VMUN **2026**

Commission of Crime Prevention and Criminal Justice

BACKGROUND GUIDE

Vancouver Model United Nations
The Twenty-Fifth Annual Session | January 23rd-25th, 2026

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Dear Delegates,

My name is Iona Jiang, and it is my absolute pleasure to serve as the Director of the Commission of Crime Prevention and Criminal Justice at Vancouver Model United Nations 2026. Alongside my Chair Matthew Du and my Assistant Director Gurnoor Turna, we warmly welcome you to CCPCJ!

I still remember my first conference two years ago at VMUN 2024, crowded in an overwhelmingly large General Assembly where I barely spoke a single time. However, the adrenaline and passion derived from the MUN community warmly welcomed me to the world of diplomacy. From then onwards, I obtained countless fond memories of critical thinking and negotiation in the committee room. I hope all of you will leave this conference with equally positive experiences. Whether you are a first-time or experienced delegate, understand that MUN is not always about presenting the most polished speech or writing the perfect clause. Rather, it stems from the moments of breaking through your comfort zone to contribute meaningfully, whether that looks like raising your placard for the first time or stirring up debate with unconventional viewpoints. By attending this conference, you are joining a community of curious, driven individuals who believe in the power of diplomacy to propagate change.

At VMUN, CCPCJ will discuss the topics of Predictive Policing and Whistleblower Protection. I encourage you all to utilize the background guide to gain a general understanding of the topics; however, it is also advised that you conduct additional research to deepen your personal knowledge to foster fruitful debate in committee discussions!

If any questions or concerns emerge, please do not hesitate to contact me at ccpcj@vmun.com. I wish you all the best of luck in your preparations for the conference, and I look forward to meeting you all soon!

Sincerely,

Iona Jiang
CCPCJ Director

Position Paper Policy

What is a Position Paper?

A position paper is a brief overview of a country's stance on the topics being discussed by a particular committee. Though there is no specific format the position paper must follow, it should include a description of your positions your country holds on the issues on the agenda, relevant actions that your country has taken, and potential solutions that your country would support.

At Vancouver Model United Nations, delegates should write a position paper for each of the committee's topics. Each position paper should not exceed one page and should all be combined into a single document per delegate.

For CCPCJ, position papers, although strongly recommended, are not required. However, delegates who wish to be considered for an award must submit position papers.

Formatting

Position papers should:

— Include the name of the delegate, his/her country, and the committee

— Be in a standard font (e.g. Times New Roman) with a 12-point font size and 1-inch document margins

— Not include illustrations, diagrams, decorations, national symbols, watermarks, or page borders

— Include citations and a bibliography, in any format, giving due credit to the sources used in research
(not included in the 1-page limit)

Due Dates and Submission Procedure

Position papers for this committee must be submitted by **January 12, 2026, at 23:59 PT**. Once your position paper is complete, please save the file as your last name, your first name and send it as an attachment in an email to your committee's email address, with the subject heading as "[last name] [first name] — Position Paper". Please do not add any other attachments to the email. Both your position papers should be combined into a single PDF or Word document file; position papers submitted in another format will not be accepted.

Each position paper will be manually reviewed and considered for the Best Position Paper award. The email address for this committee is ccpcj@vmun.com

Predictive Policing

Overview

Predictive policing refers to the integration of algorithmic technologies—particularly artificial intelligence techniques such as machine learning—into law enforcement to anticipate potential criminal activity.[1] Unlike traditional policing methods that rely on reactive responses to reported incidents, predictive analytic tools analyze large datasets like historical crime records and individual behavioural data to locate crime-prone sites. For locations and individuals flagged as "high-risk," more police are deployed; conversely, sites with fewer crime rates see lower numbers of police patrol.[2] Although no country has implemented a national predictive policing program yet, AI has seen widespread integration into various predictive policing tools across the globe.[3] Advanced systems like PredPol in the United States and Integrated Joint Operations Platform in China demonstrate a trend toward expansive digital surveillance that fuses predictive algorithms with real-time biometric monitoring.[4] Since these early adoptions, several other countries like the Netherlands, South Africa, and Japan have developed or experimented with similar systems.[5]

While advancements in predictive policing are often praised for their improvement of resource efficiency for crime reduction, critics contend that they reinforce systemic inequalities by targeting marginalized communities, reflecting biases embedded in historical crime outcomes.[6] In the US, legal experts indicate that they could threaten civilian rights under the Fourth Amendment, which requires a justification of "reasonable suspicion" from the police agencies to prevent "unreasonable searches and seizures."[7] Predictive policing, however, loosens the criteria for suspicion by allowing police to justify searches and seizures based on historical data like crime mappings. In other jurisdictions, such as the Netherlands, algorithms like the System Risk Indication (SyRI) profiled individuals' personal data from various sources to uncover fraud, eventually being ruled in violation of anti-discrimination laws.[8] Moreover, in regions with underdeveloped digital infrastructure, such as parts of Sub-Saharan African and South Asia, implementation of predictive policing is challenged by limited access to reliable databases and a lack of digital literacy.[9]

As cities internationally expand their access to biometric and predictive software, debates around data transparency and civil liberties associated with biometric profiling have intensified.[10] Thus, it is of best interest

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[1] Tim Lau. "Predictive Policing Explained." Brennan Center, 1 April 2020, https://www.brennancenter.org/our-work/research-reports/predictive-policing-explained.

[2] Ibid.

[3] Bengüsu Özcan. "AI governance challenges part 3 | Proliferation." Centre for Future Generations, 18 October 2024, https://cfg.eu/ai-governance-challenges-part-3-proliferation/.

[4] Spandan Kar. "Predictive Policing Examples and Case Studies." IGNESA, 7 April 2025, https://ignesa.com/insights/predictive-policing-examples/.

[5] Lau, "Predictive Policing Explained."

[6] Ibid.

[7] "U.S. Constitution - Fourth Amendment | Resources | Constitution Annotated | Congress.gov | Library of Congress." Constitution Annotated, 15 December 1791, https://constitution.congress.gov/constitution/amendment-4/.

[8] Bekkum and Borgesius. "Dutch SyRI judgment."

[9] Galiani, Sebastian. "Predictive Policing in a Developing Country: Evidence from Two Randomized Controlled Trials." SSRN, 20 April 2022, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4080483.

[10] Lau, "Predictive Policing Explained."

that delegates of the CCPCJ formulate resolutions that maintain safeguards for predictive policing use while considering each nation's unique interests.

Timeline

1994 — The New York Police Department (NYPD) launches Compstat, the first major predictive policing program that uses past crime data to allocate policing resources; this is widely considered the foundation for modern predictive policing initiatives.[11]

May 2012 — The Los Angeles Police Department begins PredPol pilot program, focusing on burglary or vehicle-related crimes.[12] This resulted in a reported 13 percent drop in targeted crimes in tested zones compared to control zones.[13]

July 9, 2013 — The UN Special Rapporteur on the Promotion and Protection of Human Rights publishes a report expressing concerns over the growing state surveillance via digital technologies.[14]

April 16, 2014 — African Declaration on Internet Rights and Freedoms is adopted by a coalition of African civil society organizations associated with the African Declaration Group, underscoring their views in support of accountable algorithmic surveillance.[15]

December 14, 2016 — UN General Assembly adopts Resolution A/RES/71/199, reaffirming safeguards for digital privacy, ensuring emerging technologies do not infringe international human rights regulations.[16]

February 1, 2018 — Amnesty International exposes China's Integrated Joint Operations Platform for collecting data to surveil those of Uyghur dissent.[17]

May 25, 2018 — The European Union enforces the General Data Protection Regulation: a comprehensive set of data privacy laws to offer EU residents regulatory suggestions on handling personal data.[18]

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[11] Bureau of Justice Assistance. COMPSTAT: Its Origins, Evolution, and Future in Law Enforcement Agencies. Police Executive Research Forum, 2013.

[12] Bhuiyan, Johana. "LAPD ended predictive policing programs amid public outcry. A new effort shares many of their flaws." The Guardian, 8 November 2021, https://www.theguardian.com/us-news/2021/nov/07/lapd-predictive-policing-surveillance-reform.

[13] Lee, Sarah. "The Future of Crime Prevention." Number Analytics, 24 May 2025, https://www.numberanalytics.com/blog/future-of-crime-prevention#:~:text=A%20study%20by%20the%20LAPD,data%20quality%20and%20model%20accuracy.

[14] La Rue, Frank. "Report of the Special Rapporteur on the Promotion and Protection of the Right to Freedom of Opinion and Expression, Frank La Rue." Digital Library, 2013, https://digitallibrary.un.org/record/756267?v=pdf.

[15] Ibid.

[16] UN General Assembly. "The right to privacy in the digital age :." United Nations Digital Library System, 14 December 2016, https://digitallibrary.un.org/record/858023?ln=en&v=pdf.

[17] Daniel Sprick. "Predictive Policing in China: An Authoritarian Dream of Public Security." SSRN, 16 November 2020, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3700785.

[18] European Data Protection Supervisor. "Legal framework of EU data protection - European Commission." European Commission, https://commission.europa.eu/law/law-topic/data-protection/legal-framework-eu-data-protection_en.

February 5, 2020 — The Dutch court of The Hague orders the immediate shutdown of the System Risk Indication (SyRI) for violating article 8 of the European Convention on Human Rights concerning the "right to respect for private and family life, home, and correspondence."[19]

March 3, 2021 — Canada launches the mandatory Algorithmic Impact Assessment, becoming one of the first countries to require federal departments to complete the AIA before deploying predictive tools.[20]

November 1, 2021 — Cape Town begins to use ShotSpotter sensors, reportedly decreasing fatalities in gunfire incidents by 20 percent across the city in the first operational year.[21]

June 2023 — INTERPOL and UNICRI launch the Toolkit for Responsible AI Innovation in Law Enforcement, which offers law enforcement agencies to institutionalize responsible AI.[22]

May 2024 — The European Council passes the AI Act by a majority vote, which bans real-time predictive AI in public spaces unless under strict judicial oversight.[23]

Historical Analysis

Pre-Digital Era

Before the invention of predictive policing, public safety measures predominantly depended on reactive approaches to tackle crime. As recently as 1975, most police systems had limited capacity to target patterns in criminals; instead, they relied on the "Three Rs": randomized patrols, rapid responses to 9-1-1 calls, and investigations of post-crime scenes.[24, 25] The "Three Rs" approach encouraged police officers to remain attentive in response to criminal offenses that have already occurred, largely making up for their lack of computer infrastructure to accurately pinpoint crime sites.[26] However, this reactive approach also entailed initiatives such as spontaneously patrolling large areas deemed a crime risk based on data.[27] Many citizens were subject to over policing and bias against underserved racial or social groups.[28]

[19] Bekkum and Borgesius, "Dutch SyRI judgement."

[20] Kate Kaye. "AI Governance on the Ground: Canada's Algorithmic Impact Assessment Process and Algorithm has evolved." Montreal AI Ethics Institute, 3 February 2025, https://montrealethics.ai/ai-governance-on-the-ground-canadas-algorithmic-impact-assessment-process-and-algorithm-has-evolved/.

[21] Robin Francke,"Significant Drop in Gang-Related Hangover Park Shooting Incidents." Trending Online, 18 May 2025, https://trendingonline.co.za/index.php/2025/05/18/significant-drop-in-gang-related-hanover-park-shooting-incidents/.

[22] INTERPOL. "Artificial Intelligence Toolkit." Interpol, June 2023, https://www.interpol.int/en/How-we-work/Innovation/Artificial-Intelligence-Toolkit.

[23] "The EU Artificial Intelligence Act | Up-to-date developments and analyses of the EU AI Act." EU Artificial Intelligence Act, 12 July 2024, https://artificialintelligenceact.eu/.

[24] Sherman, Lawrence W. "The Rise of Evidence-Based Policing: Targeting, Testing, and Tracking." JSTOR, August 2013, https://www.jstor.org/stable/10.1086/670819.

[25] Ibid.

[26] Ethridge, Wendy. "The Importance of Evidence-Based Policing –SoundThinking." SoundThinking, 29 January 2022, https://www.soundthinking.com/blog/the-importance-of-evidence-based-policing/.

[27] Ibid.

[28] Ibid.

The Rise of Predictive Policing

The emergence of predictive policing is rooted in longstanding efforts to make law enforcement more accountable and proactive.[29] During the late 20th century, crime rates rose significantly due to major industrial shifts and urbanization.[30] This called for greater crime mitigation strategies in proportion to the increasing criminal activity.[31] Starting in the 1990s and 2000s, police innovators began digitizing crime records to identify patterns in criminal activity, moving away from reactive responses to crimes already committed toward anticipatory models capable of forecasting high-risk areas and individuals.[32]

In New York City, Mayor Giuliani and Commissioner William Bratton launched CompStat in 1994, a management system that requires precinct commanders to explain weekly trends on crime maps.[33] Later, in 2009, the Los Angeles Police Department (LAPD) received a 3 million USD federal grant to pilot hotspot prediction software PredPol.[34] Early police reports indicated sizable drops in crime activity: the LAPD claimed a 25 percent burglary reduction in one test area in 2012 compared to the previous year.[35] Across the US alone, a survey of 200 departments found that 38 percent were using predictive policing by 2014, with 70 percent stating that they were planning to implement similar technologies in the next two to five years.[36] This simultaneously encouraged states internationally to garner interest in these predictive technologies.[37]

However, concerns arose when Chicago adopted the Strategic Subject List (SSL), or "heat list" in 2013.[38] This was a database of individuals supposedly at high risk of gun violence, bringing greater awareness to the process of criminalization; however, many argued that the list had no clear crime-fighting benefit, rather compiling a list that contained virtually anyone who had been arrested or fingerprinted in recent years.[39] One particular example from Chicago involved Robert McDaniel, an African American man placed on a police heat-list for involvement with a shooting despite having no violent criminal records.[40] Instead, the algorithm flagged his location and racial identity as "high-risk" factors, leading to unwarranted police surveillance and interventions at his home.[41]

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[29] "The history of predictive policing in the United States." Medium, 29 May 2022, https://medium.com/@Vera_Kerber/a-brief-history-of-predictive-policing-in-the-united-states-ec3568e5c42c.

[30] Ibid.

[31] "Predictive Policing in the United States."

[32] Ibid.

[33] Ibid.

[34] Ibid.

[35] Ibid.

[36] Ibid.

[37] Tang, Jennifer, and Kyle Hiebert. "The Promises and Perils of Predictive Policing." Centre for International Governance Innovation, 22 May 2025, https://www.cigionline.org/articles/the-promises-and-perils-of-predictive-policing/.

[38] Hollywood, John S. "CPD's 'Heat List' and the Dilemma of Predictive Policing." RAND, 21 September 2016, https://www.rand.org/pubs/commentary/2016/09/cpds-heat-list-and-the-dilemma-of-predictive-policing.html.

[39] Ibid.

[40] Tanaka, Elizabeth. "Chicago PD Predictive Policing: "Heat List."" Open Casebook, 24 May 2021, https://opencasebook.org/casebooks/6141-tanaka-criminal-law-casebook/resources/3.4-chicago-pd-predictive-policing-heat-list/.

[41] Ibid.

Global Development in Predictive Policing

Internationally, predictive policing cases were varied.[42] In China's northwestern Xinjiang region, the region's authoritarian tendencies built the Integrated Joint Operations Platform (IJOP), which began around 2016.[43] IJOP is a mass surveillance network that ingests data from multiple databases, and CCTV cameras were used to identify individuals deemed high-risk for "extremism."[44] This particularly impacted Uyghurs who travelled to mosques, where they were under surveillance of police checkpoints so flagged individuals could be interrogated.[45] In many cases, flagged individuals were detained in detention camps for "re-education."[46]

Other earlier technologies in high-crime environments have also adopted data-driven tools.[47] In South Africa, particularly the city of Cape Town, a gunshot detection network called ShotSpotter was used.[48]
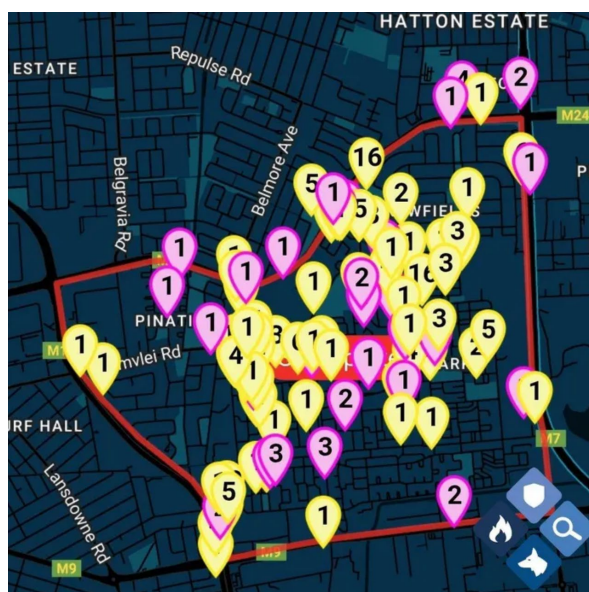

Figure 1: Gun violence cases detected on ShotSpotter throughout 28 days.[49]

Sensors installed across socioeconomically deprived neighbourhoods automatically triangulate the location of firearm discharges.[50] While beneficially helping the city recover hundreds of firearms and make arrests, it also contributed to an emergence of discussions pertaining to over-policing of marginalized communities.[51]

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[42] Lau, "Predictive Policing Explained."

[43] Wang, Maya. "China: Big Data Fuels Crackdown in Minority Region." Human Rights Watch, 26 February 2018, https://www.hrw.org/news/2018/02/27/china-big-data-fuels-crackdown-minority-region.

[44] Ibid.

[45] Ibid.

[46] Ibid.

[47] "Predictive policing: Navigating the challenges." Thomson Reuters Legal Solutions, 26 March 2025, https://legal.thomsonreuters.com/blog/predictive-policing-navigating-the-challenges/.

[48] Ruiters, Tracy-Lynn. "Cape Town's gun violence crisis: over 350 shootings in 28 days." *IOL*, May 2025, https://iol.co.za/weekend-argus/news/2025-05-12-cape-towns-gun-violence-crisis-over-350-shootings-in-28-days/.

[49] Ibid.

[50] Ibid.

[51] Malinga, Sibahle. "Cape Town resuscitates controversial crime prevention project." It Web, 15 December 2022, https://www.itweb.co.za/article/cape-town-resuscitates-controversial-crime-prevention-project/KzQenMjyYGy7Zd2r.

Past UN/International Involvement

UNHRC and OHCHR Involvement

The United Nations Human Rights Council (UNHRC) is an intergovernmental body responsible for addressing how emerging technology systems impact human rights standards.[52] In 2021, the Office of the High Commissioner for Human Rights (OHCHR) published thematic resolutions on its report titled *The Right to Privacy in the Digital Age*.[53] Acknowledging that AI systems, particularly those used as forecasting tools, the data sets used are profiled from large numbers of individuals, thus limiting their right to privacy."[54] The report also recommended a moratorium on the use of remote biometric recognition technologies in public spaces unless states can demonstrate compliance with data protection standards.[55] This is relevant to predictive policing as biometric data are often utilized as key data sources for predictive analytics. Data protection standards are further carried out through the Human Rights Impact Assessments (HRIAs) before predictive AI tools are deployed.[56] These HRIAs assess the technical accuracy and potential discriminatory effects on marginalized populations. The call for national-level data privacy legislation and assessments supports long-term systemic reform in the AI's compliance with international law.[57] However, the limitations of the UNHRC's involvement are that it lacks enforcement power, as adoption of these assessments depends on national governments; in addition, there are no standard methodologies for conducting HRIAs, leading to continued implementation gaps across member states.[58]

EU Involvement

Since May 2018, the European Union (EU) has fully enacted the General Data Protection Regulation (GDPR), a legal framework dedicated to standardizing and strengthening individuals' control over their personal data.[59] Such regulations determine how organizations collect, contain, and process data that are often used in predictive policing datasets. Article 22 notes that individuals have the right not to be subject to fully automated decisions with significant legal consequences.[60] Unless justified explicitly by the law, the use of biometric profiling is restricted, which constrains the scope of data available to predictive technologies.[61] National-level enforcement of these principles is observed through the 2020 decision in the Dutch District Court to strike down the Netherlands System Risk Indication (SyRI) program, which had attempted to identify potential fraud using

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[52] Ferré, Jean. "Explainer: What is the UN Human Rights Council?" UN News, 26 February 2024, https://news.un.org/en/story/2024/02/1146957.

[53] OHCHR. "The right to privacy in the digital age: report (2021)." OHCHR, 15 September 2021, https://www.ohchr.org/en/calls-for-input/2021/right-privacy-digital-age-report-2021.

[54] Ibid.

[55] UN General Assembly. "The right to privacy in the digital age:" United Nations Digital Library System, 14 December 2016, https://digitallibrary.un.org/record/858023?ln=en&v=pdf.

[56] Hoffmann, Dirk. "Introduction to human rights impact assessment." The Danish Institute for Human Rights, https://www.humanrights.dk/tools/human-rights-impact-assessment-guidance-toolbox/introduction-human-rights-impact-assessment.

[57] Ibid.

[58] Freedman, Rosa. "Failing To Protect: Systemic weaknesses within the UN human rights machinery." Universal Rights Group, 7 July 2014, https://www.universal-rights.org/failing-to-protect-systemic-weaknesses-within-the-un-human-rights-machinery/.

[59] European Data Protection Supervisor. "Legal framework of EU data protection - European Commission." European Commission, https://commission.europa.eu/law/law-topic/data-protection/legal-framework-eu-data-protection_en.

[60] European Union. "Art. 22 GDPR – Automated individual decision-making, including profiling - General Data Protection Regulation." GDPR, 25 May 2018, https://gdpr-info.eu/art-22-gdpr/.

[61] Ibid.

individual targeting based on socioeconomic status or migrant backgrounds.[62] The court ruled that the policing program violated Article 8 of the European Convention on Human Rights: "Everyone has the right to respect for his private and family life, his home and his correspondence."[63] Consequently, the SyRI program was suspended nationwide, reinforcing the relevance of the GDPR. Beyond strengthening this existing framework, this decision set a precedent for stricter provisions for future acts relating to the ethics of technology, such as the EU Artificial Intelligence Act.

Four years later, with the rapid increase of AI usage and its respective applications in predictive tools, the EU's AI Act was passed—the first legally binding cross-national regulation to govern AI surveillance systems.[64] It categorizes AI systems into three risk levels: unacceptable risk, high-risk, and minimal risk.[65] Unacceptable risk technologies are banned, and they include cognitive behavioural manipulation of specific vulnerable groups, like government-run social scoring that classify people's trustworthiness based on personal characteristics.[66] Article 5 of the act explicitly prohibits the use of AI that profiles individuals from criminal risk assessment based solely on personality traits or anticipated behaviours unless the analysis is directly linked to verifiable facts.[67] Accompanying this, the Act also bans real-time biometric identification in publicly accessible spaces unless authorized by a judicial or independent administrative body; exceptions to this policy are tightly restricted to serious crimes like terrorism or trafficking.[68] For high-risk technologies—such as CV-scanning tools that rank job applicants or diagnosing patients in healthcare services—are under strict regulatory oversight.[69] This categorization also considered AI in law enforcement, such as evaluating the reliability of crime analytics through audit requests, which could look like detailed documentation of the AI's performance.[70] Comparatively, AI at minimal risk are largely unregulated and include all other basic AI applications: spam filters, generative chatbots, games, simple photo editors.[71] Following the Act, national supervisor authorities were implemented in each member state, alongside a European Artificial Intelligence Board responsible for overseeing audit logs of AI usage in high-risk systems.[72] Penalties for non-compliance can culminate up to €35 million or 7 percent of annual worldwide turnover for companies.[73] Consequently, all policing programs for EU countries were required to keep fair audit logs of their performance.

INTERPOL Involvement

The International Criminal Police Organization (INTERPOL) is an international body that engages with predictive policing with a focus on integrating AI into transnational crime prevention as opposed to establishing

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[62] Bekkum and Borgesius. "Dutch SyRI judgment."

[63] Ibid.

[64] Foomany, Farbod. "Understanding EU AI Act Risk Categories." Security Compass, 7 August 2024, https://www.securitycompass.com/blog/understanding-eu-ai-act-risk-categories/.

[65] Ibid.

[66] Ibid.

[67] Baig, Anas. "Article 5: Prohibited Artificial Intelligence Practices | EU AI Act." Securiti.ai, 14 July 2024, https://securiti.ai/eu-ai-act/article-5/.

[68] Yakimova, Yasmina, and Janne Ojamo. "Artificial Intelligence Act: MEPs adopt landmark law | News." European Parliament, 13 March 2024, https://www.europarl.europa.eu/news/en/press-room/20240308IPR19015/artificial-intelligence-act-meps-adopt-landmark-law.

[69] Foomany, "Understanding EU AI Act Risk Categories."

[70] Ibid.

[71] Ibid.

[72] European Commission. "AI Board | Shaping Europe's digital future." EU, https://digital-strategy.ec.europa.eu/en/policies/ai-board.

[73] EU Artificial Intelligence Act. "Article 99: Penalties | EU Artificial Intelligence Act." EU AI Act, 2 August 2025, https://artificialintelligenceact.eu/article/99/.

stricter regulations.[74] The I-Checkit system, launched in 2015, uses predictive screening to help intercept transnational crimes, including trafficking, terrorism, and fraudulent documents.[75] The system operated by enabling private sector partners like airlines and shipping companies to cross-verify identity documents against INTERPOL criminal databases in real-time.[76] For participating airlines like AirAsia and Royal Caribbean, passengers' identity documents are submitted and validated according to AI-assigned risk scores.[77] This is generated based on the traveller's correlations with past trafficking networks or patterns in stolen IDs.[78] The database performed 3.6 billion searches in 2023, resulting in 232,423 positive matches associated with international arrest warrants or other suspected criminal activity.[79] The program is credited for intercepting multiple attempts at human smuggling in Asia-Pacific transits, making document fraud less susceptible of going undetected.[80] While these operational achievements significantly reduced passport fraud, critics contend that INTERPOL's reliance on risk scoring from private sectors lacks fair oversight.[81] This criticism is made on the basis of the staggering 69,000 Red Notices in circulation at the end of 2021, where data classification is often issued against refugees or known dissidents.[82]

Another INTERPOL project was Project Pandora, initiated in collaboration with the EU's Internal Security Fund.[83] This aimed to use vast data analytics to map the behaviours of organized criminal groups across Europe, North Africa, and the Middle East.[84] Using INTERPOL's Criminal Analysis Files, "risk heatmaps" are created and shared with border police officials.[85] In the ninth edition of this operation, customs authorities from 23 countries found 80 arrests and seized 37,727 trafficked items, such as archeological pieces, artworks, coins, and musical instruments.[86] Although detecting seizures is valuable, the operation remains reactive to larger criminal activity and disregards potential root causes, such as the illegal networks in the art market.[87]

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[74] INTERPOL. "What is INTERPOL?" Interpol, https://www.interpol.int/en/Who-we-are/What-is-INTERPOL2.

[75] INTERPOL. "I-Checkit." INTERPOL | The International Criminal Police Organization, https://www.interpol.int/en/How-we-work/I-Checkit.

[76] Ibid.

[77] INTERPOL. "Stolen and Lost Travel Documents database." Interpol, https://www.interpol.int/en/How-we-work/Border-management/SLTD-database-travel-and-identity-documents.

[78] Ibid.

[79] Ibid.

[80] Blenkey, Nick. "Carnival partners with INTERPOL on travel doc screening." Marine Log, 8 November 2016, https://www.marinelog.com/legal/safety-and-security/carnival-partners-with-interpol-on-travel-doc-screening/.

[81] Meacham, Sam, and Paul Apostolicas. "Weaponizing the Police: Authoritarian Abuse of Interpol." Harvard International Review, 11 April 2022, https://hir.harvard.edu/weaponizing-the-police-authoritarian-abuse-of-interpol/.

[82] "INTERPOL red notices." Corker Binning, 2025, https://corkerbinning.com/our-services/interpol-red-notices/.

[83] INTERPOL. "80 arrests and more than 37,700 cultural goods seized in major art trafficking bust." Interpol, 22 May 2025, https://www.interpol.int/en/News-and-Events/News/2025/80-arrests-and-more-than-37-700-cultural-goods-seized-in-major-art-trafficking-bust.

[84] Ibid.

[85] Ibid.

[86] OCCRP. "Europol Busts Global Ring Trafficking Stolen Artifacts." Organized Crime and Corruption Reporting Project, 22 May 2025, https://www.occrp.org/en/news/europol-busts-global-ring-trafficking-stolen-artifacts.

[87] Brodie, Neil, et al. "Why There is Still an Illicit Trade in Cultural Objects and What We Can Do About It." Taylor & Francis Online, 7 November 2021, https://www.tandfonline.com/doi/full/10.1080/00934690.2021.1996979.

Current Situation

Technological Capabilities and Ongoing Expansion

Over the past decade, predictive policing systems have significantly expanded their capabilities due to advancements in AI, machine learning, big data, and integration into mobile applications.[88] Proactive police patrolling has shown to reduce crime rates, with certain AI models predicting crime a week in advance with 90 percent accuracy.[89] In the US alone, the FBI reported a 15 percent drop in violent crime during early 2024, particularly in homicides and burglaries.[90] In early summer 2021, Dallas implemented a hot spot policing strategy that allowed officers to proactively deploy policing resources to high-risk areas, which reportedly resulted in a 14 percent reduction of violent street crimes on a city-wide level.[91] Comparatively, nearby cities Fort Worth and Arlington did not implement predictive policing to map out hot spots, resulting in a spike in violent crimes post-May 2021.[92] More specifically, these early crime predictions are supported by Early Intervention Systems.[93] They monitor officers' behaviour by analyzing complaints, incidents involving force, or hours overtime to identify patterns of particular stress.[94] Through proactively flagging the officers' patterns, agencies are able to provide targeted counseling, reassigning, and training to reduce the likelihood of biased policing. This is relevant to predictive policing because its effectiveness depends on both the accuracy of the algorithms but also the integrity in which the officers act on predictions. Beyond the situation in the Global North, in urbanized areas of the Global South, some policing tools have begun to rely on large-scale sensor networks or partially automated decision-making systems, such as South Africa's ShotSpotter using acoustic sensors to track gunfire locations.[95] China has also been viewed as a major driver in predictive technologies.[96] Surveillance systems manufactured by Chinese firms—namely Hikvision and Dahua—have been sold to several countries across Latin America, Africa, and Southeast Asia.[97] This reflects the international growing enthusiasm for predictive policing tools.

Data Profiling

While reforming technology successfully reduces crime rates, predictive policing continues to raise debates about the risk of data profiling for law enforcement in the 21st century.[98] In early 2023, the New York Times reported on a police technology conference in Dubai where "sentiment analysis software" is used to algorithmically infer someone's mood according to their facial expressions, which was marketed alongside Israeli hacking tools and Chinese facial recognition cameras.[99] Later the same year, Sheikh Hamdan bin Mohammed bin Rashid AI

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[88] Tang and Hiebert. "The Promises and Perils of Predictive Policing."

[89] Ibid.

[90] Milman, Oliver. "Violent crime in the US plummeted in first months of 2024, FBI data reveals." The Guardian, 11 June 2024, https://www.theguardian.com/us-news/article/2024/jun/11/violent-crime-rate-data-decline.

[91] Tregle, Brandon, and Michael R. Smith. "More than meets the eye: examining the impact of hot spots policing on the reduction of city-wide crime." Springer Nature Link, 22 March 2025, https://link.springer.com/article/10.1186/s40163-025-00247-9.

[92] Ibid.

[93] Christoff, Thomas, and Benjamin Carleton. "Buy-in for police early intervention systems: An initial exploration of what works." ScienceDirect, 30 March 2024, https://www.sciencedirect.com/science/article/pii/S004723522400028X.

[94] Ibid.

[95] Canino, Carlos. "Using Gunshot Detection: Where was ShotSpotter when I was a "Street Agent"? – SoundThinking." SoundThinking, 4 February 2025, https://www.soundthinking.com/blog/using-gunshot-detection-where-was-shotspotter-when-i-was-a-street-agent/.

[96] Sahin, Kaan. "The West, China, and AI surveillance." Atlantic Council, 18 December 2020, https://www.atlanticcouncil.org/blogs/geotech-cues/the-west-china-and-ai-surveillance/.

[97] Ibid.

[98] Tang and Hiebert. "The Promises and Perils of Predictive Policing."

[99] Ibid.

Maktoum attended an event to launch a citywide Genome Centre within the law enforcement's General Department of Forensic Science and Criminology.[100] The facility falls under the UAE's national genomic strategies, which utilizes a "brain fingerprint" system that allegedly generates insight into the suspect's memory upon exposing them to crime scene materials.[101] However, this technology remains controversial and poorly validated due to its intimidating experience to the user, as even basic biometric identifiers raise secrecy apprehensions.

Overpolicing of Minority Communities

The primary ethical issue associated with predictive policing technologies is algorithmic bias, given how predictive systems are trained on historical police data and replicate past patterns of discriminatory policing.[102] According to the US Department of Justice, a Black person is five times as likely to be interrogated without a cause than a white person.[103] A case at Edison Senior High witnessed Haitian and African-American children handcuffed and pushed by police.[104] Around 25 students were arrested, and many more were charged with crimes—particularly "resisting arrest with violence."[105] Beyond exemplifying disproportionate police responses to Black communities, the students being arrested were also being set up for a lifetime of biased assessment because of that arrest record.[106] Additionally, the location-based data generated by their arrests would have also been fed into algorithms that target all young Black people in the surrounding locations of suspicion.[107]

Case Study: Japan

Historically, Japan has often dispatched experts and trained them for over two decades to aid the spread of community-based policing.[108] In December, 2023, Crime Nabi—a crime prediction system that utilizes AI—was created by Singular Perturbations Inc.[109] In cities like Tokyo and Osaka, high population densities bring unique security challenges, requiring agile practices to overstretched police forces. At its core, Crime Nabi relies on integration of data sources.[110] Using factors unrelated to an individual's personal data—past crime occurrence geographics and weather—the system accurately predicts both when and where crimes are likely to occur, formulating optimal routes for patrol.[111] For instance, it detects increased petty thefts near shopping areas on rainy evenings, as well as a rise in cybercrimes during holiday seasons. In 2023, Japan recorded 703,351 criminal

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[100] Ibid.

[101] Dawood, Ayub. "Hand-held fingerprint scanners speed up investigations for Dubai police." Mashable Middle East, 20 October 2021, https://me.mashable.com/tech/15472/hand-held-fingerprint-scanners-speed-up-investigations-for-dubai-police.

[102] "Stuck in a Pattern." Upturn, August 2016, https://www.upturn.org/static/reports/2016/stuck-in-a-pattern/files/Upturn_-_Stuck_In_a_Pattern_v.1.01.pdf.

[103] Douglas, Will. "Predictive policing algorithms are racist. They need to be dismantled." MIT Technology Review, 17 July 2020, https://www.technologyreview.com/2020/07/17/1005396/predictive-policing-algorithms-racist-dismantled-machine-learning-bias-criminal-justice/.

[104] Ibid.

[105] Ibid.

[106] Ibid.

[107] Ibid.

[108] JapanGov. "A Novel Solution to Public Security: Japan's AI-Based Crime Prediction." The Government of Japan, 7 June 2024, https://www.japan.go.jp/kizuna/2024/06/japans_ai-based_crime_prediction.html.

[109] Ibid.

[110] Yamaguchi, Ren. "Crime Nabi: Japan's AI System Pioneering the Future of Predictive Policing." ITBusinessToday, 23 May 2025, https://itbusinesstoday.com/gov-tech/crime-nabi-japans-ai-system-pioneering-the-future-of-predictive-policing/.

[111] Ibid.

offenses, which is a 17% increase from the previous year.[112] The rise of crime during the seasonal era is pre-emptively flagged, allowing for early community outreach before neighborhoods are impacted by the crimes.[113]

Beyond stopping crime, Crime Nabi has indirectly boosted the economy.[114] For example, nighttime thefts in Sapporo have previously deterred investment in entertainment industries; however, the predictive program allowed police to surveil dark alleys, working with businesses to add smart lights and increase visitor traffic.[115] Seeing these long-term benefits, law enforcement agencies ranging from Singapore to Stockholm are attracted to this framework, positioning Japan as a benchmark for AI-driven solutions.[116]

Case Study: South Africa

South Africa experiences one of the highest levels of crime rates in the world, with 161,672 contact crime cases from January 2025-March 2025.[117] Because of this, public confidence in the South African Police Service (SAPS) is considerably low, as the media and recent research reflect the limited budgeting and training when discussing policing tactics.[118] There are several policy documents that discuss the importance of technology in policing. Chapter 12 of the National Development Plan (NDP) prioritizes the need to strengthen the criminal justice system by filling inefficiencies with technology as well as professionalizing police into one that is intelligence-led.[119] In support of the NDP, two national White Papers, one on policing and another on safety and security, were adopted by Cabinet.[120] The White Paper on Policing reflects on "tech-driven solutions to enhance the functioning of police services", while the one on safety and security calls for integrated data systems that collect information real time on types, prevalence, and location of criminal patterns.[121] While South Africa is under-resourced to operate extensive predictive policing programs, they utilized Bayesian analysis, which uses probability statements to answer probability of guilt, as a crime predictor.[122] Although the model holds promise, predictive models operate best when there is ample relevant data to work with, which is proven difficult for South Africa's police force due to confidentiality issues.[123]

[112] Ibid.
[113] Ibid.
[114] Ibid.
[115] Ibid.
[116] Ibid.
[117] Crime Register Head Office. "Police Recorded Crime Statistics." SAPS, 23 May 2025,
https://www.saps.gov.za/services/downloads/2024/2024-2025_Q4_crime_stats.pdf.
[118] Ibid.
[119] Singh, Divya. "Policing by Design: Artificial Intelligence, Predictive Policing and Human Rights in South Africa." Sabinet, 1 June 2022, https://journals.co.za/doi/full/10.10520/ejc-ajcj_v7_n1_a7.
[120] Ibid.
[121] Ibid.
[122] Ajayi, Olasupo. "Artificial intelligence is used for predictive…" UWC, 25 October 2022, https://www.uwc.ac.za/news-and-announcements/news/artificial-intelligence-is-used-for-predictive-policing-in-the-us-and-uk-south-africa-should-embrace-it-too.
[123] Ibid.

Possible Solutions and Controversies

Increased technological oversight and review

A report from the Citizen Lab at the University of Toronto anticipates that officials engage in extensive consultations with independent experts and marginalized communities.[124] In addition, a judge is mandated to sign off on the use of such systems, promoting maximum transparent disclosure with higher-up authorities in the early adoption stages, including model training data.[125] Law enforcement agencies are required to conduct regular audits of these decision-making procedures and technology subject to third-party testing.[126] Agencies could track performance using the Key Performance Indicators (KPIs), reporting on crime reduction rates, improvements in response time, and metrics to engage the public community.[127] This could be modelled off of the US's National Institute of Justice's (NIJ) predictive policing demonstrations, in which they develop and test predictive policing in a real-time context.[128] The NIJ has also funded a team from the RAND Corporation to evaluate the projects, addressing questions regarding the programs' effectiveness.[129] As a result of these RAND assessments, corporations are able to better identify system errors and recommend improvements for predictive policing program developments. For countries centered around liberal democracies, this solution is more feasible due to a strong independent judiciary capable of reviewing algorithmic tools.[130] In these nations, current national data protection authorities already exist, such as Canada's Office of the Privacy Commissioner to support institutional oversight.[131]

The Chicago SSL example shows how continuous evaluation can result in positive improvements on policing. Particularly, the SSL is notorious for having nearly 400,000 people assigned scores on the list, using data including age, number of gun-related encounters, gang affiliation, weapons, or frequent arrests.[132] Notably, RAND's analysis of Chicago's SSL "does not appear to have been successful in reducing gun violence."[133] After this finding, the Chicago Police revised four subsequent versions of the SSL before ending the program in 2019, resorting to place-based predictive algorithms as opposed to individual targeting.[134] RAND's post-mortem of the SSL stressed the benefits of continuous evaluation for most functional outcomes.[135] While this solution was effective for a high-capacity nation like the US, for developing countries or those experiencing ongoing conflicts, oversight

[124] Tang and Hiebert. "The Promises and Perils of Predictive Policing."

[125] Ibid.

[126] Ibid.

[127] Martins, Julia. "What Are KPIs? Defining Key Performance Indicators [2025] • Asana." Asana, 1 March 2025, https://asana.com/resources/key-performance-indicator-kpi.

[128] Pearsall, Beth. "Predictive Policing: The Future of Law Enforcement?" OJP, May 2010, https://www.ojp.gov/pdffiles1/nij/230414.pdf.

[129] Ibid.

[130] Mukand, Sharun, and Dani Rodrik. "THE POLITICAL ECONOMY OF LIBERAL DEMOCRACY." Harvard University, 2016, https://drodrik.scholar.harvard.edu/files/dani-rodrik/files/the_political_economy_of_liberal_democracy_jan_2016.pdf?m=1452283595#:~:text=We%20suggest%20that%20the%20differential,8%20%2D6%2D%20political%20rights.

[131] Dufresne, Philippe. "Prioritizing privacy in a data-driven world." Prioritizing privacy in a data-driven world - Office of the Privacy Commissioner of Canada, 5 June 2025, https://www.priv.gc.ca/en/opc-actions-and-decisions/ar_index/202425/ar_202425/.

[132] Marlowe, George. "Chicago police keep nearly 400,000 on a secret watch list." World Socialist Web Site, 24 May 2017, https://www.wsws.org/en/articles/2017/05/24/chic-m24.html.

[133] Haskins, Paul. "Research Will Shape the Future of Proactive Policing." NIJ, 24 October 2019, https://nij.ojp.gov/topics/articles/research-will-shape-future-proactive-policing.

[134] Kunichoff, Yana, and Patrick Sier. "The Contradictions of Chicago Police's Secretive List." Chicago Magazine, 21 August 2017, https://www.chicagomag.com/city-life/august-2017/chicago-police-strategic-subject-list/.

[135] Pearsall, "The Future of Law Enforcement."

mechanisms are less feasible due to underfunded governmental bodies.[136] This means delegates representing countries with limited state capacity would need to depend on frameworks in developed countries to ensure accountability.

Data transparency frameworks

For Los Angeles, awareness about policing programs like PredPol emerged only after years of advocating for more information from the LAPD about the programs' operations.[137] Similarly, the NYPD has stated that it does not use enforcement arrest data for predictive policing programs.[138] However, their reluctance to produce documentation and audit logs of the algorithms' effectiveness reinforces difficulties for independent policymakers to properly evaluate these tools. A potential solution argues that individuals should always retain the ability to verify and correct the accuracy of personal information in police databases.[139] This can look like establishing citizen advisory boards, town hall meetings, or publishing data on data effectiveness from the KPI performance audits.[140]

Another effective example is observed in Brazil. CrimeRadar is a digital platform launched in August 2016 that forecasts the probability of crime through smartphones and desktop browsers. Using real-time analysis of different neighbourhoods in the Rio de Janeiro municipality, it visualizes the safety levels for both residents and tourists, who are able to access the website and view predictions in a mobile heatmap.
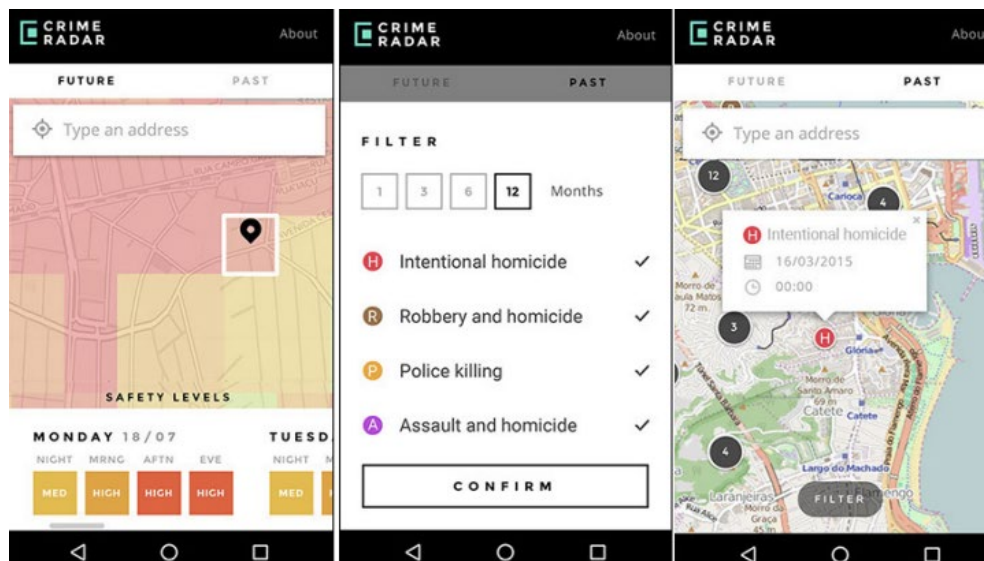
Figure 2: Illustrations of the CrimeRadar mobile application.[141]

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[136] Galiani, "Predictive Policing in a Developing Country."

[137] Lau, "Predictive Policing Explained."

[138] Ibid.

[139] Tang and Hiebert. "The Promises and Perils of Predictive Policing."

[140] Ibid.

[141] Lanz, Jose A. "UK Government Is Secretly Building 'Murder Prediction' AI System." Emerge, 9 April 2025, https://decrypt.co/314187/uk-government-murder-prediction-ai-system.

Compared to typical applications, CrimeRadar was created to engage the public into a cooperative crime prevention strategy, making data more open and accessible.[142] These attempts at transparency increase the city residents' quality of life due to accessible security.[143] Rio de Janeiro in particular saw a slight decrease in crime rates, transitioning from 29.59 to 26.64 per 100,000 residents between 2016 and 2018.[144]

Feasibility is enhanced by the availability of existing institutional frameworks.[145] In the status quo, many national level data projection authorities in countries like Canada, Germany, Kenya, and South Korea have preexisting data protection authorities over high-risk data processing that could be extended to inform the public.[146] Furthermore, regional bodies like the African Union's Convention on Cyber Security and Personal Data Protection or the Inter-American Juridical Committee could issue mandatory public disclosure of the methodologies involved in predictive outputs.[147] This would allow independent third-party evaluations to evaluate the accuracy and potential for bias of these technologies. As a result, predictive policing programs could help prevent unchecked algorithmic profiling, which reduces the risk of disproportionately targeting communities.

However, for countries with weak data security or authoritarian governance, this solution may have little implementation feasibility due to a lack of political incentive to expose systemic flaws in the policing system.[148] Furthermore, implementing citizen advisory boards requires substantial civic engagement in discussing complex digital infrastructures, which may be infeasible for states with a mistrust of authorities and civic education.[149]

Hybrid Policing Models

A hybrid policing solution combines traditional law enforcement methods with predictive policing technologies.[150] Rather than relying on predictive systems to replace human judgement, they are implemented with the purpose to assist decision making. For instance, predictive systems can be used to identify general geographic hot spots through a predictive dashboard, while officers make final decisions on where to allocate themselves.[151] These models would mitigate the risk of overreliance on algorithms, as well as reducing overpolicing and encouraging more reasonably even police distribution.[152] Singapore's PolCam 2.0 initiative is a potential model for this solution.[153] From 2016 to the early 2020s, the program incorporates over 90,000 CCTV

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[142] Muggah, Robert. "What happens when we can predict crimes before they happen?" CGAI, 2 February 2017, https://www.cgai.ca/opedfebruary22017a.

[143] Ibid.

[144] "Brazil Crime Rate & Statistics | Historical Chart & Data." Macrotrends, https://www.macrotrends.net/global-metrics/countries/bra/brazil/crime-rate-statistics.

[145] "A Practical Guide to Data Privacy Laws by Country [2024]." Case IQ, 2024, https://www.caseiq.com/resources/a-practical-guide-to-data-privacy-laws-by-country/#:~:text=At%20the%20national%20level%2C%20the,Privacy%20Act%201983.

[146] Ibid.

[147] Tang and Hiebert. "The Promises and Perils of Predictive Policing."

[148] Global Peace Index. "Data Shows Increased Conflict in an Authoritarian Regime." Vision of Humanity, 22 March 2021, https://www.visionofhumanity.org/chart-of-the-week-conflict-increases-in-authoritarian-regimes/.

[149] Jervis, Tristan, et al. "Next Generation Advisory Boards: A Trending Solution for Bridging the Tech Talent Gap." Russell Reynolds, 20 November 2023, https://www.russellreynolds.com/en/insights/articles/next-generation-advisory-boards-a-trending-solution-for-bridging-the-tech-talent-gap.

[150] Hofstein, Eric. "Holistic Approaches to Criminal Justice Reform." Police Chief Magazine, 14 August 2024, https://www.policechiefmagazine.org/hybrid-officers-holistic-public-safety/.

[151] Ibid.

[152] Ibid.

[153] Low, Chloe. "PolCam: Safeguarding Our Neighbourhoods." MHA, 15 October 2021, https://www.mha.gov.sg/home-team-news/story/detail/polcam-safeguarding-our-neighbourhoods/.

cameras in public commercial areas, which are monitored in real time by the Singapore Police Force (SPF).[154] The video analytics are equipped with anomaly detection systems that flag unusual activity, such as loitering, abandoning objects, or build-ups of crowds.[155] However, trained police investigation teams manually verify these alerts and determine their final responses.[156] Over 5,000 cases of physical crimes—such as unlicensed-moneylending, harassment, theft, property damage—were resolved, decreasing overall crime rates by more than half from 2015-2020.[157] Evidenced by these empirics, this solution has merit for its effectiveness and suitability for a greater variety of countries.

This solution is well-suited for most countries with foundational policing programs, as it requires limited technological advancements and prioritizes the value of traditional police oversight.[158] Particularly, for high-capacity nations with trusted institutions, this solution could safely integrate predictive elements without disrupting the governments' reputable images. Even in contexts where public trust is weak, transparent oversight mechanisms can create reassurance that predictive tools are used solely for enhancing safety. Despite this, for non-urban countries with histories of unforgiving police forces, allowing officers to have executive decisions on their actions may be just as discriminatory as it relies on the officers' personal bias. In addition, there is a current lack of clarity regarding the frameworks necessary for a hybrid policing model. Therefore, this solution is best accomplished by drafting recommendations for establishing a middle ground between traditional and predictive policing.

Funding Education Resources for Criminal Justice Personnel

As opposed to focusing solely on computational accuracy, education resources aim to train developers in public sector applications like law enforcement. Effective programs would include modules on data governance and auditing standards for developers, aiming to produce more technically competent developers who can anticipate the downstream consequences of their systems.[159] One existing initiative is the AI Now Institute at New York University—a leading research centre investigating the social implications of AI.[160] Its public reports focus on the social implications of AI and policy analysis to ensure AI is deployed responsibly and ethically, spreading awareness about audit-centered algorithmic accountability.[161] Illustrating education's effectiveness, the e-Warrants platform in Kentucky generates automated arrest warrants based on algorithmic data.[162] Prior to its implementation, Kentucky had roughly 300,000 unserved warrants statewide.[163] Eventually, the system implemented an information bank that is accessible by all criminal justice personnel, alleviating difficulties with

[154] Ibid.

[155] Ibid.

[156] Hofstein, "Holistic Approaches to Criminal Justice Reform."

[157] Low, "PolCam: Safeguarding Our Neighbourhoods."

[158] Widagso, Kisnu, and Orisa S. Hariyani. "HYBRID POLICING AS AN ALTERNATIVE MODEL OF POLICING AGAINTS CYBERCRIME IN THE INFORMATION SOCIETY." UI Scholars Hub, 12 August 2021, https://scholarhub.ui.ac.id/ijil/vol13/iss4/6/.

[159] "Predictive policing: Navigating the challenges." Thomson Reuters Legal Solutions, 26 March 2025, https://legal.thomsonreuters.com/blog/predictive-policing-navigating-the-challenges/.

[160] "New Artificial Intelligence Research Institute Launches." NYU, 20 November 2017, https://engineering.nyu.edu/news/new-artificial-intelligence-research-institute-launches.

[161] Ibid.

[162] Barton, Ryland. "Kentucky Developing Electronic Search Warrant System." WKU, 23 July 2021, https://www.wkyufm.org/politics/2021-07-23/kentucky-developing-electronic-search-warrant-system.

[163] Kentucky Office of Homeland Security. "Communications and Information Sharing." Homeland Security, https://homelandsecurity.ky.gov/Fusion-Center/Pages/Communications-and-Information-Sharing.aspx#:~:text=On%20any%20given%20day%2C%20there%20are%20an,accessing%20the%20information%20needed%20to%20serve%20warrants.

retrieving warrant information for all counties.[164] This included an independent advisory board composed of legal experts that trained personnel on how to oversee system updates and enhance its functionality. Consequently, the system has seen over 250,000 warrants served or recalled since its rollout in 2008, with 27,894 arrests.[165] This was also implemented with government funding to the Kentucky Attorney General's Office, which received a 3.94 million USD Recovery Act grant to expand its e-Warrants system.[166] This solution is valuable in that education is a scalable and flexible model for promoting responsible predictive policing usage. As AI becomes more applicable to policing programs globally, digital literacy can support citizens' understanding of their personal data protection. This would reduce the likelihood of inaccuracies in predictive policing models, as individuals are better equipped to self-correct the data that policing programs use for predictions; however, education is a long-term investment that requires sustained funding to keep training modules continually updated. For developing nations facing immediate crime challenges, the lack of academic infrastructure present may hinder the feasibility of this solution.

Bloc Positions

Liberal Democracies

Liberal democratic countries—such as Canada, US, Germany, and South Korea—generally emphasize the importance of transparency for enhancing civil liberties, such as publishing information about the inner workings of predictive algorithms, frequent third-party audits, and handing individuals the ability to correct their data.[167] Many democratic countries are also high-profile, developed countries with capacity for expanding digital infrastructure, meaning there have been multiple programs attempted in various neighbourhoods.[168] While recognizing the efficiency of police forces, these nations are typically cautious about current predictive systems due to algorithmic bias, resulting in pauses or scaled-back technological reliance.[169] For instance, countries like Germany or Netherlands have recently banned predictive risk assessments for individuals unless relevant to imminent threats, reinforcing the data protections offered by the GDPR and AI Act.[170] For instance, Germany struck down the HessenDATA system in 2023 for violating the right to informational self-determination because of its lack of transparency regarding the usage of personal data.[171] Law enforcement institutions in this bloc also endure public scrutiny from civic activists, such as lawsuits challenging the fairness of algorithmic tools or advocating for a moratorium on facial recognition technology.[172] Preferred solutions in this bloc would likely include investment in long-term, accessible education, independent audits from decision-making bodies, data sharing with the public, or general hybrid policing models.

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[164] Ibid.

[165] Beshear, Steven. "2009 Annual Report." Kentucky Office of Homeland Security, 2009, https://homelandsecurity.ky.gov/About/Annual%20Reports/2009AnnualReportSectiionOne.pdf.

[166] "Kentucky eWarrants System Moves Into Rural Areas." GovTech, 26 July 2010, https://www.govtech.com/public-safety/kentucky-ewarrants-system-moves-into-rural.html?00000178-6772-d5a5-a5ff-fffea5eb0001-page=2.

[167] Tang and Hiebert. "The Promises and Perils of Predictive Policing."

[168] Ibid.

[169] Ibid.

[170] Team AI Regulation. "German Federal Constitutional Court's Decision on Automated Predictive Policing Algorithms." AI Regulation, 22 February 2023, https://ai-regulation.com/german-federal-constitutional-courts-decision-on-automated-predictive-policing-algorithms/.

[171] Yaşar, Burcu. "A quest for the legality of predictive data analytics in law enforcement: Landmark judgment on automated data analysis by the Federal Constitutional Court of Germany." Lima Blog, 2023, https://limablog.org/a-quest-for-the-legality-of-predictive-data-analytics-in-law-enforcement-landmark-judgment-on-automated-data-analysis-by-the-federal-constitutional-court-of-germany/.

[172] Tang and Hiebert. "The Promises and Perils of Predictive Policing."

Authoritarian and Semi-Authoritarian Countries

This bloc sees predictive policing as a tool to centralize political control, focusing on heavy surveillance with minimum community intervention.[173] National surveillance infrastructures typically collect a vast range of individuals' behavioural and biometric data to flag suspicion.[174] China's IJOP actively exemplifies this, as it relies heavily on facial recognition technology.[175] The Human Rights Watch noted that certain peaceful religious activities—donating to mosques or preaching the Quran—were flagged as criteria for suspicion.[176] Similarly, semi-authoritarian countries like Egypt and Turkey have seen predictive policing linked to counterterrorism operations that target political opposition for sharing political content online.[177] These tools analyze behavioral patterns online to flag individuals deviating from the political ideologies of the state, leading to arrests and interrogations of activists.[178] In terms of solutions, this bloc generally opposes international regulation of predictive policing, but rather sees it as sovereign matters. Rather, they would likely advocate for stricter state discretion and technologically advancing predictive systems to protect their own national interests.[179]

Low-Income or Post-Conflict Countries

Countries such as Nigeria, Afghanistan, DRC, and South Sudan face high barriers to implementing predictive policing.[180] This is not only due to inadequate funding for data infrastructure and training, but also insatiable institutions that have insufficient accountability for their actions.[181] Law enforcement agencies struggle to maintain public trust due to unreliable rules of law.[182] For instance, Afghanistan's policing systems after the 2021 Taliban takeover saw highly centralized yet limited ICT infrastructure.[183] According to the Ministry of Communications and Information Technology (MCIT), basic mobile network coverage is still limited for roughly 30% of the population.[184] Similarly, Nigeria, while more technologically developed with a sizable population, contains one of the highest violent crime rates in sub-Saharan Africa.[185] In 2024 alone, there were 51,997,032 recorded crimes across various households, primarily affecting the Northwest region.[186]

[173] McCarthy, Daniel, et al. "Understanding public confidence in the police within democratic and authoritarian regimes." Wiley, 7 September 2024, https://onlinelibrary.wiley.com/doi/full/10.1002/pad.2072.

[174] Tang and Hiebert. "The Promises and Perils of Predictive Policing."

[175] Human Rights Watch. "China's Algorithms of Repression | Reverse Engineering a Xinjiang Police Mass Surveillance App." HRW, 1 May 2019, https://www.hrw.org/report/2019/05/01/chinas-algorithms-repression/reverse-engineering-xinjiang-police-mass.

[176] Ibid.

[177] Kaskina, Rasma, and Angelina Cvetkovska. "Artificial intelligence (AI) and human rights: Using AI as a weapon of repression and its impact on human rights." EuroParl, June 2024, https://www.europarl.europa.eu/RegData/etudes/IDAN/2024/754450/EXPO_IDA(2024)754450(SUM01)_EN.pdf.

[178] Ibid.

[179] McCarthy, "Understanding public confidence in the police within democratic and authoritarian regimes."

[180] Galiani, Sebastian. "Predictive Policing in a Developing Country: Evidence from Two Randomized Controlled Trials." SSRN, 20 April 2022, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4080483. Accessed 27 June 2025.

[181] Ibid.

[182] Ibid.

[183] "Afghanistan's Security Challenges under the Taliban | International Crisis Group." Crisis Group, 12 August 2022, https://www.crisisgroup.org/asia/south-asia/afghanistan/afghanistans-security-challenges-under-taliban.

[184] Hashimi, Momtaz A. "Barriers to digital transformation in SMEs: A case study of Afghanistan." All Commerce Journal, 22 March 2025, https://www.allcommercejournal.com/article/536/6-1-103-890.pdf.

[185] Adebowale, Akinjide. "REPORT: Nigeria Records 51,887,032 Household Crimes in 2024." FIJ, 17 December 2024, https://fij.ng/article/report-nigeria-records-51887032-household-crimes-in-2024/.
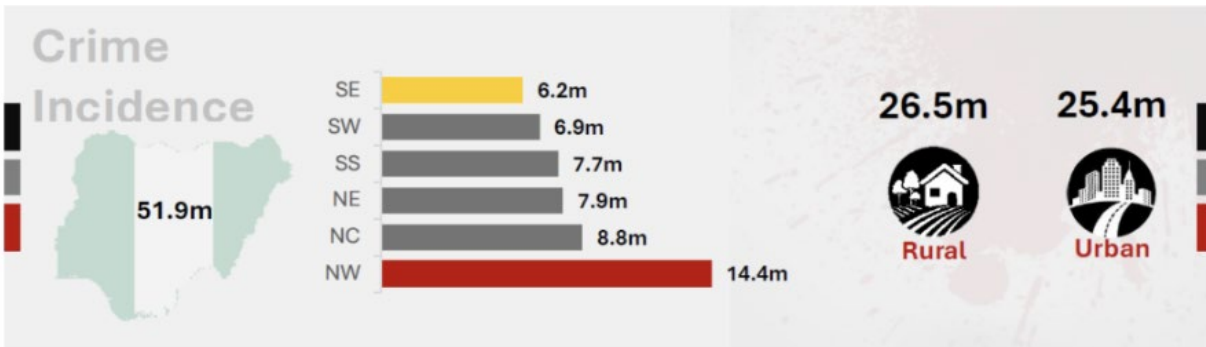
[186] Ibid.

Figure 3: Distribution of crime incidence in Nigeria.[187]

However, the policing infrastructures are unable to match these staggering criminal incidents, which can be attributed to the lack of electricity and internet reliability.[188] Because of this, developing nations are likely to join partnerships with developed nations for funding, accompanied by a focus on capacity building. This could look like simpler crime dashboards while channeling greater effort into traditional policing methods.

Discussion Questions

1. What measures can be taken to minimize inaccuracies, such as false positives, race-based bias, or incomplete data, in predictive policing practices?

2. To what extent should public input be involved in the development and implementation of predictive policing?

3. How should predictive policing programs be implemented and funded in developing zones of post-conflict or crime vulnerability?

4. What types of data should predictive policing programs analyse to reduce as much disproportionate policing as possible? What data should be off-limits?

5. Should countries be required to disclose internal operations of predictive algorithms, even if companies claim it is proprietary?

6. Which authoritative bodies (e.g. police, lawyers, judges, local governments) should be responsible for evaluating the effectiveness of predictive policing initiatives?

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[187] Ibid.
[188] Galiani, "Predictive Policing in a Developing Country."

Additional Resources

Predictive Policing Algorithms and Racial Identities | https://www.technologyreview.com/2020/07/17/1005396/predictive-policing-algorithms-racist-dismantled-machine-learning-bias-criminal-justice/.

Future Policing Trends in the US and Europe | https://www.mdpi.com/2076-0760/10/6/234.

Crime Forecasting in Law Enforcement | https://www.rand.org/pubs/research_reports/RR233.html.

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Predictive Policing and Authoritarianism | https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3700785.

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Whistleblower Protection

Overview

Whistleblower protection refers to the protective systems that defend individuals reporting wrongdoing from retaliation.[189] These individuals—often employees within organizations—report instances of fraud, corruption, or workplace rights violations.[190] While whistleblowers are essential to holding accountability in both public and private sectors, they frequently face adverse consequences including job loss, blacklisting, reputational damage, and threats.[191] In many countries, legal frameworks attempt to protect whistleblowers who make protected disclosures, which are referred to as reports made in the betterment of public interest.[192] Without effective protections, harmful practices can often go undetected.

The scope and magnitude of these whistleblower protections vary globally. Some countries have made clear statements to emphasize their dedication to protection systems, while others have limited or partial implementations. For instance, the US has built an expansive legal regime, with federal protection laws such as the Whistleblower Protection Act of 1989, which protects federal employees from the employer's retaliation, such as firing, demoting, or reducing wages.[193] A less robust protection system can be seen in India, with the Whistleblowers Protection Act passed in 2014 being largely ineffective due its narrow scope: by excluding public servants, it discouraged reports that went against authoritative interests.[194] This variability can be attributed to a nation's financial potential to establish advanced and safe reporting systems as well as their cultural attitudes towards transparency.

On a broader scale, international bodies have cooperated to encourage more consistent protection laws. Article 33 of the United Nations Convention Against Corruption (UNCAC) provisions recommend that member states' domestic legal systems incorporate protection for individuals who report corruption-related offenses on reasonable grounds.[195] Similarly, the European Union (EU) Whistleblower Protection Directive in 2019 mandates that all EU member states legislated their agreed-upon minimum amount of protection for whistleblowers.[196] In practice, many national frameworks rely on the willingness of privatized corporations to implement and maintain. This reliance can create uneven protections: large corporations might be more likely to afford secure reporting systems, while reporting channels may be weaker in smaller, less regulated companies. Given these

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inconsistencies in current legislation, delegates must acknowledge national interests and collaborate to create strongly enforceable protection frameworks.

Timeline

July 30, 1778 — The US Continental Congress passes a resolution protecting naval whistleblowers, making it the world's first whistleblower protection law.[197]

March 2, 1863 — The US imposes the False Claims Act (FCA) that allows private citizens to bring lawsuits against companies or individuals suspected of fraud on behalf of the government. Citizens can share the recovered funds, incentivising them to report further fraud.[198]

December 10, 1942 — Polish courier Jan Karski reports on the atrocities in the Warsaw Ghetto, and delivers his firsthand accounts to political leaders, exposing war crimes at a personal risk.[199] This case serves as a moral precedent for whistleblowing on cases relating to human rights violations.

July 30, 1988 — The National Whistleblower Centre was established as a nonprofit advocacy organization. It operates three tailored programs to provide whistleblowers legal assistance globally.[200]

July 2, 1998 — The UK enacts the Public Interest Disclosure Act (PIDA), the first comprehensive law protecting both public and private sector whistleblowers.[201]

August 7, 2000 — South Africa includes whistleblower rights in the Protected Disclosures Act (PDA), making it one of the first African countries to legislate protections for individuals reporting corruption or abuse.[202]

December 2, 2001 — Enron Corporation's Vice President Sherron Watkins expresses concerns about financial misconduct, which triggers federal investigations exposing corporate fraud.[203] This scandal led to the passage of the Sarbanes Oxley Act of 2002, which introduces major US whistleblower protections for private sector employees.[204]

[197] NAVEX Editorial Team. "A History of Whistleblowing in America." NAVEX, 29 July 2022, https://www.navex.com/en-us/blog/article/a-history-of-whistleblowing-in-america/.

[198] Civil Division. "Civil Division | The False Claims Act." Department of Justice, 15 January 2025, https://www.justice.gov/civil/false-claims-act.

[199] "Jan Karski | Holocaust Encyclopedia." Holocaust Encyclopedia, 22 July 2021, https://encyclopedia.ushmm.org/content/en/article/jan-karski.

[200] National Whistleblower Centre. "Mission & History." NWC, https://www.whistleblowers.org/mission-history/.

[201] Brione, Patrick, and Katherine Garratt. "Whistleblowing and gagging clauses - House of Commons Library." Commons Library, 13 November 2023, https://commonslibrary.parliament.uk/research-briefings/cbp-7442/.

[202] Republic of South Africa. "Protected Disclosures Act [No 26 of 2000]." South African Government, 7 August 2000, https://www.gov.za/sites/default/files/gcis_document/201409/a26-000.pdf.

[203] UNC. "Enron whistleblower shares lessons on corporate integrity." Kenan Flagler, 25 November 2015, https://www.kenan-flagler.unc.edu/news/enron-whistleblower-shares-lessons-on-corporate-integrity/.

[204] Eichler, Ryan. "Sarbanes-Oxley Act: What It Does to Protect Investors." Investopedia, 2025, https://www.investopedia.com/terms/s/sarbanesoxleyact.asp.

October 31, 2003 — The United Nations Convention Against Corruption (UNCAC) is formed, making it the first and only legally binding anti-corruption instrument.[205]

February 12, 2008 — The European Court of Human Rights (ECHR) rules that firing Iacob Guja for exposing police misconduct violates his freedom of expression under Article 10 of the European Convention on Human Rights.[206] This case reinforces whistleblower protection rights in Europe.[207]

November 26, 2009 — The Organisation for Economic Co-operation and Development (OECD) Council adopts a recommendation urging countries to establish whistleblower protections in both the public and private sectors.[208] This strengthens the effectiveness of the Anti-Bribery Convention in its aims to criminalize corruption.[209]

August 5, 2011 — South Korea expands whistleblower projections in the Protection of Public Interest Whistleblowers Act (PPIWA), defining public interest infringements for whistleblowers while prohibiting the disclosure of whistleblower identities.[210]

April 3, 2016 — The Panama Papers leak releases 11.5 million documents from a Panamanian law firm, sparking global investigations into financial wrongdoings of high-profile individuals.[211]

December 16, 2019 — The EU's Whistleblower Protection Directive enters into force for all member states, setting minimum standards for whistleblower protections.[212]

August 21, 2023 — Chile adopts Law No. 21,592. This institutionalizes whistleblower protections across both public and partially private sectors, mandating secure reporting channels managed by the Comptroller General, the head of public administration within Chile, while also extending protections for relatives of whistleblowers.[213]

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[205] Government Accountability Project. "Statement submitted by Government Accountability Project, a non-governmental organizations not in consultative status with the E." United Nations Office on Drugs and Crime, 15 December 2023, https://www.unodc.org/documents/treaties/UNCAC/COSP/session10/NGO/CAC-COSP-2023-NGO58.pdf.

[206] Columbia University. "Guja v. Moldova." Global Freedom of Expression, https://globalfreedomofexpression.columbia.edu/cases/guja-v-moldova/.

[207] Ibid.

[208] OECD Publishing. "Committing to Effective Whistleblower Protection (EN)." OECD, 2016, https://www.oecd.org/content/dam/oecd/en/publications/reports/2016/03/committing-to-effective-whistleblower-protection_g1g65d0a/9789264252639-en.pdf.

[209] Ibid.

[210] "South Korea's Whistleblower System." National Whistleblower Center, https://www.whistleblowers.org/south-koreas-whistleblower-protection-and-reward-system/.

[211] "What is Panama Papers Scandal? | Prasad Knowledge Base." Prasad & Company LLP, 2025, https://www.prasadcpa.com/blog/the-panama-papers-explained/.

[212] European Union. "Protection for whistleblowers - European Commission." European Commission, https://commission.europa.eu/aid-development-cooperation-fundamental-rights/your-fundamental-rights-eu/protection-whistleblowers_en.

[213] OECD. "DIRECTORATE FOR FINANCIAL AND ENTERPRISE AFFAIRS WORKING GROUP ON BRIBERY IN INTERNATIONAL BUSINESS TRANSACTIONS." Organisation for Economic Co-operation and Development, 2024, https://one.oecd.org/document/DAF/WGB(2024)27/FINAL/en/pdf.

July 3, 2024 — The European Commission adopts a report that assesses the transposition of the Whistleblower Protection Directive, attempting to enforce its implementation.[214]

Historical Analysis

Whistleblower protection can be traced back to the American Revolution of the late 18th century.[215] In 1777, ten American sailors and marines reported their commander, Commodore Esek Hopkins, for abusing British prisoners of war; these whistleblowers were subsequently fired and imprisoned for said report.[216] In response to this unjust consequence, the US Continental Congress passed its first whistleblower protection law on July 30, 1778.[217] It was since established that all individuals in the service of the US had the responsibility to offer the earliest information to Congress or any other proper authority of any misconduct, frauds, or misdemeanors.[218] Decades later, the US's FCA allowed individuals—who were often referred to as relators—to bring lawsuits on behalf of the government against entities engaged in fraud. It stated that successful relators were eligible to receive a portion of any recovered funds, which encouraged the exposure of corruption as well as an early link for future financial incentives.[219]

While these early protections laid substantial foundations for future laws, it was not until the 20th century that the whistleblower protections obtained widespread awareness, which was in part due to the limitations of previous methods. In 1978, an Office of Special Counsel was established as a means to protect whistleblowers; it proved dormant and ineffective by the 1980s.[220] Consequently, the US's Whistleblower Protection Act of 1989 was formed to protect executive branch employees when reporting agency wrongdoing.[221] The legislation also enables the media to share such information, stating that the right to share sensitive information regarding wrongdoings supersedes restrictions imposed by non-disclosure agreements, a line of logic which has propagated internationally.[222] In 1998, the UK passed its Public Information Disclosure Agreement (PIDA) as the world's first general legal framework that protected whistleblowers' actions. Specifically, it prohibited retaliation against employees who report wrongdoing regarding crime, workplace safety, environmental harm, or fraud in workplace settings.[223] The end of apartheid and the establishment of democratic governance in the 1990s led to the similar formation of the South African PDA.[224] It forbade occupational detriment as a consequence of having made a disclosure for the betterment of the public.[225] However, this protection's jurisdiction is limited to workplace detriments, which excludes those working as independent contractors, volunteers, or agency workers.[226]

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[214] Ibid.

[215] NAVEX Editorial Team. "A History of Whistleblowing in America."

[216] Ibid.

[217] Ibid.

[218] Ibid.

[219] The False Claims Act." Department of Justice.

[220] Cohen, Matt. "Trump Administration Asks SCOTUS to Uphold Firing of Special Counsel." Democracy Docket, 18 February 2025, https://www.democracydocket.com/news-alerts/trump-administration-asks-scotus-to-uphold-firing-of-special-counsel/.

[221] Louka, Stelio. "Whistleblower Protections and International Law: Protecting the Right to Share Government Misconduct - HKS Student Policy Review HKS Student Policy Review." HKS Student Policy Review, 8 March 2025, https://studentreview.hks.harvard.edu/whistleblower-protections-and-international-law-protecting-the-right-to-share-government-misconduct/.

[222] Ibid.

[223] UK Public General Acts. "Public Interest Disclosure Act 1998." Legislation.gov.uk, 1998, https://www.legislation.gov.uk/ukpga/1998/23/contents.

[224] Republic of South Africa. "Protected Disclosures Act [No 26 of 2000]."

[225] Ibid.

[226] "South Africa." PPLAAF, May 2025, https://www.pplaaf.org/country/southafrica.html.

High-profile corporate scandals have further accelerated reform. A rise in awareness about whistleblowing has seen an ensuing increase in the number of substantial reports. At its peak, Enron was the 7th largest company in the US, having achieved this feat by reporting a high revenue and share worth.[227] However, in December 2001, the vice president of Enron, Sherron Watkins, raised internal concerns about the company's accounting fraud designed to deceive investors and inflate the stock price.[228] Specifically, the company's misconduct was heavily supported by the use of Special Purpose Entities: confidential partnerships which kept liabilities off its balance sheet, thereby inflating profits.[229] It was subsequently revealed that Enron had made plans to fire her for reporting these concerns about the company's accounting.[230] By early November, Enron admitted it had inflated its income by around USD 586 million since 1997, before filing for bankruptcy in December.[231] As a result of this occurrence, the 2002 Sarbanes-Oxley Act (SOX) was passed, which mandated that senior corporate officers certify in writing that their company's financial statements comply with the Securities and Exchange Commission (SEC) disclosure requirements, increasing corporate accountability.[232]

Beyond these individual cases, there have been similar governance reforms related to implementing internal reporting channels. At the international level, the OECD has encouraged accountability across borders beginning with its Anti-Bribery Convention, which criminalized the act of bribing foreign public officials to obtain business advantages. To sufficiently carry this convention in practice, the OECD Anti-Bribery Recommendation of 2009 calls for the protection of whistleblowers in both public and private sectors through stronger confidential reporting channels. Within individual countries, a considerable amount of governance is dedicated to whistleblower protections. For instance, the 2004 Japanese Whistleblower Protection Act (WPA) mandates companies with over 300 employees to establish internal reporting channels for whistleblowers.[233] Additionally, the act required a Japan-based official to handle local whistleblower reports to ensure the functionality of reporting channels.[234] Beyond basic protections, many developed countries have begun shifting towards further approaches to encourage whistleblowers. The Dodd-Frank Act of 2010 offers financial incentives for corporate whistleblowers reporting to the SEC, which has paid over USD 1.9 billion to eligible individuals since 2011.[235] Conversely, Canada's protections are narrower; its Public Servants Disclosure Act of 2007 governs solely federal public servants.[236] Moreover, it was heavily criticized for a lack of enforcement: the Act claimed to protect 400,000

[227] Wharnsby, Tim. "The rise and fall of Enron: a brief history." CBC, 25 May 2006, https://www.cbc.ca/news/business/the-rise-and-fall-of-enron-a-brief-history-1.591559.

[228] National Whistleblower Center. "South Korea's Whistleblower System." NWC, https://www.whistleblowers.org/south-koreas-whistleblower-protection-and-reward-system/.

[229] Segal, Troy. "Enron Scandal and Accounting Fraud: What Happened?" Investopedia, 3 December 2024, https://www.investopedia.com/updates/enron-scandal-summary/.

[230] Ibid.

[231] Ibid.

[232] "The Sarbanes-Oxley Act." Sarbanes-Oxley Act | Sarbanes-Oxley Compliance Professionals Association (SOXCPA), https://www.sarbanes-oxley-act.com/.

[233] "New Whistleblowing System Requirements for Japanese Organizations - Whispli." WHISPLI, https://resources.whispli.com/blog/new-requirements-japanese-whistleblowing-system

[234] Yoshida, Takeshi. "Japan: 2025 Amendment to the Japanese Whistleblower Protection Act — Summary and practical responses." Baker McKenzie, 8 July 2025, https://insightplus.bakermckenzie.com/bm/dispute-resolution/japan-2025-amendment-to-the-japanese-whistleblower-protection-act-summary-and-practical-responses/.

[235] Lee, Allison Herren, and Kohn Kohn. "A Proven Success: The SEC Whistleblower Regime Provides a Roadmap for DOJ's New Program." The Harvard Law School Forum on Corporate Governance, 25 April 2024, https://corpgov.law.harvard.edu/2024/04/25/a-proven-success-the-sec-whistleblower-regime-provides-a-roadmap-for-dojs-new-program/.

[236] Government of Canada. "Overview of the Public Servants Disclosure Protection Act." Canada.ca, 7 October 2024, https://www.canada.ca/en/treasury-board-secretariat/services/values-ethics/disclosure-protection/overview-public-servants-disclosure-protection-act.html.

public servants, but it ignored the remainder of Canada's 17 million employees.[237] This suggests the need to continue amending contemporary whistleblower protection laws for enhanced effectiveness.

Past UN/International Involvement

UNCAC Involvement

Figure 1: Countries with national laws protecting whistleblowers as of 2017.[238]

The UNCAC was the first legally-binding global treaty to recognize whistleblowers in corruption-related cases.[239] 191 countries have ratified the UNCAC to various levels of success.[240] Particularly, the UNODC delineated that 70 percent of countries that ratified the UNCAC have not developed protections in regards to Article 33, which encouraged states to consider appropriate protections for those who report corrupt offenses.[241] The UNCAC Implementation Review Group (IRG) and the Conference of State Parties (COSP) are mechanisms intended to achieve further progress for the UNCAC Coalition.[242] Notably, a 2012 report noted an absence of specific regulations and systems in regards to implementing protections for private-sector employees.[243] Involvement in whistleblowing discussions was evident at the 8th Conference of States Parties to UNCAC during December 2023 held in Atlanta, which saw increased attendees from various civil society organizations, including the Human

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[237] "What's Wrong with Canada's Federal Whistleblowing System." CFE, The Centre for Free Expression at Ryerson, 14 June 2017, https://cfe.torontomu.ca/publications/whats-wrong-canadas-federal-whistleblower-legislation.

[238] National Whistleblower Center. "Whistleblower Laws Around the World." NWC, https://www.whistleblowers.org/whistleblower-laws-around-the-world/.

[239] United Nations. "Learn about UNCAC." UNODC, https://www.unodc.org/corruption/en/uncac/learn-about-uncac.html.

[240] Louka, Stelio. "Whistleblower Protections and International Law: Protecting the Right to Share Government Misconduct." Harvard Kennedy School, 8 March 2025, https://studentreview.hks.harvard.edu/whistleblower-protections-and-international-law-protecting-the-right-to-share-government-misconduct.

[241] Ibid.

[242] UNCAC. "Whistleblower Protection and the UN Convention against Corruption - Executive summary -." UNCAC Coalition, https://uncaccoalition.org/resources/whistleblower-protection/whistleblower-protection-executive-summary-english.pdf.

[243] Ibid.

Rights Actions in Niger (HRAN), Construisons Ensemble le Monde in the DRC, and Forum Civil in Senegal.[244] Several of the resulting provisions demanded states to strengthen the inclusivity of confidential complaint systems that are inclusive, periodically assess the effectiveness of their domestic law, encourage material training at the regional level, and request capacity-building from the UNODC.[245] The actions and provisions set by the UNCAC serve as global standards for parties to enact confidential reporting systems. While establishing frameworks are beneficial, they often struggle when creating country-specific actionable resolutions and monitoring implementation.

The EU Whistleblower Directive

The EU's landmark development was the Whistleblower Directive of 2019, creating minimum rules for all 27 member states.[246] First, the Directive mandated reporting channels for companies with over 50 employees while also suggesting that public bodies must establish external confidential reporting channels.[247] This legislation also suggested for whistleblowers to be shielded from dismissal or retaliatory discrimination: the burden of proof would shift to the employer to demonstrate that negative action taken against the whistleblower was unrelated to their reporting obligations.[248] Finally, all EU member states were required to provide whistleblowers with access to appropriate legal, financial, and psychological assistance.[249]

Figure 2: Reports on citizens' attitudes towards corruption in the EU during 2023.[250]

States were provided until December 17, 2021 to transpose the Directive into national law; however, it took until 2024 for EU countries to pass legislation; even so, the implementation of such was limited and rushed to meet the

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[244] Rubiano, Camilo. "Historic Resolution on Protecting Whistleblowers Adopted at UN Convention Against Corruption." PSI, 12 February 2024, https://publicservices.international/resources/news/historic-resolution-on-protecting-whistleblowers-adopted-at-un-convention-against-corruption?id=14687&lang=en.

[245] United Nations. "Conference of the States Parties to the United Nations Convention against Corruption." UNCAC, 15 December 2023, https://pop-umbrella.s3.amazonaws.com/uploads/74640190-ed22-4c07-8aee-68c99dc769de_2325382E.pdf?key=.

[246] Landbo, Yulia. "Whistleblowing Directive 2023: A Comprehensive Summary of What You Need to Know." Whistleblower Software, 24 November 2023, https://whistleblowersoftware.com/en/eu-whistleblowing-directive-summary.

[247] Ibid.
[248] Ibid.
[249] Ibid.
[250] Ibid.

organization's deadline.[251] As seen in Figure 2, public awareness in the EU regarding corruption remains low, with over half of the European population being unaware of existing reporting channels.[252] 10 member states, including France, Denmark, and Sweden, have made significant strides to establish safe, confidential reporting channels to collectively prevent retaliatory intentions.[253] While these 10 nations have transposed the Directive into its national law, the other 16 EU member states have been slower at adopting whistleblower protection laws, with bills at various stages in the legislative process.[254]

Latvia serves as an example for countries with low whistleblowing awareness. Despite having extensive anti-corruption legislation, the 2014 Eurobarometer data showed that 92 percent of respondents in Latvia did not report corruption.[255] Latvia implemented the EU Directive in 2022, notably after the EU's intended deadline of December 2021.[256] Across other EU countries, there is a persistent lack of awareness and limited incentive to use these whistleblower mechanisms.[257] Despite delayed implementation gaps, organizations based in Europe saw median reports per 1000 employees increase from 5.3 in 2022 to 6.3 in 2023, suggesting that the success of this directive varies widely by individual member state.[258]

OECD Involvement

Collaborating with over 100 countries, the Organization for Economic Cooperation and Development is a global policy forum promoting economic and social well-being.[259] In 1998, the OECD released their *Recommendation on Improving Ethical Conduct in Public Service*. It spearheaded early provisions on combating corruption in the public sector by outlining the importance of protecting individuals who report wrongdoings.[260] However, it was not until the Recommendation for Further Combating Bribery of Foreign Public Officials of 2009 that the OECD solidified its efforts to establish appropriate channels for investigating allegations of corrupt actions.[261] Notably, in its 2010 Seoul Summit, the OECD cooperated with the Group of Twenty Leaders (G20) in drafting an Anti-Corruption Action Plan, which emphasized whistleblower protection throughout.[262] Another 2016 survey found that more OECD countries have employed dedicated whistleblower protection laws in the past 5 years than the

[251] European Commission. "EUROPEAN COMMISSION Brussels, 3.7.2024 COM(2024) 269 final REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCI." EUR-Lex, 2024, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52024DC0269.

[252] Mosqueda, Sara. "Report Finds 2023 Brought More Whistleblowing Reports Than Ever." ASIS International, 6 June 2024, https://www.asisonline.org/security-management-magazine/latest-news/today-in-security/2024/june/navex-2024-whistleblower-report/.

[253] Djukić, Lívia. "Whistleblower Protection in the EU: Which countries have already enacted whistleblowing, and which are lagging behind?" Havel & Partners, 17 October 2022, https://www.havelpartners.com/whistleblower-protection-in-the-eu-which-countries-have-already-enacted-whistleblowing-and-which-are-lagging-behind/.

[254] Ibid.

[255] European Union. "Citizens' attitudes towards corruption in the EU in 2023." EuroParl, 2023, https://europa.eu/eurobarometer/surveys/detail/2968.

[256] Ibid.

[257] Ibid.

[258] Ibid.

[259] The Organisation for Economic Co-operation and Development. "About." OECD, https://www.oecd.org/en/about.html.

[260] "Compliance & Investigations OECD recommendations." Gleiss Lutz, 29 March 2022, https://www.gleisslutz.com/en/news-events/know-how/oecd-recommendations.

[261] Ibid.

[262] The Group of Twenty. "G20 Anti-Corruption Action Plan." G20, 2010, https://star.worldbank.org/sites/star/files/g20_acwg_seoul_2010_action_points_for_whistleblower_protection_0.pdf.

previous 25 years, with 84 percent of respondents reporting the enactment of a dedicated legal provision specifically protecting public-sector whistleblowers from retaliation.[263]

Regardless of the OECD's continuing efforts, it is important to note that many countries, particularly those outside of OECD membership, do not have standardized guidelines for establishing whistleblower protections. For example, the 2021 OECD Integrity Review of Thailand highlighted that even when whistleblower protections are being gestured in existing legislation for anti-corruption acts, Thailand has no dedicated whistleblower protection law.[264] This is a similar situation in Argentina, which also has no standalone whistleblower protection law but is rather indirectly suggested through anti-corruption statutes. Argentina was ranked 99 out of 180 on the 2024 Corruption Perceptions Index, which suggests a prevalence of corruption concerns.[265] Nonetheless, citizens have a limited channel to report such wrongdoings safely, and rather rely on the media without clear confidentiality. These cases underscore how whistleblower laws for states outside the OECD can have limited responses to the OECD's proposals, requiring alternative oversight to address practical gaps in whistleblower protections globally.

Current Situation

Current Punitive Measures

Despite increasing international recognition of the importance of whistleblowers in uncovering fraudulent activity, many individuals who speak out are still subject to severe reprisals. Previous severe cases can be seen in the US, where whistleblowers who disclose classified information face some of the harshest legal consequences.[266] In 2013, former contractor for the National Security Agency (NSA) Edward Snowden exposed the US government's mass surveillance programs. He revealed that the NSA was collecting phone and internet data by profiling millions of citizens without a warrant. As controversies regarding data privacy were on the rise, Snowden was immediately indicted under the Espionage Act of 1917: a century-old law that forbids whistleblowers to defend personal actions on the basis of public interest.[267] Facing imprisonment, Snowden later fled to Russia, gaining asylum and being granted citizenship.[268] While his punishment was evidently punitive, his case brought to light the unjust penalties handed to whistleblowers in the following decade.

However, beyond illegal corporate crime, punitive measures are also used in response to criticism within authoritarian regimes. Chinese Dr. Ai Fen—the head of the emergency department at Wuhan Central hospital—went missing after she claimed that their censorship delayed the adoption of measures against COVID-19 and therefore contributed to its spread in China. Allegedly, her criticisms towards China's censorship led to potential

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[263] Ibid.

[264] Organization for Economic Co-operation and Development. "OECD Review of Thailand's Legal and Policy Framework for Fighting Foreign Bribery (EN)." OECD, https://www.oecd.org/content/dam/oecd/en/publications/reports/2024/11/oecd-review-of-thailand-s-legal-and-policy-framework-for-fighting-foreign-bribery_de4f5179/09fbb31d-en.pdf.

[265] Transparency International. "Our Work In Argentina." Transparency International, 2024, https://www.transparency.org/en/countries/argentin.

[266] Younger, Nick. "The case of Edward Snowden." National Whistleblower Center, 19 November 2020, https://www.whistleblowers.org/news/the-case-of-edward-snowden/.

[267] Ibid.

[268] Myre, Greg. "A decade on, Edward Snowden remains in Russia, though U.S. laws have changed." NPR, 4 June 2023, https://www.npr.org/2023/06/04/1176747650/a-decade-on-edward-snowden-remains-in-russia-though-u-s-laws-have-changed.

detainment and erasure from media outlets at large.[269] Similarly, Jean Lennane, the former president of Whistleblowers Australia, reported that Australian whistleblowers are routinely harassed through a variety of petty humiliations, whether it be referral for psychiatric assessment or repeated threats of disciplinary action.[270] Beyond punishments from employers, potential whistleblowers are discouraged due to reputational damage from friends and colleagues alongside victimisation, otherwise known as workplace discrimination, as a result of their actions.[271] As a global EY survey highlighted that 54 percent of reporting channel users claimed to have faced external pressure not to do so.[272] This finding suggests that even while legal protections can hold corporate leaders accountable for unfair whistleblowing penalties, the loss of social support in the workplace also heavily disincentivizes individuals from utilizing reporting channels.

The Role of the Media

The media is pivotal in amplifying whistleblower disclosures and holding high-ranking officials accountable: coverage ensures that whistleblower reports are properly acknowledged and acted upon.[273] In Kenya, for example, recent investigative journalism has exposed high-profile corruption with the help of whistleblowers.[274] John-Allan Namu is an investigative journalist and the co-founder of Africa Uncensored—an independent media outlet focused on detailed journalism in Africa.[275] He aired a two-part documentary named *Fertile Deception,* which exposed the mining, packaging, and distribution of ordinary sand disguised as subsidized fertilizer that was sold to farmers at inflated prices.[276] This investigation shed light on the failure of government agencies in protecting the consumer, who are victims of corruption in Kenya. Another example in Malaysia is the alleged fraud of 1 Malaysia Development Berhad (1MDB); It was alleged that over USD 4.5 billion was stolen, according to leaked financial documents.[277] Specifically, up to USD 731 million was borrowed through connections to government officials and siphoned into individual bank accounts across Switzerland, Singapore, and the US. In 2015, British journalist Clare Rewcastle-Brown handed 227,000 leaked documents detailing the fraud, where she investigated further through running the website Sarawak Report.[278] Her efforts to uncover the truth came at a personal cost: during 2024, Brown was sentenced in absentia to two years in prison for a supposed minor error in the Sarawak Report, which she had corrected in 2018. International organizations, such as the Reporters Without Borders (RSF) have condemned this court's ruling and viewed it as an attempt to suppress journalism.[279] Clare Rewcastle-

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[269] Reporters Without Borders. "Whistleblowing doctor missing after criticizing Beijing's coronavirus censorship." RSF, 13 April 2020, https://rsf.org/en/whistleblowing-doctor-missing-after-criticizing-beijings-coronavirus-censorship.

[270] Nie, Jing-Bao, and Carl Elliott. "Humiliating Whistle-Blowers: Li Wenliang, the Response to Covid-19, and the Call for a Decent Society." NIH, 25 August 2020, https://pmc.ncbi.nlm.nih.gov/articles/PMC7445730/.

[271] Ibid.

[272] Ridley, Kirstin, and Ros Russell. "Staff warned off whistleblower hotlines, says global survey." Reuters, 5 June 2024, https://www.reuters.com/sustainability/boards-policy-regulation/staff-warned-off-whistleblower-hotlines-says-global-survey-2024-06-05.

[273] Ibid.

[274] International Consortium of Investigative Journalists. "John-Allan Namu." ICIJ, https://www.icij.org/journalists/john-allan-namu/.

[275] Ibid.

[276] Jnr, Bojang. "Kenya fertiliser scam: Journalist vows to name politicians who tried to hush him." The Africa Report.com, 5 April 2024, https://www.theafricareport.com/343039/kenya-fake-fertiliser-scam-journalist-says-he-will-name-politicians-who-tried-to-hush-him-up/.

[277] Ellis, Hannah. "1MDB scandal explained: a tale of Malaysia's missing billions." The Guardian, 25 October 2018, https://www.theguardian.com/world/2018/oct/25/1mdb-scandal-explained-a-tale-of-malaysias-missing-billions.

[278] Ibid.

[279] E-AymenBabar, Um. "Clare Rewcastle Brown: The cost of exposing Malaysia's biggest corruption scandal — Women in Journalism." Women in Journalism, 6 May 2025, https://www.womeninjournalism.co.uk/journalists-under-threat/clare-rewcastle-brown-the-cost-of-exposing-malaysias-biggest-corruption-scandal.

Brown's case reveals how intentional censorship undermines even the most robust of protections for whistleblowers worldwide.

Journalism is only a viable whistleblower method in certain liberal states; in countries with stronger censorship laws, media coverage is often futile due to repression by authoritarian regimes. This is exemplified in Russia, where journalist Ivan Safronov was convicted of treason in 2020 for allegedly sharing classified information with Czech intelligence.[280] In February 2023, Safronov was transferred to a highly secured prison in Siberia to serve his sentence. This is a microcosm of Russia's recent media dissent policy; at least 38 journalists are held in prison as of 2025 in Russia.[281]

The rise of digital platforms has become essential tools for whistleblowers to gain visibility for their reports. The effectiveness of such networks, however, will continue to be contingent on the independence of local press; the conversely global nature of digital journalism means that binding action must be taken to improve its whistleblower protections.

Whistleblower Reward Laws

Reward laws are highly effective in incentivising whistleblower reports. In 2015, the United States' National Whistleblower Centre identified that foreign nationals in over 83 countries have applied for whistleblowing awards and been paid over USD 30 million under its reward laws.[282] Between the False Claims Act of 1986 and 2020, whistleblower cases have brought USD 46.5 billion to the US Treasury while whistleblowers have received, in total, less than 20 percent of that figure.[283] More recently, South Korea, Ghana, Slovakia, and Canada have enacted similar reward laws. In South Korea, the National Tax Service maintains two reward programs that allow individuals to report significant tax violations. Since 2012, the frequency of these reports has increased annually, with whistleblowers being awarded an estimated USD 38.8 million in total. In 2020, Ghana introduced its continent-leading namesake Whistleblower Act, increasing possible rewards tenfold. Due to an awareness of monetary incentives, the likelihood of whistleblower reports in places where reward laws are enacted is becoming increasingly prevalent.

Case Study: Mossack Fonseca

Mossack Fonseca was a Panama-based law firm specializing in the creation of international offshore shell companies for wealthy individuals and corporations.[284] These companies were often used to reduce and subvert the tax payments of entities with high income. During April of 2016, an anonymous whistleblower using the pseudonym 'John Doe' contacted a German newspaper, providing 11.5 million confidential documents totalling 2.6 terabytes of data from the company's internal servers.[285]

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[280] "Russia's Supreme Court upholds 22-year prison sentence for journalist Ivan Safronov." Committee to Protect Journalists, 2 August 2023, https://cpj.org/2023/08/russias-supreme-court-upholds-22-year-prison-sentence-for-journalist-ivan-safronov/.

[281] "Between independence and survival Economic pressure brings global press freedom to 'unprecedented' low in 2025, says Reporters Without Borders." Meduza, 2 May 2025, https://meduza.io/en/feature/2025/05/03/between-independence-and-survival.

[282] Ibid.

[283] National Whistleblower Center. "Whistleblower Laws Around the World." NWC, https://www.whistleblowers.org/whistleblower-laws-around-the-world/.

[284] Harding, Luke. "Panama Papers source breaks silence over 'scale of injustices.'" The Guardian, 6 May 2016, https://www.theguardian.com/news/2016/may/06/panama-papers-source-breaks-silence-over-scale-of-injustices.
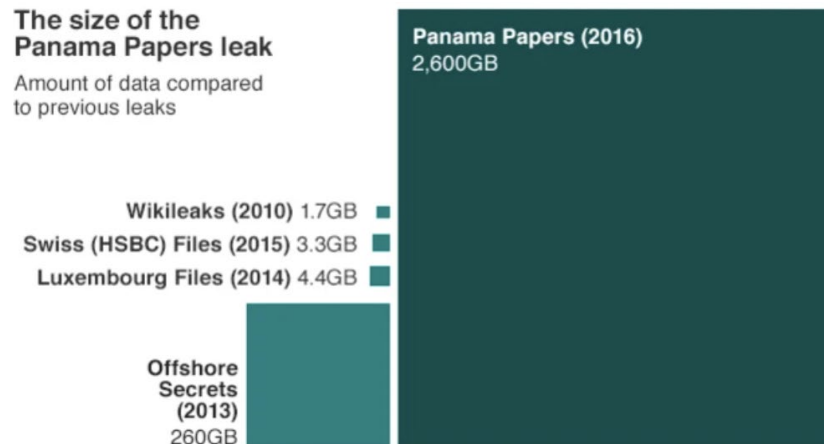
[285] Ibid.

The size of the
Panama Papers leak

Amount of data compared
to previous leaks

Panama Papers (2016)
2,600GB

Wikileaks (2010) 1.7GB ▪
Swiss (HSBC) Files (2015) 3.3GB ▪
Luxembourg Files (2014) 4.4GB ▪

Offshore
Secrets
(2013)
260GB

Figure 3: An ICIJ image comparing the size of the Panama Papers leak with other previous data leaks.[286]

These documents exposed a network of over 214,000 tax havens involving celebrities, public officials, businesspeople, and politicians from 200 different nations.[287] While offshore business entities are legal, shell corporations set up by Mossack Fonseca were revealed by reporters to have been associated with illegal purposes, such as fraud, tax evasion, and avoidance of international sanctions. This event created one of the biggest collaborations in journalistic history, as the International Consortium of Investigative Journalists (ICIJ) shared this data with 100 media organizations in 83 countries. This extensive media reporting had immediate consequence; Iceland Prime Minister Sigmundur David Gunnlaugsson immediately resigned following the discovery of his name in the papers. However, it was not until a year later that all the 214,488 offshore entities named in the papers became searchable via a database on the ICIJ.[288]

Half a decade later, the Panama Papers' revelations continue to incentivise the launch of tax probes and criminal investigations.[289] Members of Parliament in the UK repeatedly referenced the incident when passing legislation in 2017, leading them to create the country's first criminal offence for lawyers who do not report clients' tax evasions.[290] In March of 2021, five years after the case's initial findings alone, over 300 news articles referenced the Panama Papers as authorities continued to pursue investigations.[291] In a manifesto to the ICIJ, John Doe noted that whistleblowers and activists in the United States and Europe faced unjust punitive consequences after spotlighting obvious wrongdoing regarding this affair[292] The relevance of the Panama Papers to this day highlights both the importance and necessity of whistleblowers when uncovering transnational financial misconduct.

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[286] "Panama Papers: Leaks spur global investigations." BBC, 4 April 2016, https://www.bbc.com/news/world-35960329.

[287] Kenton, Will. "The Panama Papers Scandal: Who Was Exposed and Consequences." Investopedia, 12 March 2025, https://www.investopedia.com/terms/p/panama-papers.asp.

[288] Ibid.

[289] Fitzgibbon, Will, and Michael Hudson. "Five years later, Panama Papers still having a big impact - ICIJ." International Consortium of Investigative Journalists - ICIJ, 3 April 2021, https://www.icij.org/investigations/panama-papers/five-years-later-panama-papers-still-having-a-big-impact/.

[290] Ibid.

[291] Ibid.

[292] ICIJ. "Panama Papers Source Offers Documents To Governments, Hints At More To Come." International Consortium of Investigative Journalists, 6 May 2016, https://www.icij.org/investigations/panama-papers/20160506-john-doe-statement/.

Case Study: Australia

Historically, the strength of Australia's whistleblower protections has been mixed. While the nation is cited as having thorough legal frameworks among developed democracies, in practice, implementation undermines effectiveness. Recently, however, the government has begun a wider effort to expand protections; notably, the 2019 amendment to the Corporations Act of 2001 expanded private sector whistleblower protections to explicitly include anonymous disclosures.[293] These said protections also extended to former employees, contractors, and family members of whistleblowers.[294] Additionally, in December 2018, the Morrison government announced the creation of the Commonwealth Integrity Commission (CIC) after prolonged delays.[295] The CIC was proposed as an independent body that scrutinizes a politician's actions; it would serve as an oversight agency independent of major corporations and firms.[296] Regardless, the CIC was never established given major delays in drafting the bill.[297]

As demonstrated by these events, Australia's federal whistleblowing laws have historically demonstrated varied effectiveness in safeguarding whistleblowers. The Human Rights Law Centre (HRLC) released a report in 2023 examining 78 court rulings in 70 separate cases in which whistleblowers sought protection under federal and state whistleblowing regimes.[298] The report found merely 15 cases at a state or territory level where a whistleblower had been successful: a success rate of roughly one in five.[299] This low success rate demonstrated an inability to casually link an act of corporate reprisal to a whistleblower's freedom of expression.[300] Various potential consequences—whether official job threats or harms to reputation—are difficult to legally document, leading to many instances where such threat of retaliation goes unpunished despite existing legislation. Australia's continued struggle pinpoints two persisting challenges despite having legal whistleblower protections: limited access to justice and fear of unpunishable retaliation. Consequently, such barriers frequently leave whistleblowers unprotected within Australia.

Possible Solutions and Controversies

Global Whistleblower Registry

A global whistleblower registry would function as a centralized database created and managed solely under the CCPCJ. The registry would document the existence and effectiveness of enforcement across member states. In addition to maintaining records of legal statutes, the body would incorporate qualitative and quantitative measurements of implementation success. This can include criteria that evaluate the confidentiality of internal

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[293] Farmer, Peter. "Protections for corporate sector whistleblowers." ASIC, 2019, https://www.asic.gov.au/about-asic/asic-investigations-and-enforcement/whistleblowing/protections-for-corporate-sector-whistleblowers/.

[294] Ibid.

[295] Wellington, Tim. "Commonwealth anti-corruption body to cover private companies." Norton Rose Fulbright, September 2022, https://www.nortonrosefulbright.com/en-ca/knowledge/publications/02a0b4d4/commonwealth-anti-corruption-body-to-cover-private-companies.

[296] Ibid.

[297] Karp, Paul. "Commonwealth Integrity Commission: what is it and how is it different from Icac?" The Guardian, 5 October 2021, https://www.theguardian.com/australia-news/2021/oct/05/commonwealth-integrity-commission-what-is-it-and-how-is-it-different-from-icac.

[298] Knaus, Christopher, and Kieran Pender. "Australia's federal whistleblowing laws have not protected anyone since inception, analysis shows." The Guardian, 28 August 2023, https://www.theguardian.com/australia-news/2023/aug/29/australias-federal-whistleblowing-laws-have-not-protected-anyone-since-inception-analysis-shows.

[299] Ibid.

[300] Ibid.

reporting channels, the number of whistleblower reports submitted annually, and nation-wide surveys for whistleblowers to provide user feedback. Decisions based on these criteria would be determined by CCPCJ officials in consultation with member states, in which periodic assessments and recommendations would be published annually. Anonymized summaries would be made transparent to the public, which would allow policymakers to monitor trends in whistleblower protections without identifying particular whistleblowers. The aim of this registry is to provide data-driven resources to assist the public in determining which countries are enacting and enforcing proper whistleblower protections.

The contents of the registry could be modelled off the structure and influence of Transparency International (TI): a global authority in anti-corruption advocacy.[301] It will specifically take influence from TI's compilation of whistleblower data to track the progress of particular nations. TI operates through over 100 national chapters coordinated by a secretariat based in Berlin.[302] In 2023 alone, TI issued 264 legal submissions on corruption cases. Notably, according to the 2025 Whistleblower Protection Index compiled by TI, 78 countries have dedicated statutes protecting whistleblowers, yet less than 15 percent are classified as "comprehensive and actively enforced."[303] In practical terms, the registry has functioned as both a ranking system for countries' performance and a forum of knowledge regarding whistleblower practices. Contrary to TI, which is a non-governmental organization and cannot legally enforce authority over states, the CCPCJ- registry would function under the UN framework. As a result, it has legitimacy to issue compliance assessments of particular nations and offer guidelines towards enforcing protections.

This solution is highly effective where legal frameworks are already robust with enforceable protection mechanisms, as those mechanisms allow this registry to accurately reflect national improvements. The registry is also an adaptation for states with weaker protections, given the ease of requesting for technical or financial assistance to strengthen implementation. For instance, registry data could pinpoint weaknesses such as limited training budgets or digital infrastructure, giving countries a reasonable justification for targeted funding requests from the CCPCJ. However, the solution's effectiveness can be limited when states have incomplete reporting systems. This is caused in part by political and national sovereignty concerns regarding the nature of these reporting channels and anonymous surveys, potentially reducing a nation's willingness to fully participate.

Mandatory Audit Logs

Another solution to enhance whistleblower protections is the implementation of mandatory audit logs for the handling of internal whistleblower reports. This system would require organizations, particularly those engaged in high-risk sectors, to present transparent logs documenting the resolutions of past and present whistleblower disclosures. As opposed to a global standardized model, this solution establishes minimum international standards that countries can flexibly adopt the suggested policies to their legal, cultural, and socio-economic frameworks.

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[301] Transparency International. "Annual Report 2023 - Publications - Transparency.org." Transparency International, 8 August 2024, https://www.transparency.org/en/publications/annual-report-2023.
[302] Ibid.
[303] Stravinsky, Anton. "International Whistleblower Day: Who's Actually Protected?" Newstrail.com, 22 June 2025, https://www.newstrail.com/international-whistleblower-day-whos-actually-protected/.

A strong example of this solution is France's Sapin II Law of 2016, derived from the aforementioned EU Directive, along with its anti-corruption compliance program.[304] France mandates the establishment of this program for any company with consolidated sales of over EUR 100 million, which impacts 1,570 French corporations. This compliance program first establishes a code of conduct that defines the behaviours that constitute acts of corruption, which is then incorporated into the French Labour Code. Second, an internal warning system is implemented to collect employee reports of conduct breaches. Then, risk maps are used to identify, analyze, and prioritize the company's vulnerability to specific acts of corruption. Finally, assessment procedures assess and map the corruption risk of a particular supplier, intermediary, or customer involved with the company.[305]

Comprehensive auditing initiatives can improve trust between whistleblowers and their respective companies. In practice, this solution may be limited in terms of providing governments with culturally specific information to implement the frameworks into law. In states with weaker data security, audit logs could be stolen, resulting in data breaches which will diminish whistleblower confidentiality. This requirement for secure data audits makes this solution more achievable for high-capacity democratic states. If implemented, audit logs would beneficially provide an organized and digestible method for tracking whistleblower reports, which will strengthen internal accountability between employers and employees in a socio-economically appropriate fashion.

Strengthening Digital Reporting Platforms

Given the increase in digital reporting channels following the Enron scandal, this solution could widely diminish the consequences of cybersecurity breaches while allowing individuals to report misconduct confidentially. The solution will be contingent on the presence of pre-existing legal protections for whistleblowers, as it would require mandating institutions to provide secure online portals for disclosures, encrypting of all official communications, tracking updates for each whistleblower case, and creating accessible hotlines for whistleblowers. South Korea, for example, enacted its Anti-Corruption and Civil Rights Commission (PPIWA) that operates a fully encrypted online reporting system.[306] Anonymous protections are explicitly codified under the PPIWA that was created in 2011 and later amended in 2020 to grant citizens legally funded "proxy" lawyers for filing reports on their behalf in order to maintain identity confidentiality.[307]

National digital platforms are primarily funded by each nation's respective federal government, while private, internal reporting channels are supported by the companies themselves.[308] It is also important to note that increasing the amount of reporting infrastructure does not automatically equate to increased reporting. Without previously enforceable safeguards against retaliation, individuals may be reluctant to submit reports regardless of technological abundance and security. As such, there needs to be a considerable amount of organizational trust to enable a confidential environment for whistleblowers. Another potential shortcoming of this solution is its high implementation cost regarding digital infrastructure. Countries further behind in development may request financial assistance from the CCPCJ or other international bodies, opting for the construction of fewer, high-quality channels.

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[304] "Anti-corruption Compliance - Sapin II Law: The new French legal framework for the fight against corruption." Dentons, February 2017, https://www.dentons.com/-/media/pdfs/insights/2017/march/sapin-law-ii-the-new-french-legal-framework-for-the-fight-against-corruption.pdf?la=en.

[305] Ibid.

[306] "Anti-Corruption and Civil Rights Commission – ACRC." Network for Integrity, 2008, https://networkforintegrity.org/continents/asia/anti-corruption-and-civil-rights-commission-acrc.

[307] National Whistleblower Center. "South Korea's Whistleblower System." NWC, https://www.whistleblowers.org/south-koreas-whistleblower-protection-and-reward-system/.

[308] "INTERNAL REPORTING CHANNEL." Anti-Corruption.fi, https://korruptiontorjunta.fi/en/internal-reporting-channel.

Accessible Whistleblowing Training

In countries with legal frameworks in place, individuals may struggle to report wrongdoing due to a lack of knowledge on effective reporting practices. Accessible whistleblowing training is dedicated to both whistleblowers who would report misconduct and personnel responsible for receiving those reports. In practice, this solution would entail publishing multilingual educational resources curated by industry experts. For whistleblowers, training would include information about which cases are categorized as reportable misconduct, methods to access internal or external reporting channels, specifics regarding their entitled legal protections, and expectations within the reporting process.[309] For personnel in human resources or compliance officers, specialized training would include the proper method to handle reports with confidentiality and in accordance with legal obligations.[310]

Notably, the feasibility of this education as an immediate solution is challenging for developing nations with high levels of criminal activity. For instance, a 2012 report noted that Uganda registered the highest bribery levels in public sector institutions, which creates an environment where reporting mechanisms are often unaccounted for.[311] In Uganda, this education can be achieved similarly to the operations of Transparency International Uganda, which offers over 662 media programs dedicated to raising awareness in fighting corruption.[312] Regardless, high bribery levels complicate the effectiveness of such training, as anxiety about entrenched corrupt practices can overrule an individual's desire to report incidents. Additionally, this solution may not self-sufficiently protect whistleblowers and will need to be paired with responsive investigations and audits. The costs of implementing accessible education are also substantial, as it contains multilingual curricula, hiring qualified trainers, producing marketing materials, and more ongoing workshops. Thus, this solution is best applicable in developed countries where legal protections for whistleblowers are already in place, but can benefit from greater public awareness with regards to understanding how to operate the existing reporting mechanisms.

Adapting to Socio-Economic and Cultural Norms

Even when legal protections are in place, socio-economic and cultural differences can prevent individuals from reporting incidents in fear of reputational damage. This is particularly true in areas where norms around loyalty, including within the workplace environment, discourage whistleblowing. A norm-based solution supports tailoring whistleblower protections to the realities of each country, ensuring that legal frameworks are effectively applied without infringing on national interest. To begin, the CCPCJ would work with each member state to conduct studies evaluating historic trends with whistleblowing. This would include assessments regarding the nation's resource availability to check feasibility and common consequences for past whistleblowers to evaluate the likeliness of implementation. Next, nation-specific technical guidance could help countries more easily adopt benefits of implementing protections that align with national laws. Corporations could use digital case tracking to prove its legal protections for employees, gradually building trust in whistleblower systems.

In theory, this solution is beneficial for closing implementation gaps in national laws—one of the most prominent issues with whistleblower protections today. With shifting cultural attitudes that appreciate whistleblowers,

[309] WPAC. "Best Practices for Protecting Whistleblowers and Preventing and Addressing Retaliation." WhistleBlowers.gov, 21 April 2015, https://www.whistleblowers.gov/sites/default/files/2016-11/WPAC_BPR_42115.pdf.

[310] Ibid.

[311] Transparency International. "Uganda tops East Africa in corruption - Press." Transparency International, 30 August 2012, https://www.transparency.org/en/press/uganda-tops-east-africa-in-corruption.

[312] Kizito, David. "CPI Report 2024." TI Uganda, 11 February 2025, https://tiuganda.org/wp-content/uploads/2025/03/CPI-Launch-report-Uganda.pdf.

individuals are more likely to utilize reporting systems. However, in practice, shifting cultural norms is a highly gradual process and requires cooperation from each member state. This makes immediate implementation of this solution implausible. In committee, this solution could be discussed as a flexible approach that balances global anti-corruption priorities with respect for each nations' cultural differences. Delegates are encouraged to debate the extent of which international oversight should recommend changes compared to the ability for states to adapt independently. To define a set of international priorities, an existing international framework, such as the recommendations established by the UNCAC or OECD, will be a point of reference. This solution is most applicable to a wide range of countries, whether its an authoritarian governance that discourages whistleblowing or a country with legal whistleblower frameworks but still faces social barriers in individual workplaces.

Bloc Positions

Liberal Democracies with Strong Institutional Protections

This bloc includes high-income countries with politically stable liberal democracies, typically characterized by their independent judicial systems and low crime levels. In countries such as the US, Canada, Norway, and South Korea, whistleblower protection is often embedded within broader anti-corruption frameworks. Cultural acceptance of civic transparency enables corporations to implement legal frameworks into their internal codes of conduct. The active civic society engagement increases the likelihood that reports of wrongdoing are taken seriously and acted upon, which increases the perceived legitimacy of whistleblowing as both a tool of justice and as a sustainable practice.

This bloc would support strong technological advancements to encourage safe digital reporting and long-term education investments given its high-capacity conditions. Conversely, this bloc would likely oppose measures that could be used as a tool to politically suppress dissent, seeing it as harmful to civic engagement. It would also oppose secrecy within corporations and prioritize legal norms that favor transparency, as these are seen to mitigate public trust in governments, creating harms to civic engagement.

Hybrid Democracies with High Corruption

These countries exhibit elements of democracy, including elections and press freedom to an extent, but often struggle in other aspects of protection due to high levels of corruption. Many countries—including India, South Africa, Mexico, and Brazil—have formal whistleblower protection laws written and established as broad frameworks. However, due to bureaucratic inefficiency and a poor cultural attitude to whistleblowing, these protections are nullified in practice. Whistleblower laws are often passed under external pressure from international bodies such as the OECD Anti-Bribery Convention or in response to major corruption scandals.

This bloc would likely support initiatives that raise awareness about culturally accepting whistleblowers, while being cautious of solutions that require rapid implementation without local independent oversight. Specifically, it would look towards electing an independent public interest official to ensure neutral review of whistleblower cases where internal processes are ineffective. Additionally, whistleblower awareness campaigns through community organizations could gradually shift cultural perceptions on whistleblowers, likely through

partnerships with different Transparency International chapters. This could be modelled off of South Africa's Public Protector body established to address improper conduct in state affairs.[313]

States with Minimal Protections

This bloc consists of nations where whistleblower protections are either neglected or limited in practice. High-capacity states including China and Russia, while capable of implementing reporting channels, value national sovereignty and control of information over the transparency expected from current and proposed international standards. For instance, China does not have a comprehensive law dedicated to whistleblower protection outside of those aiming to combat anti-corruption efforts amongst lower-level officials.[314] In lesser-capacity states such as the DRC, Zimbabwe, or Myanmar, whistleblower protections are non-existent, leaving individuals who report corporate wrongdoing subject to retaliation.[315] For Myanmar, since the formation of a coup on February 1, 2021, the military has executed nationwide arbitrary abuses on millions of political dissidents. More than 16,000 pro-democracy supporters were arbitrarily arrested, with the Human Rights Watch organization documenting in detail the deaths of six detained activists.[316] Due to the cultural accustomation to a lack of freedom, citizens are discouraged from using whistleblower protections, regardless of availability.

These nations would prioritize non-politically sensitive sector-specific protections, if any, over broad national whistleblower laws. This could include a gradual increase in focus on anti-corruption in healthcare, although the benefits of such a program are currently inconclusive. As well, reporting systems would likely be maintained in "closed-loop" cycles, ensuring that reports are managed within the organizational hierarchy.[317] Overall, this bloc's approach reflects a preference for state-controlled measures for enforcing protection laws as opposed to general international guidelines. This preference is often a reflection of their prioritization of national sovereignty or lack of implementation mechanisms.

Discussion Questions

1. To what extent should national security override an individual's right to disclose unethical actions by the state?

2. How can international frameworks reconcile the need for cross-border whistleblower protection with different cultural, legal, and political approaches?

3. To what extent should financial incentives be used to encourage whistleblowing, and what risks do said incentives suggest about the integrity of disclosures?

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[313] Bazana, Sandiso. "South Africa's public protector has a vital watchdog role. Researcher offers tips on how the selection process can be improved." The Conversation, 16 July 2023, https://theconversation.com/south-africas-public-protector-has-a-vital-watchdog-role-researcher-offers-tips-on-how-the-selection-process-can-be-improved-209262.

[314] "Asia: Whistle-Blower protection." Herbert Smith Freehills, 15 May 2024, https://www.hsfkramer.com/notes/employment/2024-05/asia-whistle-blower-protection.

[315] Hassan, Tirana. "World Report 2023: Myanmar." Human Rights Watch, 2022, https://www.hrw.org/world-report/2023/country-chapters/myanmar.

[316] Ibid.

[317] Sean. "Closed Loop Reporting." FanRuan, 23 February 2025, https://www.fanruan.com/en/glossary/big-data/closed-loop-reporting.

4. In cases where anonymous whistleblower reports result in false accusations, what safeguards should be in place to protect the due process for the accused?

5. In authoritarian regimes, should international bodies intervene to protect whistleblowers at the cost of state sovereignty?

6. For states where private companies have tenuous whistleblower protections, what responsibilities should the UN have in pressuring these corporations to adopt internal whistleblower protection systems?

7. For developing states with weak local enforcement, how can whistleblower protections be introduced and monitored?

8. How might societies valuing conformity reframe whistleblowing as an act of serving the public interest rather than an act of disloyalty?

Additional Resources

Whistleblower Protections and International Law: https://studentreview.hks.harvard.edu/whistleblower-protections-and-international-law-protecting-the-right-to-share-government-misconduct

Li Wenliang's Whistleblowing Case in Response to Covid-19: https://pmc.ncbi.nlm.nih.gov/articles/PMC7445730/

OECD: Whistleblower Protection to Fight Corruption: https://www.oecd.org/content/dam/oecd/en/about/programmes/grc/grc-see/integrity/Policy-Briefing-Note-on-Whisteblower-Protectionvs.pdf

A Review of Whistleblower Protection in Developing Countries: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3916260

Organized Crime and Corruption Reporting Project: Panama Papers Case: https://www.occrp.org/en/project/the-panama-papers/panama-papers-whistleblower-speaks-out-shell-companies-are-putins-best-friend

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      africas-public-protector-has-a-vital-watchdog-role-researcher-offers-tips-on-how-the-selection-process-
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      scheme-works.html.

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