refine, separate, discard (Braun and Clarke 2006)</td>
<td>Final maps: cfr. Map 1, Map 2, Map 3</td>
</tr>
<tr>
<td>(vii)</td>
<td>Point out from the final map the main findings: Finding stage</td>
<td></td>
</tr>
<tr>
<td>(viii)</td>
<td>From an abstract map: write down the critical analysis stage of the main findings</td>
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</tbody>
</table>

5. Findings

5.1 The main themes

The TA and SA have let emerge 5 different themes for ALAC and LL, and 4 for WBPA, visually shown through three main maps (see pp.13-14-15), one for each case study. Each map represents the analytical output generated through the different steps that compose the methodology framework that
we have adopted: more precisely the Maps 1-2-3 are the main results from the Thematic stage selection in which we merge the main results based on the S.A. with the major themes emerged through the T.A. (see Table 1, stage VI). In each map, we pointed out the main elements that define the “situation” (the case study), their relations, and the main themes that emerged through the analysis of the interviews’ materials.

In the case of ALAC and LL the themes are: (1) the tension between direct and digitally mediated forms of communication; (2) the recognition of the services by whistleblowers and authorities; (3) the role of relational dynamics; (4) the tension between supporting or being alternative to institutional actors; finally (5) the quest for institutionalization. In the case of WBPA, the 5th theme is represented by a tension between responsive vs unresponsive tech-infrastructures, where the digital component is considered as a means of support and literacy during the daily usage of the whistleblowing platforms. At the very center of these themes lies the technological dimension, labelled in the maps as non-human elements. The main five themes and related elements are depicted and briefly explained in the maps also through a specific legend.

The first theme is the tension between directed and digitally mediated forms of communication in the management of the different phases of the whistleblowing process, in the interactions within the potential whistleblowers or with the public administrations (see Maps 1-2-3, theme 1). Whereas both LL and ALAC are built around a technological infrastructure, being it a hotline or an encrypted platform, technologies impacted differently on the support for whistleblowers. For TI-It, an actor firmly positioned within the whistleblowing arena, the technological component is vital for managing and improving the quality of reports. The spokesperson of TI-It highlights the positive implications not just at the organizational level, but also in terms of security for whistleblowers:

“But it was all very uncoordinated, and we had to create a way that we could have some sort of relationship where we could dictate the rules of reporting to some extent. So, we decided to adopt encrypted computing platforms, because for us anyway the security for the fundamental.”, TI-It 1.

However, the less cross-cut anti-corruption profile of LL partly complicates the picture. The hotline is considered a poorly efficient entry point, receiving very few calls related to the whistleblowing activity and collecting several unrelated reports. This is strictly related to the second theme, namely the recognition of the whistleblowers-oriented services in the eyes of the public and of the authorities (see Maps 1-2-3, theme 2).
Map 1 - Linea Libera

**Map Overview**

- **Structural Elements**
  - Prevention, Sanctioning, Malpractice, Reporting, Denouncing
  - Whistleblowing: public (and private) sectors
- **Temporal Elements**
  - Government crisis Feb. 2021
  - Linea Libera
  - New Anac’s President
  - New Government
  - Political Subcultures
- **Human as Individuals Elements**
  - Whistleblowers
  - Whistleblowing law 2017
  - EU Directive
- **Socio-Cultural Elements**
  - Whistleblower - cultural stigma
  - Whistleblower - secrets
  - PA: Public authority
- **Spatial Elements**
  - Territorial/local dimension - Libera’s garrisons

**Main Entities**

- **Linea Libera**
- **Whistleblowers**
  - Former ANAC’s President
  - Former ANAC’s board member
- **Corruption Elements**
  - ANAC: Anti-corruption authority
  - Transparency International Italy
- **Political Elements**
  - New Anac’s President
  - New Government
  - Political subcultures
- **Public Resources**
  - Public prosecutor’s office
  - Court of Audits
- **Non-Human Elements**
  - Non-human actors, joint venture
  - Non-human actors, website
  - Non-human actors, messaging app
- **Human as Collective Actors**
  - Libera
  - Hermes Center

**Legend**

- **4 Types of Relations**
  - Strong collaborative relations
  - Weak collaborative relations
  - Conflictual relations
  - No relations

**5 Main Themes**

- **Theme 1:** Direct forms of communication vs digitally mediated
- **Theme 2:** Recognition of the service
- **Theme 3:** Role of relational dynamics
- **Theme 4:** Support vs Alternative
- **Theme 5:** The quest for institutionalization
Map 2 - ALAC

**Map's Legend**

4 types of relations (from Relational map)
- 1. Strong collaborative relations
- 2. Weak collaborative relations
- 3. Conflictual relations
- 4. No relations

5 main themes
- Theme 1: digitally mediated vs direct forms of communication
- Theme 2: Recognition of the service
- Theme 3: Role of relational dynamics
- Theme 4: Support and alternative
- Theme 5: The quest of institutionalization
The strong anti-mafia identity of Libera makes the hotline service less recognizable for potential whistleblowers, whereas the territorial embeddedness of the organization (see. map 1, spatial element) better fits the type of support that Libera is offering, as pointed out by the spokesperson of LL:

“Now we are thinking to try again to create more contacts in the area that are not branches, but that the representatives can perhaps do a first listen and then direct people to the Linea Libera operators in a more direct way.”, LL 1.

The centralization of communication through the technological infrastructure is thus perceived as a partial limit, a less efficient channel when compared to the territorial rootedness of the previous SOSGiustizia. The same interviewee also pointed out the necessity to transform the online service LL, taking advantage of Libera’s garrisons scattered in the main Italian regions:

“We are thinking about, let’s say, not now, but later on, trying to create more contacts in the area that are not branches, but that the territorial referents might be able to do an initial evaluation and then refer to the operators of Linea Libera in a more direct way.”, LL 1.

Conversely, the technological dimension of ALAC and WBPA is considered the strongest tool by TI-It and HC: perceiving the technological contribution not just as a tool for better and secure management of the communication practices, but as an infrastructure that enables the whistleblowing process. For both LL and ALAC, however, the offline interaction with informants is deemed essential to create a bond of trust and direct communication that, in turn, improves the quality of the reporting activities. This is true also for WBPA, where interpersonal interactions with public officials play a major role in securing the correct use of the platform.

However, technology is hardly the only resource at play. Indeed, the organizations’ reputational capital interacts with the technological sophistication of these services, shaping their influence over the implementation phase. This appears even more evident when considering the interaction between the second with the third theme: the relational dynamics within the whistleblowing arena. The blurred identity of Libera resizes the legitimation of its service by institutional actors so that Libera’s participation within the broader whistleblowing environment is mainly assured through the construction of positive relationships with single individuals within institutional bodies. On the contrary, the legitimation of TI-It as a pure anti-corruption actor grants the organization a structural role within the whistleblowing scenario. The quasi-monopoly over the whistleblowing platforms, firmly in the hands of TI-It and HC, served to enter as de-facto necessary partners, to the point that the same technological infrastructure is handed to ANAC. This is true also when considering the whistleblowers’ point of view. The vast array of activities brought about by Libera makes the hotline a hotspot for multiple audiences, failing in attracting its intended targets. On this point, the more
clear-cut image of ALAC and WBPA ensures a higher level of efficacy in reaching potential informants and interested PA. All these relational nuances are represented through the distinction of four main types of relations (see Maps 1-2-3, theme 3): strong or weak collaborative relations, conflictual relations, and finally no relations. These relational dynamics exist between the services - LL, ALAC, WBPA - and the human actors involved in the process of recognition.

The interaction between the technological component and the reputational capital of the organizations significantly shapes the relational dynamics among whistleblowing actors. As shown in the first map.1 (see Theme 4, weak collaborative relation), the positive but weak interaction of LL with single representatives within ANAC has ensured the organization an official recognition, through a collaboration agreement. However, the strong reliance on a relational strategy based on one-to-one personal connections has proven limitedly influential. On the contrary, the structural embeddedness of TI-It and HC, obtained through the creation of a dedicated whistleblowing platform, has served as a resource to change the organizations' structural positions vis-à-vis the institutional sector (see Map.2, theme 3). TI-It and Hermes have become service providers in the whistleblowing field, not just supplying a piece of technology but introducing in the field new standards and logic. However, as shown in map.3, the relation-through technology set in motion by the development and the control over technological resources has become a matter of confrontation between the civil society and institutional sector. Back in 2015, ANAC asked Hermes to design a whistleblowing platform for all the Italian PA. According to the Italian public procurement law, Hermes was however interdicted from the tendering procedure, being the designer of the platform. For this reason, it created a parallel joint-stock company, Whistleblowing solution, which was however excluded from the tendering. This event originated harsh contrapositions (see Map 3, theme 4) that ended up with HC suing ANAC for a violation of intellectual and industrial property rights through the development of the Open Whistleblowing platform (see Map 3, theme 4). This brought HC to elaborate a new strategy to influence the implementation process. The Co-founder of HC has defined the development of WBPA in these terms:

“So WBPA was born to checkmate the National Anti-Corruption Authority. For a wrong they have done to us.”, HC, 2.

TI-It and HC released WBPA, furnishing an alternative platform to the Italian PAs and thus intervening on the procedural aspects of the law to ensure its correct implementation.

Moving to the 4th theme, represented by the tension between support vs alternative – framed in terms of the nature of the whistleblowing service – LL, ALAC, and WBPA thus have a different understanding of their role in the whistleblowing process. Whereas all these services understand
themselves as a way of supporting both whistleblowers and institutions in the process of disclosing relevant anti-corruption information, as pointed out by LL:

“The activity of Libera is to collect reports, these are reports of subjects who have seen opaque or corrupt practices in their public workplace that do not concern them directly, but who want to report, because they are aware of it, to the anti-corruption authority which is ANAC”, LL 2.

ALAC and WBPA conceive their services as an alternative to institutional actors (see map 3, theme 4). Furnishing an alternative platform to the PAs, WBPA substitutes ANAC altogether, becoming a de facto competitor in the whistleblowing arena. The service is thought to improve the whistleblowing environment by imposing higher standards of safety and educating its users, the responsiveness theme (see Map 3, theme 5). Similarly, ALAC occasionally diverts reports to different institutional and non-institutional channels to increase the chances of impact (e.g., the press, see map 2, theme 3). Notwithstanding these differences, both LL and ALAC are interested in obtaining official recognition, asking for the institutionalization of their role of intermediaries in the process of whistleblowing, as in the case of LL:

"we can't do it, in the sense that we don't reach our target [...] I'm sure that there would be a completely different impact if we had this kind of recognition, that is, I think our work would increase, really, I do not exaggerate, but 100 times [...] You (ANAC) have to enable me and civil society to do it and then at that point I give those resources to anyone who has these criteria, so it is not that you have to choose us or Transparency or who knows who, but people with specific expertise, accredited, recognized, independent, capable.”, LL 1.

This serves to introduce the 5th theme, which deals directly with the adoption of the EU Directive from the Italian government, which might represent a window of opportunity for this recognition (see maps 1-2, theme 5).

5.2. Discussion and Conclusions

Whistleblowers-oriented services put in place by civil society organizations work as “X-intermediaries” (Loosen et. al 2020) in the whistleblowing process. Low- and high-tech infrastructural intermediaries are then defined starting from the control over technological and social resources, framed in terms of capital reputation. The interaction between types of intermediaries and themes that emerged allows us to draw some preliminary conclusions on the role of civil society actors in the implementation of the whistleblowers’ protection act in Italy, where high-tech intermediaries had a greater direct and indirect influence on the process of obtaining relevant procedural outcomes.

LL and ALAC act as intermediaries for potential whistleblowers in terms of bureaucratic and psychological assistance, whereas ALAC and WBPA provide the necessary digital platforms to
enable the whistleblowing process. This also means supporting the PAs in terms of tech literacy assistance during the adoption but also the daily use of the whistleblowing platform. Thus LL, ALAC, and WBPA qualify as necessary infrastructural intermediaries in the whistleblowing process, connecting informants and institutions through different technological infrastructures. LL represents a case of “low-tech infrastructural intermediary”, characterized by a scarce degree of technological sophistication, considered more as a limit than as an opportunity, and a high reliance on interpersonal connections both with informants and institutional actors. The lack of control over technological resources, the reliance on personal connections, and a self-interpretation of LL as ancillary to ANAC’s work has marginalized the role of Libera over the implementation phase (see Map 1, theme 3: conflictual relation). The lack of bargaining power has hampered the possibility of exerting any form of direct or indirect influence over the process.

ALAC and WBPA are instead a case of “high-tech infrastructural intermediary”, with TI-It and HC being crucial enablers in the whistleblowing process, as affirmed by the President of HC:

“Technology has its own enabling factor”, HC 1.

Besides representing technological outcomes per se, these platforms allow TI-It and HC to promote literacy on the whistleblowing theme in the PAs. Setting up whistleblowing platforms, TI-It and HC have strategically mobilized their digital resources to influence the implementation of the law. The President of HC said that:

“In essence, a procedural aspect can make the regulatory implementation work or completely sabotage the law”, HC 1.

The control over the digital infrastructure has allowed the civil society sector to guide the process, forcing institutional actors to follow their directions. ALAC has indeed become the gold standard to look at for implementing whistleblowing procedures, also at the transnational level, as affirmed by the President of HC:

“GlobalLeaks will be ALAC's platform for all Transparency chapters [...] for us, that is, it's a tremendous achievement since the initial goal was to make it easy to use and, ideally, it puts flags on all the countries of the world”, HC 1.

TI-It and HC have thus exerted a high degree of indirect influence over the whistleblowing process, generating processes of imitation and diffusion they forced institutional actors to comply with the new standards introduced by the civil society sector, as pointed out again by the President of HC:

"There are regulations on whistleblowing that pop up everywhere eh ... who do they turn to (the institutional actors) to acquire the expertise and understand how to implement their procedure? They turn to the first who did it. And if the first to do it are the anti-corruption NGOs of the country, they are talking to people who want to do well”, HC, 1.
This indirect influence is acknowledged both by the spokesperson of HC and of TI-It, at the national and international levels, as in the case of the indirect interplay between the Mexican government and the open-source software GL, briefly described by the Co-founder of HC:

"This is also very interesting: it is the impact that technology has on activists’ projects, on how public administrations work and we have been able to observe this a little bit in Italy, or even in Mexico. Put up a whistleblowing platform based on GlobalLeaks and what comes after a while? The Mexican government arrives and copies the site to it, makes a platform based on GlobalLeaks, makes an identical site, but precisely in terms of communication and replicates the exact model to receive the reports ", HC 2.

This is even more evident when considering the influence of WBPA. Furnishing technological services to the PAs, these organizations have rebalanced the asymmetry of power with institutional actors, exerting a high degree of direct influence on the implementation of the whistleblowers’ protection law. The control of valuable technological resources allowed TI and HC to create direct relationships with regulatory actors as ANAC and the PAs. Here, the control over the platform goes beyond the mere definition of standards, becoming a bargaining instrument through which forcing procedural refinements of the law upon the PAs, as affirmed by the spokesperson of TI-It:

"What pleases me, something of what I am very proud, is that we started it (the digital platform) and now it is mandatory for all institutions, it is mandatory, that is ANAC has done, and they practically do not consider anymore the reports receive in other ways", TI-It 1.

Not only TI-It and HC have introduced their logic and working method in the field, but they have also controlled the implementation of the norm by exerting sanctions upon reluctant PAs. This furnishes to the organizations a crucial power, as affirmed by TI-It’s spokesperson:

“Having this service, what do institutions do? They take it and maybe put it on the intranet. We do not see it published and we say: "but listen, you know that you cannot keep it on the intranet because the law says that employees and collaborators of supplier companies must also be able to report". And they say: "no but I want to keep it on the intranet". "Okay then I’ll turn it off and you buy it from a commercial supplier" and obviously then they put it on the internet because they don't want to pay. ", TI-It 1.

All in all, high-tech infrastructural intermediaries as TI-It and HC have obtained relevant procedural outcomes, guiding the process of implementation of the law and reaching important refinements for the whistleblowing process.

Right now, a new phase of mobilization has opened. The approval of European law on the whistleblowers’ protection is indeed forcing each member state to include or revise its whistleblowing legislation. This new opening of the political opportunity structure is furnishing to the civil society sector the chance to formalize what until today has been mostly won informally, as in the case of LL, and to institutionalize already legitimized services as for ALAC and WBPA. This could constitute an opportunity to expand the empirical research and address some of the limitations of this study. This
first exploratory analysis has indeed tried to bridge different strands of literature and different analytical approaches. However, the richness of the empirical material has hampered the possibility of going in-depth with the analysis of all the elements that have emerged, which are thus worthy of further investigation. At the same time, more work should be dedicated to better tie the empirical results with the theoretical hypotheses that underpin the analysis.

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