

**Providing an Alternative to Silence:**

**Towards Greater Protection and Support for  
Whistleblowers in the EU**

**Country Report: France**

This report belongs to a series of 27 national reports that assess the adequacy of whistleblower protection laws of all member states of the European Union. *Whistleblowing in Europe: Legal Protection for Whistleblowers in the EU*, published by Transparency International in November 2013, compiles the findings from these national reports. It can be accessed at [www.transparency.org](http://www.transparency.org).

All national reports are available upon request at [ti@transparency.org](mailto:ti@transparency.org).

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## Introduction

In France, there is neither a definition of the whistleblower nor a stand-alone comprehensive law nor public debate on whistleblowing. Sectoral laws (Labour Law, Civil and Criminal Code) did not properly protect whistleblowers, but in a piecemeal fashion guarantee freedom of expression, health and safety, or protect public and private sectors from discriminations. Any private employee has the right to report on “any imminent and grave danger” which jeopardizes his life, including a right to refuse participation, but could not disclose wrongdoing until 2007. The civil servant has the legal duty to disclose to the State Prosecutor “crimes and offences”, but without adequate protection against retaliation.

Since the 2007 *Anti-corruption Act* ([loi n°2007-1598 du 13 novembre 2007](http://www.legifrance.gouv.fr/affichTexte.do;jsessionid=BF626E28237677383CB3B788F7811FE3.tpdjo02v_3?cidTexte=JORFTEXT000000524023&categorieLien=id)<sup>1</sup>) the private employee who discloses in good faith wrongdoing is broadly protected from a wide variety of sanctions. Compensation for retaliation is limited in cases of dismissal and discriminations; financial rewards or *qui tam* would not be admitted by the legal culture. There is no independent authority that would ensure investigations or systematic data collections. Since the *CNIL Guidelines for the Implementation of Whistleblowing Systems* (2005), 2320 firms have furthermore adopted a facultative whistleblowing system, which scope was in 2010 strictly limited to financial wrongdoing. In the meanwhile, the American Sarbanes- Oxley Act (SOX) was violently taunted in the press; firms were brought into courts and protection of personal data bitterly discussed. Confidentiality is recommended, anonymous report not encouraged.

<sup>1</sup>[http://www.legifrance.gouv.fr/affichTexte.do;jsessionid=BF626E28237677383CB3B788F7811FE3.tpdjo02v\\_3?cidTexte=JORFTEXT000000524023&categorieLien=id](http://www.legifrance.gouv.fr/affichTexte.do;jsessionid=BF626E28237677383CB3B788F7811FE3.tpdjo02v_3?cidTexte=JORFTEXT000000524023&categorieLien=id)

Among the 60 countries which yet adopted comprehensive or sectoral laws on whistleblowing, this selective choice to protect the private employee but not the civil servant is peculiar to France. An OECD report on the fight anti-corruption checked recently off the lack of disclosures by French civil servants, which can be related to the insufficient protection and the dissuasive example of ostracized servants.

Cultural barriers against whistleblowing are high: whatever political (former Nazi-occupied country), religious (Catholic *primum non nocere*) or sociological (a kingly public service, a popular acceptance of the fraud). Still in 2007, a senior official described whistleblowing as Nazi denouncement or “social gangrene which paves the way of populism”. As long as no clear distinction separates the “whistleblower” (public interest) from the “sneak” (private interest), should whistleblowers remain negatively seen as “crows” (writers of poison-pen letters), “sneaks” or “informers”. Furthermore whistleblowing systems were first seen by trade-unions as “exogenous”, imported from USA (SOX) to the detriment of the unions and the advantage of investors.

In the occidental context of public interest and individual responsibility disintegration, a social and corporate demand for ethics, business ethics and corporate social responsibility increased in the 20 last years, whether *fashionable*, whether *greenwashing*, whether strong normative need from citizens and organizations in front of a globalization governed by greed.

At the bridge of social and environmental responsibility and corporate governance it tended to a formalization of ethics through corporate charters and codes before or after the SOX. It did more recently tend to a discursive will of a renovated political life.

TI France reports to enhance whistleblowing since 2004 remained confidential, but partly inspired the guidelines of the CNIL (2005), the first reports to the Labour Minister Gérard Larcher (2007) or the Environment Minister Corinne Lepage (2008), both of them issued following crises worsening. They got more coverage in the press and more support from NGO (Anticor, Fondation des Sciences citoyennes), trade-unions (CFDT cadres, Uni Global Union) or political parties (Greens) during the last presidential campaign. Increase of public scandals (AZF, Madoff, Kerviel, Mediator) and some charismatic scientists whistleblowers led very recently to change the image of the whistleblower from negative into ambivalent.

In 2007, the French Terminology and Neology Committee translated whistleblowing as “alerte professionnelle” like trade-unions. In 2008, the French Labour Ministry translated it as “dénonciation” (DGT 2008/22). NGO, Universities or press tend now like TI France to use “alerte éthique” as the disclosure involves more than employees and “signalement” as for children abuses. Research and publications remain deficient. Trade-unions published in 2005 guidelines for “unpleasant” whistleblowing systems, in 2010 a special issue about whistleblowing and best practices, in 2012 a *Manifesto for a responsible management in a time of crisis (Uni Europa Cadres)* which recommends inscribing a right to alert in international conventions. Union teams however remain negative by fear of bankruptcy and unemployment. Whistleblowing definition by TI France (2004, 2012) has been broadly adopted.

The French government unlike his partners did not yet begin to work on the subject, despite the reports Larcher (2007) or Lepage (2008), despite the Council of Europe Resolution 1729 and Recommendation 1916 (2010) and despite the commitment in the Seoul G20 Anti-Corruption Action Plan (2010) to enact and implement whistleblower protection rules by the end of 2012. Only the Green Party issued on 28 August 2012 a proposal to protect public and private employees from retaliation if they disclose with good faith serious health and environmental risks.

## 2. French legislation

In *Enhancing whistleblowing* (2004), TI France reported the lack of a right to alert in the Civil Code as well as a right to alert for wrongdoing in Labour Law ( including a right to refuse participation and the protection for the whistleblower), and the lack in Criminal Code of penalty for retaliation and interference.

While the statuses of the public administration contain provisions which should protect the civil servants who denounce criminal or punishable facts, their effectiveness remains denied. While sectoral laws protect freedom of expression, health and safety of the private employee or punish sexual or moral discriminations, there was no legal protection for the disclosure of wrongdoing until the law enacted on 13<sup>th</sup> November 2007, effective on 1st March 2008, which creates the article L 1161-1 of the Labour Law.

### ***Criminal Law / Public sector***

In accordance with [article 40<sup>2</sup>](#) of the Criminal Code, the civil servant has the legal duty to denounce to the State Prosecutor crimes or offenses he should be aware of in his office.

In accordance with [article 11](#) of the statuses of the public administration ([article 11 du titre I du Statut général des fonctionnaires<sup>3</sup>](#)) “ the Nation has the legal duty to protect civil servants against threats, violence, assaults, injury, defamation or insults that should occur within their office, and to compensate eventual damages “. For the administrative jurisprudence this list is open, and protection should include any attack.

In accordance with the abovementioned article 40, any civil servant could therefore consider that he is protected by article 11 in case of retaliation. However, TI Report underlined some limits (administrative slowness, respect for hierarchy) in 2004. A 2012 academic study <sup>4</sup> proved furthermore the discordance between article 40 and the legal duty of reserve of the

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<sup>2</sup><http://www.legifrance.gouv.fr/affichCodeArticle.do?cidTexte=LEGITEXT000006071154&idArticle=LEGIARTI000006574932&dateTexte=20080521>

<sup>3</sup><http://legifrance.gouv.fr/affichTexteArticle.do;jsessionid=33A8FC27ACC48B4D93D627976905EC06.tpdjo08v1?idArticle=LEGIARTI000024040127&cidTexte=LEGITEXT000006068812&dateTexte=20120523>

<sup>4</sup> S.Pringault : « l'obligation de réserve des agents publics face au devoir de dénonciation d'infractions pénales. Une inadaptation du droit français. *Droit administratif* n°4, avril 2012, étude 8.

civil servant and recommended the revision of article 40 in the spirit of the European human rights court. According to witnesses to courts, TI France and NGO, civil servants who disclosed illegal or dangerous facts did take early [compulsory] retirements, were dismissed or ostracized and contract workers (20% of the personnel) not renewed or dismissed without possible reinstatement.

The *2007 Anti-corruption Act* should be extended to the public sector, or the statuses of the public administration (guaranties) completed by an article 6 septièmes that would protect civil servants from retaliation or any discrimination in case of whistleblowing, as article 6 to 6 sixièmes do from other discriminations.

### ***Labour Law / private sector***

- The *2007 Anti-corruption Act* ([la loi n°2007- 1598 du 13 novembre 2007 relative à la lutte contre la corruption<sup>5</sup>](#)),

effective 1st March 2008, gives protection from any retaliation or discrimination to employee of the private sector as well as industrial and commercial public bodies (EPIC), who reports with good faith wrongdoing (article L 1161-1).

The scope of this protection includes recruiting procedures. The burden of proof lies with the employer to show that the reprisal is not related to the disclosure (reverse burden of proof).

The law does not mention or define « whistleblowing » or « whistleblower ». The law does not precise “wrongdoing” (faits de corruption). No protection of the identity of the whistleblower. No mention to internal or external reporting channels. There is no independent authority that would ensure investigation and follow-up, or data collection or independent review. No jurisprudence is available.

- Other laws (partial rights to alert)

In accordance with article L4131-1 of the Labour Law the employee has the right to alert his employer about “any grave and imminent danger for his life and health”, including the right to refuse participation. In accordance with article L4131-2, the staff representative in the Comité d’hygiène, de sécurité et des conditions de travail (CHSCT) has the legal duty to alert the employer in case of any grave and imminent danger.

In accordance with article L2113-2 any staff representative has the right to alert the employer about any attack against “personal rights, physical or mental health or personal freedom in the firm” as well as to investigate with the employer and bring if necessary the case before the court (Tribunal des Prud’hommes). In its report 2004, TI France recommended to apply this right to any employee and extend the alert to wrongdoing.

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<sup>5</sup>[http://www.legifrance.gouv.fr/affichTexte.do;jsessionid=BF626E28237677383CB3B788F7811FE3.tpdjo02v\\_3?cidTexte=JORFTEXT000000524023&categorieLien=id](http://www.legifrance.gouv.fr/affichTexte.do;jsessionid=BF626E28237677383CB3B788F7811FE3.tpdjo02v_3?cidTexte=JORFTEXT000000524023&categorieLien=id)

In accordance with article L2323-78 the works council has an economic right to alert the employer about facts “that could deeply damage the economic situation of the firm”. The council has the right to report to the employer and the auditor.

There is also a right to alert in case of harassment ([article L1152](#)) or discrimination ([article L1132](#)).

## ***Financial code***

Specific procedures exist in the banking system as the notification of suspicion : [la déclaration de soupçon](#) to the independent authority TRACFIN<sup>6</sup> (articles [L.561-1](#), [L.562-1 to L.562-10](#) and [L.564-1 to L.564-6](#)) according to the [European directive 2005/60/EC of the 26 October 2005](#)<sup>7</sup> transposed into French law by [Order n° 2009-104 of the 30 January 2009](#)<sup>8</sup>.

## ***Whistleblower systems and the CNIL (2005, 2010, 2011)***

According to the French data protection authority (Commission nationale de l’informatique et des libertés or CNIL) « a whistleblowing system is a system (phone number, email, web form) enabling employees to report on wrongdoing”, in compliance with the French Data Protection Act of 6 January 1978, as amended in August 2004, relating to information technology, data filling systems and liberties ([loi n° 78-17 du 6 janvier 1978](#)<sup>9</sup>).

Whistleblowing systems are “neither allowed nor banned” by French Labour Law, but are subject since 2005 to a requirement of prior authorization by the CNIL since personal data are collected and processed. They must be facultative and complementary with other resorts (staff representative, auditor, labour inspector).

Within the simplified notification procedure or so called Unique Authorization of 2005 ([AU-004](#))<sup>10</sup>, their scope is limited as follow: accounting, finance, banking issues, the fight against bribery, anti-competitive practices (a new issue added in 2010). Any company wishing a broader scope will need to be authorized specifically by the CNIL. (Discrimination was added in 2011 in individual authorization in accordance with the *Label Diversité*).

The CNIL had no objection in principle to such whistleblowing schemes, “provided the rights of individuals directly or indirectly incriminated through them are guaranteed with regard to personal data protection rules. In fact, such individuals, in addition to the rights which they are granted under labour law if disciplinary actions are initiated against them, are entitled to

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<sup>6</sup> <http://www.economie.gouv.fr/tracfin>

<sup>7</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2005:309:0015:0036:fr:PDF>

<sup>8</sup> <http://www.legifrance.gouv.fr/affichTexte.do;jsessionid=19ECE43F9023EF8716BFFE50EBA3D6BB.tpdjo03v2?cidTexte=JORFTEXT000020176088&dateTexte=20090131>

<sup>9</sup> <http://www.legifrance.gouv.fr/affichTexte.do;jsessionid=DE371AA70291C04E4DF21B3CF88BD7B8.tpdjo02v3?cidTexte=LEGITEXT000006068624&dateTexte=20120523>

<sup>10</sup> <http://www.cnil.fr/en-savoir-plus/deliberations/deliberation/delib/83/>

specific rights under the French Data Protection Act or under Directive 95/46/EC of 24 October 1995 when data relating to them are processed : right to such data being collected fairly; right to be informed that such data is being processed (article L1321-3, Labour Law); right to object to such processing for legitimate reasons; right to have any inaccurate, incomplete, ambiguous or outdated information rectified or removed”.

Therefore in the name of the law 1978 and worker privacy, the CNIL first refused in 2005 two systems whereas they may exclude individuals from the benefit of a right or of their employment contract in the absence of any specific legal provision. Therefore trade-unions opposed to these schemes. This opposition did in peculiar not allow firms to comply with international conventions against corruption as well as with the American SOX. Through TI France and The corporate responsibility observatory intercession, a *modus vivendi* was found and the simplified notification procedure AU-004 adopted on 10<sup>th</sup> November 2005, with a set of rules<sup>11</sup> in accordance with [article 25-I 4<sup>12</sup> of the French Data Protection Act](#).

Although the CNIL mentioned that these systems should primarily dedicated to accounting, finance, banking and bribery issues, in 2005 the CNIL also added any violation in general which would be detrimental to the company or to “the moral or physical integrity of its employees”. This relative broad interpretation was challenged by the French case-law: in particular, on December 8, 2009 the French Supreme Court (Cour de Cassation) ruled severely against the firm Dassault. With its October 14, 2010 deliberation, the CNIL removed consequently from the permitted scope of reporting this provision that has caused misunderstandings (and court actions). In fact, although whistleblowers systems and the American SOX were harm attacked in the press and by trade-unions, courts actions were all brought in cases where they extended beyond the (financial) scope of the CNIL (or the SOX) including for example behaviors.

Conditions for the AU-004:

- a complementary scheme, with limited scope, allowed only in 5 cases in accordance with the [article 7 of the law 1978](#). Among them, *legitimates interest*.
- a facultative (not compulsory) one ; no sanction against the worker ;
- legal extensive information : categories of personnel affected by the system, identity of the responsible , scope, sanctions against slanderous accusations (article 32) ;
- respect of the rights to object and rectify ([articles 39](#) and [40](#)) ;
- international cooperation : any transfer of data to a country must provide an equivalent level of data protection to the UE;
- limited data storage period (2 months), immediate destruction of unsubstantial reports

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<sup>11</sup> [http://www.cnil.fr/fileadmin/documents/La\\_CNIL/actualite/CNIL-docori-10112005.pdf](http://www.cnil.fr/fileadmin/documents/La_CNIL/actualite/CNIL-docori-10112005.pdf)

<sup>12</sup> [http://www.legifrance.gouv.fr/affichTexteArticle.do;jsessionid=FF1B7F19EAE0446E18D0C39213BE6C71.tp djo02v\\_3?idArticle=LEGIARTI000006528109&cidTexte=LEGITEXT000006068624&dateTexte=20080522](http://www.legifrance.gouv.fr/affichTexteArticle.do;jsessionid=FF1B7F19EAE0446E18D0C39213BE6C71.tp djo02v_3?idArticle=LEGIARTI000006528109&cidTexte=LEGITEXT000006068624&dateTexte=20080522)



Slandorous accusations are punished in accordance with the article 226-10 of the Criminal Code. Regarding the duty of loyalty towards the firm (article 1382 of the Civil Code), the Supreme Court (Cour de cassation) by a decision on July 12, 2006 admitted the disclosure of wrongdoing by an employee in cases where wrongdoing is proved or report made in good faith.

Since 2005, the AU-004 under the control of the CNIL allows compliance with the section 301(4) of the SOX and since 2010 with the so called "Japanese SOX". It does not allow the compliance with the *Anti-Bribery Act* (UK, 2012)

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In conclusion, regarding TI guidelines for whistleblowing legislation as well as Council of Europe Recommendation 1729 (2010), the French whistleblower legislation is late (2007) and limited, both limited to the private sector and, in the private sector, to the financial field.

### **3. Perceptions and political will**

Within a culture in which disclosure is usually seen as denouncement, three periods can be distinguished in public perception and press:

- relative indifference and silence in the time 1990 to 2005 when companies adopted ethics charters and codes (with participation of unions), with the aim of improving corporate responsibility and risk management;
- violent public vomiting and press outcry from 2005 to 2009 against whistleblowing and systems made obligatory by the American SOX; court actions before and after the CNIL Unique Authorization (mostly from unions) against whistleblowing systems which in fact extended far beyond the financial scope of the SOX or the AU-004 and seemed to attack human rights and worker privacy and dignity;
- public and press ambivalence since 2010 due to financial and environmental crises increase and to positive figures of some whistleblowers (mostly scientists) ; recent reversal of opinion due to the Mediator case and the doctor Irène Frachon.

In the gap of the law and confronted with brutal management changes and crises (complexity, elite crisis, truth crisis) due to globalization, some French firms adopted since 1990 ethics charters and codes, with the aim of improving corporate governance, corporate social and environmental responsibility and risk management. In this trend of ethics formalization strengthened by scandals as Enron, TI France issued its report *Enhancing whistleblowing* (2004). Through the American SOX, because of its press outcry in 2005,

charters and codes got control and restriction with the AU-004 of 10<sup>th</sup> October 2005 – in peculiar if whistleblowing systems became obligatory (American subsidiaries and rated firms), and even if anterior charters remained leaning against internal codes.

Confronted with this gap of the law and the so-called maladjustment of whistleblowing to French culture, confronted with the press violence illustrated by titles as « the right to sneak will not cross the Atlantic Ocean », the Labour Minister Gérard Larcher ordered the 21<sup>th</sup> of December 2005 a report on *“Ethics charters, whistleblowing and French law”* with the aim of making regulations, report partly inspired by TI France proposals and that issued on January 2007. On 13<sup>th</sup> November 2007 the first whistleblowing legislation (private sector) was enacted. In 2008, a General Directive was issued by the Labour Ministry. In the meanwhile, firms with whistleblowing systems extended beyond accounting and financial scope, within the CNIL Unique Authorization or not, were brought to courts. The CNIL modified consequently in 2010 its Unique Authorization, removing “the vital interest of the business or the physical or moral integrity of employees”. Anonymous reports and hotlines were reviled. On the other hand, whistleblowing systems adopted with participation of multiple actors were held up as examples (like the Shell’s which associates human resources, unions and an external deontologist). Iterative partnership with trade-unions and attention to corporate culture should be, with protection of individual liberties, the stumbling block for these whistleblowing systems to be agreed.

According to the CNIL (2012), 2320 French firms have adopted whistleblowing systems. In a study of 26 June 2008, CNIL reported the poor use of these systems. There is no updating of the data, no review is available. No case-law is available in accordance with the *Anti-corruption Act* of 2007 and the article 1161-1 (Labour Code), even if dissuasive effect of the law is predictable.

We are yet since 2010, after indifference and outcry, in an ambivalent phase due to crises worsening and some French emblematic figures of scientists whistleblowers (Cicollella against glycol ether, Ménéton against the salt lobbies, and Irène Frachon against Mediator medicine). The report Lepage (2008), issued from the political *Environmental Grenelle*, still prepared public opinion to the necessity of a right to alert – with this so damageable fragmentation of a right to alert by field. No law was consequently enacted. The medical Mediator case, as public health case and because of its charismatic spokeswoman, should mark the reversal of public opinion in favour of a right to alert in the fields of health and safety, or the right to alert.

French press, so harsh from 2005 to 2009, even if some “incorruptible” figures of whistleblowers were sporadically outlined in newspapers, brought into the light in 2010 - 2012 whistleblowers figures, as witnesses through public radio and televisions, witnesses of fights and ruined carriers and lives in public and private sectors. Some articles, some reports were published both on whistleblowing and whistleblowers. TI France issued in 2012 a statement about whistleblowing since 2009. French trade-unions signed at the European level the 2012 *Manifesto (Uni Global Cadres)* recommending the right to alert in international conventions, even if their teams remain reticent to the point to recently counsel the national publication of a guide for a responsible alert. Employment remains the essential concern, the “crow” disliked. If some foreign blockbusters or legendary movies

magnified whistleblowers, only a French TV film with low ratings reported on the story of Alain Cicoella.

In public administration, the Magistrature Superior Council and the Council of State issued in 2010 and 2011 ethics charters (*Recueil des obligations déontologiques des magistrats*, *Charte de déontologie des membres de la juridiction administrative*), but no revision was planned of the public administration statuses. At last, administrative law has published in April 2012 its first whistleblowing case study, which concludes with the incongruity of the French law and its necessary revision.

French government is mute since Larcher and Lepage reports (2007, 2008) and despite the commitment of the Seoul G 20 Anti-corruption Action Plan (2010) to enact and implement whistleblowing rules by the end of 2012.

#### **4. Strengths, weaknesses and recommendation**

To sum up, in a context of ambivalent perception, France has a sectoral approach of the right to alert and whistleblowing legislation, fragmented by field, a sectoral reflection within public administration, fragmented by body, an imprecise whistleblowing legislation for the private sector (2007), ethics charters and facultative whistleblowing systems for private sector (2005), no whistleblowing legislation for the public sector, ethics charters without whistleblowing systems adopted by some Ministries (2007-2009), then public bodies (2010, 2011), then National Assembly (2011), a nascent academic research, a faint reversal of public opinion and a discontinuous political will.

Our recommendation is that following the reports of Transparence France (2004), Antonmattéi-Vivien Larcher (2007) and Lepage (2008), in accordance with Transparency International Whistleblowing Guidelines (2009) and the Council of Europe Resolution 1729 (2010), France would enact a single comprehensive stand-alone law “covering the public, private and not-for-profit sectors, providing for reporting channels to communicate concerns and for independent review”, and extend the scope of the whistleblowing systems (to human rights, health and safety, environment).

Among the international whistleblowing laws, the most clear and complete remains the *Public Interest Disclosure Act* (RU, 1998).

A independent authority should be instituted.

A Whistleblowing Center as Public Concern at Work (UK), the GAP (USA), FAIR (Canada) or Whistleblower Netzwerk (Germany) should be opened. The tragic condition of the French whistleblower, without any institutional support, could be one of the worst's in Europe.

In a hostile (ambivalent) context, steps therefore will be necessary (culture, law):

- education and formations in and from government, public and private sectors, press and NGO starting with the official distinction between the whistleblower (public interest) et informer (personal profit) ;
- a cultural evolution of public administration (end of omerta and vote-catching);
- extension of the right to alert the authority in the Civil code the any citizen ;
- revision of the article 40 of the Criminal Code with the approach of the European human rights court;
- precision (protection of identity, channels, follow up) of the *2007 Anti-Corruption Act* , and extension to the public sector with addition in the administration statuses of article 6 septies (guarantee to protect whistleblowing from retaliation);
- investigation and follow up of WB cases by the Mediatory of the State (Médiateur de la République) waiting for an independent authority. The Mediatory does not actually have the right to investigate in peculiar in cases of civil servants.

The last both procedures should be consider as an emergency.

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## V. Charts.

Loi n°2007-1598 du 13 novembre 2007 relative à la lutte anti-corruption

	Yes	No	Partial	Notes
Broad definition of whistleblowing		x		
Broad definition of whistleblower		x		No mention. An employee who reports on corruption
Broad definition of retribution protection				
Internal reporting mechanism			x	No mention
External reporting mechanism			x	No mention
Whistleblower participation				No mention
Rewards system		x		Against legal culture
Protection of confidentiality				No mention
Anonymous reports accepted				Against legal culture, but no mention
No sanctions for misguided reporting	x			In good faith
Whistleblower complaints authority	x			
Genuine day in court		x		
Full range of remedies	x			
Penalties for retaliation		x		
Involvement of multiple actors				No mention