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The Accountability and Transparency of Whistleblowing Platforms

Issues of Networked Journalism and Contested Boundaries

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ABSTRACT

WikiLeaks has often been criticized for being an organization seeking transparency without being transparent and accountable itself. The paper aims to shed light on how whistleblowing platforms understand transparency and accountability with regard to their own activities and how and whether they implement online-based practices of accountability and transparency. Drawing on the conceptual model of online media accountability developed by Domingo and Heikkilä, the paper analyzes four whistleblowing platforms: the Hungarian MagyarLeaks, the Dutch PubLeaks, the Italian IrpiLeaks and the German Briefkasten of the weekly newspaper Die Zeit. This study is based on a two-step methodological approach, applying first a document analysis of publicly accessible information on online practices of accountability and transparency; second, we present findings from in-depth interviews with selected editors from each whistleblowing platform. The study critically discusses the evidence of specific challenges with regard to actor and process transparency relating to the platform's rationale. In addition, responsiveness does not appear to be a core practice, given that interaction with the audience is generally left to the news media partners, where the leaked material is published. The findings show that whistleblowing platforms have developed unevenly in terms of accountability and transparency.

KEYWORDS

Whistleblowing, Hacking, Journalism, Accountability, Transparency, Boundaries

Introduction

Although it is still object of scholarly analysis, the specific impact of WikiLeaks on the nature and practice of journalism has been dubbed as powerful and totalizing (Wahl-Jorgensen 2014). Bruns (2014) described WikiLeaks as a “media innovation” able to influence both media practice and technology by acting as a crossroad between the older culture of whistleblowing and Web 2.0 technologies. For instance, WikiLeaks pioneered a new concept for whistleblowing by introducing a digital dropbox leakers could use to submit online documents and information anonymously. These services allowed not only whistleblowers to get their documents published, but served journalists as well to gain access to leaked documents. This has become relevant, as surveillance against communication between investigative journalists and their sources has grown into a central issue in journalism. Particularly in the wake of Edward Snowden's leaks on the activity of the US National Security Agency (NSA), the debate about privacy and the adoption of safer encryption-based digital tools for journalists have become relevant.

At the same time, however, there have been repeated calls for greater accountability and transparency, not just in relation to the journalistic production process (Porlezza and

Splendore 2016), but increasingly also with regard to whistleblowing platforms: In late 2016, WikiLeaks was at the center of a controversy concerning some of its latest document releases. In particular, Julian Assange's organization was criticized with regard to the publication of the "AKP email database", a leaked cache of emails WikiLeaks attributed to Erdogan's governing party.ⁱ One of the strongest criticisms that sparked a clash on Twitter came from Turkish scholar Zeynep Tufekci (2016), who claimed in an *Huffington Post* article that the leaked documents contained information about Turkish private citizens. Later on, WikiLeaks promoted another leaked database on Twitter containing personal information about numerous Turkish female citizens.ⁱⁱ WikiLeaks responded bleakly to the critique, among others also from Edward Snowden, with a harsh tweet that caused an outrage (Peterson 2016). The way WikiLeaks handled criticism lately – alienating the organization also from long time supporters – highlights how accountability and transparency are crucial aspects for whistleblowing platforms as well, particularly when it comes to their public support.

As such, we suggest that the growing influence of whistleblowing on the way journalism is carried out (Landert and Miscione 2017) forces us to rethink of how these platforms deal with questions of accountability and transparency. After all, whistleblowing platforms by definition try to foster and boost transparency in society by facilitating or granting access to leaked data - acting as a "necessary counter-action to anti-democratic (or anti-truth...) forces in the modern world" (Marlin 2011, 5). We therefore define whistleblowing according to Miceli and Near (1992) as "the disclosure by organization members of illegal, immoral, or illegitimate practices under the control of their employers, to persons or organizations that may be able to affect action." However, whistleblowing has recently come under certain (political) pressure: There is an ongoing "bitter debate between online privacy and transparency" (Brevini 2017, 1), often also with regard to the platforms' understanding of transparency as, lately, WikiLeaks seems to fall for irresponsible behavior by endangering lives, which caused some journalists to reflect upon their intent to collaborate (Elliott 2013).

The issues around accountability and transparency of whistleblowing platforms refer to two different dimensions: a) the way how source material is handled and, subsequently, made available to the public and b) the way platforms manage criticism and respond to possible allegations coming from the public. Building on the work by Domingo and Heikkilä (2012) on online media accountability practices, we analyze the accountability and transparency of four whistleblowing platforms. In considering whistleblowing platforms as a new actor in the field of journalism, we also imply that much of the existing research on ethical issues of whistleblowing platforms emphasizes the focus on a "new digital culture of disclosure" from the perspective of democratic accountability - but it omits questions about the accountability and transparency of the whistleblowing platforms themselves. As such, our focus moves away from the social implications of these platforms and instead considers how they deal with transparency.

We do so by applying the theory of boundary work (Gieryn 1983), relying mainly on Carlson's and Lewis's (2015) adaptation in journalism studies. Following, we also add to empirical knowledge by carrying out a document analysis of publicly available documents on the platforms' websites with regard to their rationale, the way they handle leaks and how they intend to publish the received data. In addition, we carried out qualitative interviews with representatives (one person for each platform) working for the platforms. Overall, the paper wants to shed light on the following three research questions:

1. How transparent are whistleblowing platforms in relation to their activities?
2. How responsive are whistleblowing platforms when it comes to the public's concerns and critique?

3. And how do whistleblowing platforms understand their relation to professional journalism as a field?

The three research questions reflect three dimensions of accountability and transparency: first in relation to the management of the leaked documents, second regarding the responsibilities for the publication in the case of collaborations with news organizations, and third regarding the platforms' dialogue with the audience. These three dimensions are assessed in parallel, given that we analyze the accountability of whistleblowing platforms with regard to the whole spectrum of activities. It is therefore important to underline how transparency and accountability is related to the platforms' relationship with their sources, news outlets, and their publics.

In the following part, the article will discuss the theoretical framework with regard to the whistleblowing platforms' role in the new media ecosystem. After that, we present a discussion of the main theoretical tenets of media accountability and transparency. Thereafter, the article presents the methodology used to analyze the accountability and transparency of the four whistleblowing platforms. In the findings we will present the results of our investigation of the document analysis as well as the problem-centered interviews with selected collaborators of the platforms. In the conclusions we will then offer a brief summary of our work, together with a wider discussion of the findings and their implications for the normative framework of whistleblowing platforms, given that they have occupied a strategic position between sources, publishers, and the public.

Literature review: Whistleblowing platforms and the field of journalism

Journalism and, in particular, online news production has been affected by radical transformations (Siles and Boczkowski 2012). One of these changes concern the fact that there are distributed but interrelated information practices of different actors that may not necessarily see themselves as professional journalists, creating thus a "hybrid" media system (Chadwick 2013). In such a networked media environment, there is no single or orthodox understanding of journalism, but different actors may follow different practices, norms, role perceptions and motives. The notion of networked journalism, nowadays, goes therefore beyond its original understanding of a broader inclusion of audience members into the news production (Beckett 2008). Whistleblowing platforms represent an example of such a "new" actor entering the journalistic field.

According to Bourdieu, a "field" is understood as a segment of cultural production put in relationship with other fields of society, such as politics, economics and technology. In the French sociologist's conceptualization, fields are fluid and relational. Journalism is a particular example of such a fluid and therefore weak field, also because it is prone to external pressures. Particularly when it comes to the pressures exerted on the field, this approach can be combined with the "boundary work" theory (Gieryn 1983), showing that different fields can somehow overlap (Carlson 2015, 5-6). This becomes apparent if we take into account that the "networked press is not a single entity with recognizable boundaries and agreed upon norms (if such a press ever existed at all)" (Ananny and Crawford 2015, 3). In such a networked environment, actors can not only share knowledge and learn from each other, but they can also integrate new technology of all actors in the network, which means from both journalists and non-journalists alike (Powell 1990). Bourdieu's conceptualization of technology takes this into account by focusing on the co-creation of technology by its makers and users (Sterne 2003). In this new media ecosystem, new actors such as whistleblowing platforms do become important actors as they influence - without being journalistic actors themselves - the conditions under which journalism is actually produced.

The field of journalism has thus seen its borders being pierced by both actors and technological elements coming from the hacking field - a field with its own distinct doxa. WikiLeaks' submission system represents an important step ahead in the digitalization of the whistleblowing process and in the emergence of hacker elements in the journalistic field, something that showed "how successful it could be in highlighting the affordances of new media technologies in facilitating whistleblowing at an unprecedented scale" (Bruns 2014, 15f). Hence, the platform's structure is now mirrored by more than 80 whistleblowing projects that are replicating a similar approach thanks to the use of free and open source software, mainly SecureDrop and GlobaLeaks. The major leaks published by WikiLeaks in 2010 have inspired a wave of other whistleblowing platforms that have pushed forward the original model by adopting different strategies and attitudes in regards to digital whistleblowing. New models and approaches to whistleblowing platforms have emerged and organizations of different kinds - including investigative journalism collectives and mainstream news organizations - are now using encrypted whistleblowing software to securely solicit and attract leaks. Research results have also found out how platforms launched after WikiLeaks tend to consider Julian Assange's organization as a source of inspiration in principle, but not a model to replicate in their editorial strategies or journalistic outcomes (Di Salvo 2020, 137-153). In particular, newer whistleblowing platforms distance themselves from the "publish everything" approach of WikiLeaks and look for other more balanced strategies (Di Salvo 2020, 148-150). Overall, Di Salvo has proposed a taxonomy of existing whistleblowing platforms based on four different groups: "publishing", "collaborative", "multistakeholder" and "media" platforms (2020, 103-107)

Overall, WikiLeaks and the other digital whistleblowing platforms based on GlobaLeaks or SecureDrop demonstrate that the journalistic field has been expanding beyond its own boundaries and has brought in some "alternative" actors like hackers, data analysts or data activists. Albeit hacking and whistleblowing are often used as synonyms, they have different meanings. While whistleblowing focuses on the disclosure of illegal, immoral, or illegitimate practices (Miceli and Near, 1992), "hacking" is a concept carrying various definitions, and it can also be connected to various practices, social groups and activities. Frequently, the notion of hacking gets associated with cybercrime, cyberterrorism or other illegal activities, such as cracking and other forms of malicious cyber-attacks (Vegh 2005). In this context, we refer to hackers as people using software and coding "to take social and cultural action" (Jordan 2007: 67) in terms of open source coding or hacktivism. In the case of whistleblowing platforms, for instance, hackers are the coders of encryption software - such as GlobaLeaks and SecureDrop - created purposely for journalists in need of adopting anti-surveillance information security practices. Whereas hacktivist groups active in the field of anti-surveillance and pro-privacy activism have traditionally adopted these technologies as strategies, they are relatively new to journalists and the public (Coleman, 2019). Thus, hackers are now part of the journalistic field as carriers of new technology and practices and also as potential sources (Di Salvo 2017). In various instances, hackers have provided source material to journalists or have made public documents and data stolen via various cyberattacks, as it has been in the case of the Democratic National Committee in the US during the 2016 Presidential campaign (Marmura 2018). This scenario brings crucial questions to journalists in regards of sourcing and related ethical issues: whereas these "hacker sources" (Di Salvo 2020) may have some point of contacts with whistleblowing, they certainly do not overlap, especially when it comes to how the materials can be gathered, obtained and diffused. Whereas dealing with controversial sources is not new to journalists, these grey zones between leaking, cybercrime hacking and cyberwar are a new territory for journalists, where again the journalistic and the hackers fields come together. One of the cornerstones of this kind of networked journalism,

according to Russell (2016, 151), is that it relies upon accountability generated by *different* actors within the field of journalism.

The concept of media accountability

The concept of media accountability refers not only to the media's general responsibility towards society, but focuses on the media's wider obligations for the quality of their contents and performances towards their stakeholders and, specifically, to their publics (de Haan and Bardoel 2011; McQuail 1997, 2003, 2010; Plaisance 2000; Pritchard 2000; Fengler et al. 2014; Porlezza and Splendore 2016).

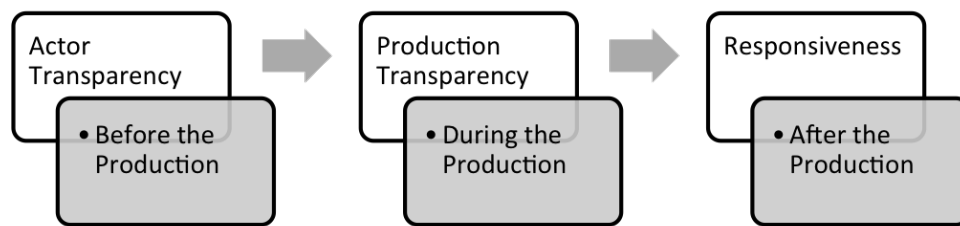
Accountability transcends therefore the narrow focus on responsibility, instead it includes the question of how this responsibility is implemented with respect to the specific stakeholders. Hodges (cit. in McQuail 2010, 181) makes for a renowned distinction between responsibility and accountability by stating that "responsibility has to do with defining proper conduct, accountability with compelling it". Bardoel and d'Haenens (2004) refer to these obligations when they discuss, within a larger framework, the notion of public accountability. The concept signifies an active commitment towards a more participatory role in society, given that it entails a voluntary self-regulatory approach, while respecting the principle of press freedom.

Thanks to the Web, the relationship between the media and the audience has become closer. This is also true for whistleblowing platforms, which are intrinsically dependent on the contributions of leakers. It is at this point that the concept of responsiveness becomes relevant. This means that platforms not only take into account the public's concerns and criticisms, but react to it and show engagement – what Brants and de Haan (2010, 416) call civic responsiveness: "taking the public into account by listening and connecting with the public and putting their agenda first." Civic responsiveness is central to this analysis given that whistleblowing platforms are usually not active in the market, which is also demonstrated by the organizational structures of the whistleblowing platforms organized as collectives or foundations. Whistleblowing platforms act therefore as "moral entrepreneurs" (Brants 2013, 25), siding not only with the whistleblowers, but also with the audience, in an activist orientation, supporting victims of prosecution and surveillance, often through a government critical discourse supporting democratic accountability.

Because we refer here to platforms being used for investigative reporting, the journalistic performance is often conducted with a strong "adversarial" attitude (Zelizer and Allan 2010, 2) towards powerful organizations. The goal of these actors in the field is, as Russell (2016) pointed out repeatedly, to generate accountability and to expose misbehavior conducted against less powerful actors of society, independently of whether there are any traditional news outlets involved or not. This is similar to what happens with other hybrid forms of reporting, such as data journalism, where journalists have developed their own specific performativity (Borges-Rey 2017) or "counterculture" (Di Salvo 2017).

The difference between public accountability and responsiveness is explained by de Haan and Bardoel (2012, 18) as follows: "The former relates to acknowledgement of public concern by engaging, participating and showing involvement, while the latter means being held accountable by the public for one's performance." On the other hand, what connects both concepts is the fact that they are not bound to rigid structures, but they need to be understood as a process (McQuail 2010). Grounded on this approach, Domingo and Heikkilä (2012) developed a model to assess online media accountability that follows the different steps in news production. They looked at different practices that happen *before* the production, *during* and *after* the production (see figure 1).

Figure 1: Digital Media Accountability Model (based on Domingo and Heikkilä 2012)



The three phases look at specific practices in relation to what online media are doing in terms of transparency and responsiveness. The first phase focuses on *actor transparency*, where the actors reveal who owns the organization and what kind of principles and norms, expressed in mission statements or ethic codes, they abide to. The second step looks at production transparency, where actors mainly explain to their publics how the news production is done. The third aspect includes responsiveness, where news organizations are supposed to be open to user feedback and criticism, and establish a dialogue with the audience thus “rendering this interaction meaningful to the public” (Heikkilä et al. 2012, 55). This model is also suited to evaluate the accountability of whistleblowing platforms, even if some of the practices included in the original concepts such as source transparency, links to sources or collaborative story writing cannot be applied. Particularly the tripartition of accountability along the (news) production of the platforms is suitable to establish an overall evaluation of the transparency and responsiveness of whistleblowing platforms in the light of the growing calls for more openness.

Methodology

The growing concerns about investigative journalism and surveillance have made it necessary to take a closer look not only at how journalists are able to protect their sources from being uncovered and exposed, but also at how whistleblowing platforms are behaving in an increasingly networked field that puts greater emphasis on being responsive. In our paper we will analyze four case studies we define as “whistleblowing platforms”. All platforms were launched after the initial success of WikiLeaks: IrpiLeaks (Italy), MagyarLeaks (Hungary), PubLeaks (Netherlands) and *Die Zeit*’s Briefkasten (Germany) and they are instances of different groups of Di Salvo’s taxonomy of whistleblowing platforms (2020):

IrpiLeaks is a “collaborative” whistleblowing platform based in Italy and operated by journalists who are members of the Investigative Reporting Project Italy (IRPI) group. IrpiLeaks was the first whistleblowing initiative launched in the country in October 2013. The platform is used by the IRPI team as a source of materials for its own reporting which is usually published on partner news outlets IRPI members pitch their articles ideas to.

MagyarLeaks is a “publishing” whistleblowing platform operated by the Budapest-based Atlatszo, an NGO and investigative news outlet focusing on transparency and freedom of information in Hungary. The platform is one of the tools Atlatszo uses for investigative newswork, being responsible also for the FOIA requests software Kimittud and the crowdfunded platforms Fizettem that citizens can use to report everyday instances of corruption.

PubLeaks is a Dutch “multistakeholder” platforms operated by the PubLeaks Foundation. It has a different approach in relation to leaks. In fact, PubLeaks has signed partnerships with about 40 Dutch news outlets ready to receive leaks. In the PubLeaks paradigm, a whistleblower using the platform can decide which news outlet should receive the material. The PubLeaks team only provides the technological infrastructure and is involved in the handling of the leaks only upon request of the whistleblower.

Briefkasten, instead, is the whistleblowing platform of the German daily *Die Zeit* and was launched in the summer of 2012, making the newspaper one of the early adopters of digital whistleblowing submission systems. In order to launch its own whistleblowing platform, *Die Zeit* coded Briefkasten internally, and the software is now used exclusively by the newspaper investigative unit, although being available online as open source code.

All platforms, despite having their technological roots in the model that WikiLeaks pioneered, are different from Assange's organization. IrpiLeaks, MagyarLeaks and PubLeaks are independent journalism collectives and based on foundations. Instead, *Die Zeit's* Briefkasten is part of an established German news organization. Despite the differences, the selected case studies present the same rationale as they describe themselves as platforms for whistleblowers willing to leak sensitive information – but they do it in different ways. The four case studies were selected in order to reflect the heterogeneity of whistleblowing platforms in terms of their organizational structure and their strategies: with the exception of *Die Zeit's* Briefkasten, which runs a self-coded software, the other three platforms operate with the GlobaLeaks software to guarantee anonymity. Secondly, this selection aimed at comparing whistleblowing platforms operated by a mainstream news outlet (*Die Zeit*) and others, owned by smaller and less institutionalized organizations (such as Investigative Reporting Project Italy, IRPI). Since most research until now has focused on WikiLeaks, this study deliberately set out to fill the gap left by studies such as Brevini's (2017). Instead, we focused on the underresearched area of alternative and regional platforms as we consider it to be relevant in order to obtain a much clearer and complete picture of the whistleblowing platform ecosystem. Moreover, the platforms included in this sample also come from countries with different national legislations in regards to whistleblowing protection. The EU has passed a new comprehensive binding directive in 2019 and member states have until December 2021 to transpose the standards of the Directive into domestic law. Currently, Germany doesn't have a general law about whistleblowing and some protections are only granted by other, non dedicated laws; Hungary has approved a specific law in 2013, granting protection to whistleblowers both in the public and private sectors; Italy passed similar legislation in 2017, while the Netherlands approved their Whistleblowers Authority Act in 2016 (Transparency International Netherlands, 2019). With the exclusion of Germany, whose safeguards for whistleblower have been judged as "weak", all other countries offer either a "medium" level of protection (Hungary) or strong (Italy and the Netherlands), according to a Transparency International Netherlands overview of EU countries national legislations (2019).

We have adopted a two-step methodological design. Initially, we carried out a document analysis (Prior 2003) in order to get a better picture of the platforms' rationales. In this analysis we focused on publicly accessible materials such as mission statements, code of ethics, guidelines, statutes, FAQs, and general descriptions present on all whistleblowing platforms in the sample. We concentrated in particular on texts that stated how the platform and its owners deal with questions or feedback from the audience, how they ensure privacy and anonymity, what is done with the leaked documents, and who gets access to them, particularly if the platforms collaborate with news outlets. Having this in mind, we applied a thematic analysis to the texts, where we carefully looked for emerging patterns in the data that were then combined into the following categories (Fereday and Muir-Cochrane 2006): platform rationale, main activities, ownership and staffing, IT and security, ethics, collaborations, verification, interaction and feedback. This first step allowed us to understand whether and to what extent whistleblowing platforms implement strategies to foster transparency and responsiveness. This procedure has already been applied and verified in other circumstances, for instance with regard to the investigation of professional journalistic norms (Splendore et al. 2016).

In a second step we carried out problem-centered interviews (Witzel 2000) with one representative from each whistleblowing platform. The goal of the interviews was to retrace

the developments as well as the awareness of the different actors with regard to the areas included in the model explained above. Carrying out interviews in addition to the document analysis allowed us to triangulate the different methods and to get a more thorough picture of how whistleblowing platforms deal with questions related to transparency and responsiveness. The semi-structured interviews followed a guideline that left room to discuss further aspects that were raised during the interviews. Three interviews were carried out via Skype (Hanna 2012). The fourth interview, upon the specific request of the interviewee, could only be made via online chatting. The three interviews via Skype were recorded for a more thorough analysis and subsequently evaluated with the help of a qualitative content analysis following a grounded theory approach (Glaser and Strauss 1967) to identify overarching concepts and similarities between the interviewees' responses. Due to the sensitive nature of the topic all interviewees were granted anonymity.

Findings

First of all, it is important to address the issue of the platforms' identities: none of the involved organizations conceptualize the platforms as publishing entities, rather as instruments or tools. In fact, none of the platforms publishes original content or uses its own website as publishing space: articles based on material received through the platforms are published by the hosting organization elsewhere (MagyarLeaks, with *Atlatszo*; *Die Zeit's* Briefkasten) or by media partners (PubLeaks; IrpiLeaks). In all cases, platforms are integrated in the organizations' workflow together with other tools. This instrumental attitude is mostly visible in PubLeaks, whose purpose is to connect whistleblowers with interested media partners by acting as a technical bridge only.

Not all the platforms include the information on their own websites. *Briefkasten*, for instance, offers a brief description of their activities on its own webpage, while a more thorough article can be found on *Die Zeit's Data Blog*.^{iv} In addition, not all of the platforms are equally exhaustive when it comes to their activities. While *PubLeaks* limits the description to mostly administrative and legal notes, *Átlátszó's* publishes annual reports, where they describe how many submissions the whistleblowing platform received in the last year. Besides the description of their activities, most texts focus on the importance of anonymity, giving very detailed instructions on how to anonymously upload leaked documents and information on how not to make mistakes with the software and avoid human errors.

Actor Transparency - Before Publication

When it comes to "actor transparency", all whistleblowing platforms performed well by disclosing information regarding staffing, aims, and how the encrypted submission systems works. There is however a small differences concerning funding, which allows already at this stage to detect some divergences between whistleblowing platforms that operate independently or as part of a NGO, and the case of a platform integrated into an established news organization: While IrpiLeaks^v, PubLeaks^{vi} and MagyarLeaks^{vii} all provide complete information in English concerning the funding of the project, *Die Zeit's Briefkasten* does not. Although detailed information concerning journalists involved in the initiative and how to get in contact to them, phone numbers included, are provided (in German only), no specific data concerning funding is shown.^{viii} As Briefkasten is considered a tool for *Die Zeit's* journalists, it is consequently funded through the newspaper company. The platform's website still features detailed security information and explains the ethos and the aims of it, but the missing data about the funding demonstrates that the logics of traditionally publishers in terms of transparency still prevail, even if the activity is seen as part of a wider and networked field of journalism.^{ix}

In this regard, MagyarLeaks provides most information in relation to actor transparency: this might also be due to the fact that the whistleblowing platform is seen as a

tool for the parent-group, Atlatzso. It emerged from the interview, that it is impossible to separate information from the organization from details concerning the platform. Also in this case, particular attention is given to the technical information on the functioning of the submission system.^x Overall, when it comes to actor transparency, staffing and rules for keeping sources anonymous and protected are those areas where most information is provided. The increased sensitivity to transparency might also be due to the fact that a Hungarian website needs to account for the owners of the site given the many challenges that the Hungarian media system is currently facing.

Production Transparency - During the Process of Publication

For the purposes of our analysis, we focused on three elements of “production transparency”: the presence of an explicit ethics code, the way media partners are presented and managed by organizations running the platforms, and hints in relation to the verification process of the leaked information. With regard to ethics codes, the situation is the exact opposite compared to funding transparency. Among the four analyzed platforms, only *Die Zeit*’s Briefkasten has a formal ethics code. Interestingly, it is the same code of ethics that is used for any other editorial production of the German weekly, applying therefore the same journalistic standards to the activities of the whistleblowing platform. From this perspective, *Die Zeit* makes no differences between those who work for whistleblowing platforms and traditional journalists. This means that dealing with leaks becomes, at least in the understanding of the German newspaper, an integrated activity of the journalistic field with the same responsibilities. IrpiLeaks, instead, developed its own “editorial guidelines” that concentrate on how its journalists will handle the leaked information in particular.^{xii} Compared to their German counterparts, IrpiLeaks’s more individualist approach to ethics is characterized by the fact that IrpiLeaks is not embedded within a large and established news organization, and had therefore to develop their own understanding of ethical rules from scratch.

When it comes to collaborations, media partnerships are created by IrpiLeaks and PubLeaks only, while Briefkasten and MagyarLeaks are used by their hosting organization. In the case of the Italian and the Dutch platforms, partnerships are chosen based on the specific characteristics of every story grounded on leaks, by successful previous working relationships or, in the case of PubLeaks, following the specific requests of the whistleblower, as it is envisioned in the “multistakeholder” approach. These partnerships, for IrpiLeaks, are usually not continuous, but implemented on a case-by-case basis. This means that the journalists pitch the stories to ideal or interested outlets, even if, most of the time, a personal relationship existed beforehand:

“If a partnership with a news outlet takes place it is because we know the people who work there and because we know they follow our ethics. [...] Partnerships are not systematical, there’s no explicit deal. We just contact them when we have something we consider interesting for them” [IrpiLeaks, interview with the authors].

This personal approach is also due to the fact that established news media in Italy were not experienced - or even skeptical - in handling documents obtained through whistleblowing. This entailed that relations had to be established with actors either experienced with whistleblowing, or who at least accepted to publish information obtained through such means.

PubLeaks’ “multistakeholder” approach is entirely based on more structured partnerships with news outlets that also contribute to the funding of the project. The strategy aimed at involving as many news outlets as possible, without recurring to any form of selection criteria, in order to broaden the spectrum of potential leaks recipients to the maximum:

“No criteria were developed. The initial idea was to gather as many media as possible. [...] All the members are required to pay a fee to finance operations and that’s it.” [PubLeaks, interview with the authors]

When it comes to verification processes, the whistleblowing platforms are reluctant to present any detailed information on the websites. The reason for the secrecy is related to safety reasons put in place to protect the anonymity of the sources. Many people can be involved, as the manager of *Die Zeit*’s Briefkasten told us, referring to the newspaper’s investigative unit, that runs the platform:

“Everyone gets the encrypted emails from the Briefkasten, so we speak with one another.” [Die Zeit’s Briefkasten, interview with the authors]

In order to reduce the risk of any security breaches, the publicly available information on how leaks are handled and verified is limited. However, the interviews demonstrated that the process of verification of the leaked data resembles to a large extent journalistic production processes. This is however not limited to whistleblowing platforms that are part of a news outlet such as *Die Zeit*. Also MagyarLeaks and IrpiLeaks described the verification processes as being grounded in journalistic principles and standards. The manager of IrpiLeaks for instance declared:

“Our actions are very similar, if not the same, to our journalistic principles. Questions we ask ourselves once a leak is received are: is this or public interest? Why does the leaker want to share this? Is the information solid? [...] The evaluation process is not different to the one typical of a journalist dealing with a source.” [IrpiLeaks, interview with authors].

However, there are differences between the platforms, which are mainly due to their rationale. While MagyarLeaks, IrpiLeaks and the Briefkasten all apply journalistic standards when it comes to verification and publication processes, PubLeaks denies any responsibility with regard to the question whether the leaks are of public interest or whether they ought to verify the received material. They leave this duty entirely up to the partnering news media. This behavior is based on the rationale that their platform is not involved in publishing content at any level, but is only meant to serve as a platform that offers media outlets a way to obtain content from whistleblowers. In this sense, PubLeaks’ staff is not involved in any way in the verification of leaks, only the journalists working with the media partners are.

The issue of verification is only one aspect of a wider range of issue when it comes to the responsibilities of whistleblowing platforms. In the end it all comes down to the way how disclosures are intended by whistleblowers themselves, whistleblowing platforms, and also by news organizations. As Briant and Wanless (2018) have shown in relation to the 2016 US presidential election and the ‘Panama Papers’, different key actors manage and exploit leaks in different ways, trying to shape the public perception of the concerned actors. These “strategic leaks” do have particular political objectives:

“motives might include ‘whistleblowing’ or myriad other, possibly nefarious or self-interested motivations. Often media and political rhetoric reduce leaks to simplistic dichotomies, hindering understanding of competing interests and ethics involved. Leaks can be described as strategic, where they are a deliberate act by a powerful or asymmetric actor motivated towards achieving a specific political or security objective.”

When it comes to the general assessment of the performance of whistleblowing platforms, we need therefore to look beyond the specific activities of the platforms, since “a networked hierarchy of actors struggle over dissemination, manipulation and framing of the leak” (Briant

and Wanless 2018, 63). Given that different actors might have different motivations to publish or leak sensitive information, it is therefore paramount for whistleblowing platforms, particularly since they enable the access to and spread of leaked information, to be transparent and to be held to account for their actions in order to make it clear what kind of motivations they are pursuing.

Responsiveness

We intend responsiveness as an integral and relevant element for whistleblowing platforms in terms of their engagement and interaction with readers, that is their comments or feedback to criticism and the way they communicate through social media platforms. The estimation of the responsiveness of the platforms and the way these tools are operated is strongly related to the platforms' self-perception and the function they attribute to their own platform.

Since the surveyed platforms are not standalone publishing entities, they usually do not have social media accounts under their names. Instead, they rely on their hosting organizations' profiles. The only exception to the rule is the platform PubLeaks that does have a social media account on Twitter. However, also in this case, the Twitter account is not used to answer users' questions or criticisms. They only promote articles published on websites of their media partners.

In addition, the news articles that result from the material obtained through the whistleblowing platforms are not published on the platforms' websites, but elsewhere. This means that the discussions with and between the users on the specific subject occur on the news organization's website, but not on the one of the whistleblower. Nevertheless, all actors (even if most of them through their parent organizations) integrate social media in their work. Nonetheless, our investigation proves that the platforms have different aims when it comes to the use of practices of responsiveness such as social media or readers' comments. Table 1 summarizes our results:

Table 1: How responsiveness is implemented on the different platforms

Platform / Category	Social media and function	Readers' comments	Specifics
IrpiLeaks	Facebook, Twitter, LinkedIn: Spreading articles, call for donations	On the IRPI site	No platform owned accounts; "no interactive platform"
MagyarLeaks	Tumblr, WhatsApp, SoundCloud, Twitter, Facebook: "To build a community"	On social media: the goal is monitoring in order "To know our readers"	Social media to ask readers to contribute to investigations
PubLeaks	Twitter: Promoting articles	Not applicable: they consider themselves "Not a publishing site"	Emphasis on the whistleblowing platform as "tool"
Die Zeit - Briefkasten	<i>Die Zeit's</i> channels: "No marketing", "Journalism is communication"	"Integral element of our work as journalists", particularly on Twitter	No stand-alone accounts. Journalists' accounts and phone numbers available

Again, when it comes to the implementation of responsiveness, the main difference between the platforms can be related to their rationale. The interviews confirmed that those platforms, that see themselves primarily as a tool, such as IrpiLeaks and PubLeaks, do not see any value in implementing any accountability practices related to responsiveness:

“The peculiar added value of PubLeaks is not being a publishing house. So it doesn’t have readers in a traditional terms, but the partner media have.” [PubLeaks, interview with the authors]

Their use of social media accounts is limited to the promotion of stories published thanks to a leak obtained through their platforms. The same happens with *Die Zeit’s* Briefkasten, although the function is clearly separated from other marketing activities. Only MagyarLeaks uses social media in a way that it tries to include forms of participatory journalism during their investigations:

“We are very focused on community building so it’s not just marketing [...] We are trying to empower people with social media, for instance by asking them to file FOIA requests on different topics. [...] We are also trying to involve them in the process, drawing attention on the fact that we need tips or information. Moreover, when we have big amounts of documents we ask our audience to look at the docs and to give us tips about what to cover” [MagyarLeaks, interview with the authors]

Overall, almost all whistleblowing platforms define accountability through reliability in terms of security and privacy. For MagyarLeaks and PubLeaks, the overall reliability is assured by the security of the platforms or by the GlobaLeaks software features:

“MagyarLeaks is confidential and even we don’t know who the informant is and we don’t have any opportunity to know where the documents come from. This is the main advantage for leakers who fear coming out and exposing themselves.” [MagyarLeaks, interview with the authors]

“In terms of accountability of the project, I think the most important thing is security, starting from not jeopardizing the leakers’ identities, unless they decide to do so.” [PubLeaks, interview from the authors].

For *Die Zeit’s* Briefkasten, technical safety is also the strongest element of reliability of the platform. However, in the case of the German platform, the free and open source nature of their leaking software plays a relevant part: According to them, the fact that the software is open source – and thus transparent – is an additional factor that determines the accountability of the project:

“Open source code, as everyone can look into the system. And some did: we recently got a message, via Briefkasten, that our SSL certificate was not up to date anymore. [...] We want our system to be as good as possible, to secure our readers and our informant” [Die Zeit’s Briefkasten, interview with the authors].

Only IrpiLeaks reliability of the project is confirmed by Irpi’s journalistic production and their ethical standards:

“Our work done prior to the creation of the platform as well as in the past years does speak for our accountability. We do not claim to be perfect journalists or the best ones, we are humans and we are also bound to make mistakes” [IrpiLeaks, interview with the authors]

IrpiLeaks's strong identification with journalistic ethical standards reinforces the notion that the professionalism of whistleblowing platforms is dependent on the closeness of the actors to the journalistic field. The results in relation to transparency, but in particular also to responsiveness, show that there are two different categories of whistleblowing platforms: those (IrpiLeaks and PubLeaks) that see themselves neither as publishing sites nor as webpages with a specific task to host interactions with relevant stakeholders. And those (MagyarLeaks and Die Zeit) that clearly set themselves within the publishing industry and try to build a community or see it as an integral part of their job description. These differences in the rationale of the platforms do have consequences for their openness and transparency and the way in which they interact (or not) with their publics.

Discussion and Conclusion

WikiLeaks has been confronted with the issue of accountability since the beginning of the organization's activities, and even more since it became known to a wider public after releasing documents in relation to cases such as e.g. the Guantanamo Bay Procedures. WikiLeaks, because of the limited information it was sharing about itself with the public, has also been accused of pursuing transparency for anyone, except for itself. In the past couple of years, research has taken up on the issue by pointing at the "bundled/obscure public symbiotic relationship between Assange and WikiLeaks" (Uricchio 2014) as a potential obstacle to accountability or by noticing a

"discernible shift in journalistic assessments of WikiLeaks as its notoriety and influence grew – away from a simple view of the organization as a largely benign force enlisted in journalism's never-ending battle for free speech, and toward a concern about its lack of accountability." (Wahl-Jorgensen 2014, 2584)

WikiLeaks' harsh reactions to any form of criticism pushed the issue regarding accountability to the point where many asked whether it was still possible to rely on WikiLeaks and its battle for transparency (Gibney 2016). The way WikiLeaks reacted to criticism seemed to show how

"WikiLeaks refuses any responsibility except for the veracity of the documents and the security of the sources. Its principle is transparency – not for its own organisation, a fact which is criticised heavily – without regard for the consequences." (Thomass 2011, 22)

The criticism around WikiLeaks' behavior led us to study how other whistleblowing initiatives behave when it comes to their transparency and accountability in order to see whether these issues are structural or related to single cases or platforms. Given that leaked documents may be of public interest, it is crucial to know how the data is handled and who is responsible for its dissemination and publication.

The results demonstrate that the analyzed organizations, to some extent, do express interest in transparency and accountability, especially when it comes to *actor transparency*. All analyzed platforms consider transparency, understood as granting access to context information about the platforms, as a central asset for building trust and reliability. This becomes even more clear in the case of platforms integrated with news media: where information is internally processed without having to rely on outside actors, as it is the case of *Die Zeit*, whistleblowing platforms are seen as being part of the "watchdog" role of journalism (Wahl-Jorgensen and Hunt 2012). Therefore, the quality of their performance is strongly tied to journalism's reliability and trustworthiness - and therefore to journalism's responsibility. This is mirrored by the fact that *Die Zeit*'s internal code of ethics applies to the *Briefkasten*, showing that whistleblowing is part of their editorial offer.

While all the analyzed whistleblowing platforms largely comply with the standards of *actor transparency*, the situation is more complex when it comes to *production transparency*. Given the sensitive nature of the material whistleblowing platforms are dealing with, they are reluctant revealing details about selection or verification processes. There are however differences in terms of their responsibility to verify the leaked materials. But this strongly depends on the platform's rationale as to whether they understand themselves as a part of the journalistic field. The analyzed platforms are situated at opposing ends of a spectrum, with PubLeaks/IrpiLeaks and Briefkasten/MagyarLeaks determining the two poles. While the former are clearly positioned within the field and the boundaries of journalism, the latter consider themselves as technological tools and intermediaries only, rejecting any form of (editorial) responsibility.

There are differences also with regard to responsiveness, albeit all platforms do not perform well in terms of taking the public's concerns into account: IrpiLeaks and PubLeaks point out that they are not publishing entities and not interested in any form of interaction with their publics. The interviewees' argumentation followed a technologically driven rationale, where the platforms only serve as a *tool* for whistleblowers. This position is best reflected by PubLeaks's primary focus on whistleblowers' security and identity protection. They see themselves as dropbox, where people can submit sensitive documents and choose which news media get access to the material. Even if IrpiLeaks offers the possibility to post comments, their main news page offers no specific information about the activities of the whistleblowing platform and no possibility to interact. The more instrumental and technologically oriented the platforms are in terms of their self-defined role, the more likely they place themselves at the periphery or even outside the boundaries of the journalistic field. This means that journalism ethics are neither enforced nor implemented, and that relevant stakeholders other than sources or partnering news media are not being taken into account. On the other hand, the closer relation to journalistic norms and values, the more importance is given to the public as both a community as well as a primary stakeholder. The use of social media in order to get in touch with their users – or “to know their readers” as the manager of MagyarLeaks stated – is a central task. The journalists working at *Die Zeit*'s Briefkasten confirm this view by pointing out that it is an integral part of their job *as journalists*.

Then again, the journalistically oriented platforms differ in terms of their approach to responsiveness: considering Brant's and de Haan's (2010) models of responsiveness, *Die Zeit*'s Briefkasten acts according to what the two authors define as civic responsiveness, addressing the public as citizens while being open to discussion. MagyarLeaks, on the other hand, applies a more emphatic form of responsiveness: they see the public as part of their battle against injustice and surveillance. They sustain a discourse of citizen empowerment, against those in power, by implementing different forms of crowdsourcing, where the audience is involved as sources or data analysts. This kind of platform understands itself as a proactive player in society, transcending traditional role distinctions between information and activism in an hybrid media environment characterized by “subtle but important shifts in the balance of power” (Chadwick 2013, 6). This means that this type of platform actually reaches out for the public's support in order to level up its performance.

Whistleblowing platforms are institutions with the function of making societies more transparent by (facilitating the) uncovering wrongdoings. Even if the platforms' main task is to contribute to “a new digital culture of disclosure” (Brevini 2017, 1), this does not prevent the platforms from being potentially held to account for their own activities and to improve their own culture of disclosure. However, the decisive variable in this equation is whether the platforms consider themselves as part of the journalism field. The more journalism oriented the platforms are, the more responsive, and the more empathic and participative their activities become. Arguing that whistleblowing platforms are just technological tools is therefore one-

dimensional, because they do have an impact in society, not least through their collaboration with news organizations.

Not taking into account the public's concerns means ignoring one of their primary stakeholders. It also means that explaining the importance of whistleblowing platforms to the wider audience and strengthening the trust in these institutions become complex issues. Whistleblowing platforms need to champion their own accountability as a means for reputation management - in order to avoid WikiLeaks's errors.

This also raises the question whether whistleblowing platforms have actually developed, at least to some extent, a certain professionalism. Particularly in the light of the recent criticisms surrounding the actions of WikiLeaks, it is of relevance whether other platforms have started to implement measures in order to make their platforms not only accountable, but also more transparent. Grounded on what the interviewees said, we cannot definitely confirm that WikiLeaks's actions have contributed to the development of a professionalism, but what is certain is that those actors that see themselves more closely related to the field of journalism, do act in a more responsible way. But this is more an expression of their journalistic professionalism rather than a professionalism that characterizes whistleblowing platforms themselves. In other words, if those individuals running the platforms understand themselves as journalists, their journalistic professionalism will affect the platforms' accountability and responsiveness.

However, the professionalism is also influenced by another variable that goes beyond the closeness of the platforms - or of the individuals running the platforms - to the journalistic field. This element concerns a core element of whistleblowing platforms: the ability to secure the anonymity and security of the whistleblowers. Professionalism, in this sense, is also determined by the way whistleblowing platforms manage the way the disclosures impact the whistleblowers' lives. Some organizations consider these responsibilities beyond the immediate information transfer as equally important. For instance, the "Signals Network"^{xii} is one organization that supports whistleblowers with counselling and legal services. Other organizations such as the Dutch "House of Whistleblowers" offers advice and psychosocial support to whistleblowers.^{xiii} These activities are extremely relevant, given that whistleblowers suffer from extreme pressure, which is also demonstrated by mental health problems that are much more prevalent than among the general population (van der Velden et al. 2018, 632). In addition, such additional services that go beyond the idea of source protection can become extremely useful, particularly if the disclosed information concerns illegal governmental activities, as could be seen in the cases of Chelsea Manning and Edward Snowden. These services also cater for the different situations whistleblowers find themselves in, which, depending on the whistleblowers' background, can throw up very different needs. Whistleblowers may be embedded in different circumstances, which shape the whole process from the disclosure to the publication of the leaked information in news outlets. Taking the different needs of whistleblowers into account, and catering not only for their protection, but also for their well-being, might eventually contribute to a stronger professionalism among whistleblowing platforms.

This study presents some shortcomings. The conclusions are based on four case studies, which make the generalizability of the conclusions limited. Second, there is a limited number of interviews. However, by using a mixed methods approach integrating a document analysis with semi-structured interviews, we tried to counterbalance these limits. Further research should focus on a longitudinal study on whether and how whistleblowing platforms changed their behavior in terms of accountability and responsiveness over time. Additionally, future research should also analyze the norms and values collaborators of whistleblowing platforms are abiding to, in order to understand their role-perception and to compare them with those of journalists. The relationship between hackers and journalists is one of the most interesting

grounds where the boundaries of journalism (Carlson and Lewis 2015) are contested when it comes to the fields of whistleblowing and hacking (Di Salvo 2017). Thus, a deeper analysis of how journalism and hacking are intertwined in a process of hybridization would also contribute to the understanding of the evolving journalistic field.

Notes

ⁱ Available here: <https://wikileaks.org/akp-emails/>. Originally, WikiLeaks had presented on Twitter the release of more than 300,000 hacked emails as they were coming from the highest positions of Erdogan's party or even from Erdogan himself. According to some Turkish observers, the emails actually didn't include any newsworthy piece of information and were not sent by the inner circle of Erdogan (Tufecki 2016). AKP party servers were allegedly hacked by hacker Phineas Fisher and it is still unclear how the cache of documents reached WikiLeaks (Cox 2016).

ⁱⁱ The leaks were however published on archive.org by activist Michael Best after they were leaked over the Internet. WikiLeaks never published these specific database, it only tweeted links to access it. archive.org later removed the material, as it was violating people's privacy (Cox 2016).

^{iv} See <http://blog.zeit.de/open-data/2012/07/30/daten/>

^v Here: <https://irpi.eu/chi-siamo/>

^{vi} PubLeaks website went through a complete redesign a few months after the analysis took place. Although no substantial change of content was applied, it is incoherent to link to specific pages as the analysis was based on a different website.

^{vii} The information is available in English here: <https://english.atlatszo.hu/about-us-fundraising/>

^{viii} Available here: <http://www.zeit.de/briefkasten/index.html>

^{ix} Available here: <http://blog.zeit.de/open-data/2012/07/30/daten/>

^x Available here: <https://atlatszo.hu/magyarleaks/>

^{xi} Available here: <https://irpi.eu/en/irpileaks/data-management-editorial-policies/>

^{xii} More information available at: <https://thesignalsnetwork.org/mission>

^{xiii} More information available at <https://www.huisvoorklokkenluiders.nl/english>

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