

Protected Disclosures

Policy and Procedures for disclosures to TII where a worker is not a current or former TII employee or Board Member

Code of Practice Appendix E(ii)

January 2023

IMPORTANT: This document does not purport to be an interpretation of the law or to offer legal guidance or advice. Any person considering making a protected disclosure should first consult the provisions of the Protected Disclosures Act 2014, as amended, and seek legal advice if necessary.

Guidance on the Protected Disclosures Act from the Department of Public Expenditure Reform can be found at <https://www.per.gov.ie/en/protected-disclosures-act-2014-and-guidance/> and also at <https://raiseaconcern.com/legislation/protected-disclosures-act-2014-guidance>

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1. Protected Disclosures Act 2014

The purpose of the Protected Disclosures Act, 2014, is to provide a framework within which workers can raise concerns regarding potential wrongdoing that has come to their attention in a work-related context. The Act provides protection from penalisation if it results from the making of a protected disclosure.

2. TII Policy

The Board and Management of TII are committed to the highest standards of openness, probity and accountability. A workplace culture of encouraging disclosures of wrongdoing is supported to enable staff and other individuals associated with TII to voice concerns in a responsible and effective manner. Should an individual discover information which they believe shows malpractice or wrongdoing then this information should be able to be disclosed without fear of reprisal. If a worker has a concern relating to suspected wrongdoing affecting any of TII's activities, they should report it under this Policy in line with the Procedures set out.

3. Principles

The following key principles form the basis of this Policy and Procedures:

- All reports of wrongdoing in the workplace should, as a matter of routine, be the subject of an initial assessment and any appropriate follow-up action.
- The focus of the process should primarily be on the wrongdoing reported and not on the reporting person.
- The identity of the reporting person and any person concerned should be adequately protected; and
- Provided that the reporting person discloses information relating to a relevant wrongdoing, in an appropriate manner, and based on a reasonable belief, no question of penalisation should arise.

4. Oversight

The TII Head of Governance & Legal has responsibility for the day-to-day management and co-ordination of procedures under the Protected Disclosures Act 2014 (as amended) and for production of prescribed reports. The Head of Governance and Legal will report on activity under this policy and procedure to the CEO who is a prescribed person under Section 7 of the Act. General oversight of policy and procedures is the responsibility of the Board. This policy and procedures will be reviewed at least every three years.

5. What is a Protected Disclosure?

A protected disclosure is a **disclosure of information** which, in the **reasonable belief** of a **worker**, tends to show one or more **relevant wrongdoings**; came to the attention of the worker in a **work-related context**; and is disclosed in the manner prescribed in the Act.

6. Who is a worker under the Act?

The Protected Disclosures Act 2014 (as amended by the Protected Disclosures (Amendment) Act 2022), “the Act”, sets out the definition of worker to include current and former employees, consultants, contractors, paid or unpaid trainees, work experience students, shareholders, volunteers, interns, part-time, full-time, casual workers, agency workers, persons engaged in recruitment or pre-contractual processes and Board members. This policy covers workers who are not TII current or former staff or Board Members. Separate procedures are in place for staff and Board Members.

7. TII as a Responsible Person (Section 6 of the Act)

Disclosures can be made by a worker to TII, under Section 6 of the Act, where TII is defined as an employer with regard to that worker (as distinct from the worker being a TII employee) under Section 3. This section covers, for example, contractors, trainees and agency staff.

Disclosures can also be made to TII where a worker believes that TII is a responsible person within the context of Section 6 of the Act – this means that the worker believes that the relevant wrongdoing which the disclosure tends to show relates solely or mainly to the conduct of TII, or to something for which TII has legal responsibility.

To make a disclosure under Section 6 of the Act a worker must have a reasonable belief that the relevant information disclosed tends to show one or more relevant wrongdoings.

8. TII as a Prescribed Person (Section 7 of the Act)

By Statutory Instrument 367 of 2020 the Minister for Public Expenditure and Reform prescribed the CEO of the National Roads Authority, described for operational purposes as Transport Infrastructure Ireland, as the recipient of disclosures of relevant wrongdoings falling within the description of matters specified in the instrument as follows:

- (a) All matters relating to the planning and supervision of construction and maintenance of national roads, including preparing and arranging for the preparation of road designs, maintenance programmes, schemes for the provision of traffic signs on national roads, securing construction, improvement and maintenance works on national roads, allocating and paying grants for national roads and training, research or testing activities.

- (b) All matters relating to the procurement of the provision of the light rail and metro infrastructure in the State including the making of relevant bye-laws and the prosecution of related offences.

To make a disclosure under Section 7 of the Act a worker must reasonably believe that the relevant wrongdoing falls within the description of matters in respect of which the CEO of TII is prescribed (as set out in S.I. 367 of 2020) and that the information disclosed, and any allegation contained in it, are substantially true. A full list of prescribed persons, under Section 7, can be found at <https://www.gov.ie/prescribed-persons>

9. What is a relevant wrongdoing?

“Relevant wrongdoings” is defined in the Act as one or more of the following:

- an offence has been, is being or is likely to be committed;
- a person has failed, is failing or is likely to fail to comply with any legal obligation, other than one arising under the worker’s contract of employment or other contract whereby the worker undertakes to do or perform personally any work or services;
- a miscarriage of justice has occurred, is occurring or is likely to occur;
- the health or safety of any individual has been, is being or is likely to be endangered;
- the environment has been, is being or is likely to be damaged;
- that an unlawful or otherwise improper use of funds or resources of a public body, or of other public money, has occurred, is occurring or is likely to occur;
- an act or omission by or on behalf of a public body is oppressive, discriminatory or grossly negligent or constitutes gross mismanagement;
- a breach of specified EU law set out in EU Directive 2019/1937 on the protection of persons who report breaches of European Union law (the Directive) has occurred, is occurring or is likely to occur; or
- information tending to show any matter falling within any of the preceding paragraphs has been, is being or is likely to be concealed or destroyed.

It is immaterial whether a relevant wrongdoing occurred, occurs or would occur in Ireland or elsewhere and whether the law applying to it is that of Ireland or that of any other country or territory.

10. Exclusions from relevant wrongdoings

A matter is not a relevant wrongdoing if it is a matter concerning interpersonal grievances exclusively affecting the reporting person, such as grievances about interpersonal conflicts between

the reporting person and another worker. Such reports should be channelled to other procedures designed to address such matters.

A matter is not a relevant wrongdoing if it is the function of the worker or the worker's employer to detect, investigate or prosecute and does not consist of or involve an act or omission on the part of the employer.

11. What is information?

A protected disclosure should contain 'information' which tends to show wrongdoing. The ordinary meaning of disclosing information is conveying facts, such as stating that particular events have occurred. The Irish Supreme Court has held that to qualify as a protected disclosure a statement must contain such information which tends to show one or more relevant wrongdoings on the part of the employer and the disclosure must have sufficient factual content and specificity for this purpose, even if it does merely by necessary implication. This is different to simply making an allegation on the basis of a suspicion that is not founded on anything tangible.

12. What is a reasonable belief?

To ensure a disclosure is protected under the Act, a worker must have a "reasonable belief" that a wrongdoing has been committed, is being committed or is likely to be committed. The term "reasonable belief" does not mean that this belief is correct and where a worker discovers information in the course of their employment, which, in their reasonable belief, tends to show one or more 'relevant wrongdoings', it is important that they do not attempt to investigate the matter to verify these beliefs. They should, instead, report their concerns through the appropriate channels for assessment. A reporting person should not be penalised simply because they were mistaken, so long as they had reasonable grounds for believing that the information disclosed showed, or tended to show, wrongdoing. A reporting person's motivation in making a report is irrelevant when determining whether or not a report is a disclosure protected by the Act, provided a reasonable belief can be demonstrated.

It should be noted that the additional requirement of a reasonable belief in the substantial truth of the information disclosed, and any allegation made, is a further requirement for some disclosures under the Act, including to TII as a prescribed person.

13. What is a work-related context?

The information must come to the attention of the reporting person in a work-related context. A work-related context means current or past work activities through which the reporting person acquires information concerning a relevant wrongdoing, and within which the reporting person could suffer penalisation for reporting the information.

14. Confidentiality

The identity of persons making disclosures must be protected under the Act. TII will take all reasonable steps to treat disclosures made through this procedure in a confidential and sensitive manner. A worker's identity will be protected with the exception of a number of specific cases:

- the recipient shows that they took all reasonable steps to avoid disclosing any such information;
- the recipient reasonably believes that the person making the disclosure does not object;
- the recipient reasonably believes that disclosing any such information is necessary for the effective investigation of the wrongdoing concerned, prevention of serious risk to the security of the State, public health, public safety or the environment, or prevention of crime, or prosecution of a criminal offence;
- disclosure is otherwise necessary in the public interest or is required by law;
- disclosure is a necessary and proportionate obligation imposed by EU or State law in the context of investigations or judicial proceedings, including with a view to safeguarding the rights of defence of the person concerned.

Where it is decided that it is necessary to disclose information that may or will disclose the identity of the discloser, then the discloser will be informed of the decision in advance, except where the notification would jeopardise:

- the effective investigation of the wrongdoing;
- the prevention of serious risk to the security of the State, public health, public safety or the environment, or
- the prevention of crime or prosecution of a criminal offence.

TII will maintain all documentation related to disclosures in a secure digital environment to which only those staff tasked with management of protected disclosures have access. Any staff member involved in the investigation of protected disclosures will be under the same obligation to protect the identity of the discloser as the designated person.

In accordance with the Act, a failure to comply with the confidentiality requirement is actionable by the discloser if that person suffers any loss by reason of the failure of the recipient to comply.

Any person referred to in a protected disclosure, to whom a wrongdoing may be attributed, and any person connected with them, is also entitled to have their identity protected during the course of any assessment or investigation of the wrongdoing alleged.

15. Anonymous disclosures

There is a distinction between an anonymous disclosure (where identity is withheld by the worker making the disclosure) and confidential disclosures (where the identity of the discloser is protected by the recipient). Anonymous disclosures are not excluded from the protection of the Act and TII is obliged by the Act to accept and follow-up on disclosures made to TII as a prescribed body under

Section 7 of the Act. While TII undertakes to act upon an anonymous disclosure to the extent that it is possible, it may be very difficult to investigate the wrongdoing it reveals where the discloser is unknown and cannot be contacted.

Where a worker who makes an anonymous disclosure is subsequently identified they are entitled to the full protection of the Acts.

TII encourages any worker who makes a disclosure to provide their name and contact details to better support the assessment and investigation process.

A reporting person cannot obtain redress under the Act without identifying themselves as part of the process of seeking redress.

16. Procedures for making a disclosure

It is important that a worker makes a protected disclosure in a manner prescribed by the Act to gain the protection afforded.

The **TII designated person for non-employee disclosures** is the Head of Governance & Legal. Reports to the designated person should be made to protecteddisclosures@tii.ie or **by telephone to +353 1 582 5984**.

The phone number provided is an automated line and the report can be made by leaving a message containing details of the alleged wrongful act or by requesting a call back by the designated person to whom the report can then be made. Where disclosures are made by way of anonymous message it may be difficult for the designated person to conduct an effective investigation and it is strongly recommended that disclosers provide contact details to allow effective investigation of the wrongdoing alleged. Where a recorded telephone message is made, a transcript of the report will be kept.

When making a disclosure, the worker should disclose the information that they have, based on a reasonable belief that it discloses a wrongdoing and, in the case of a report to TII as a prescribed person, on the basis of a reasonable belief that the information disclosed, and any allegation contained in it, are substantially true.

It is advisable that workers seek advice where they are unsure as to whether or not their report will qualify for protection under the Act. Details of support available are set out at Section 21 of this document. Workers can also seek advice from their own legal advisers.

Persons making a protected disclosure should frame it in terms of information that has come to their attention rather than seeking to draw conclusions about particular individuals or specific offences.

Once a protected disclosure has been made in accordance with the Act, it is not possible for a reporting person to withdraw the disclosure.

17. Assessment of disclosures

All disclosures, however made, are taken seriously by TII and all efforts are made to address appropriately the issues raised. As soon as a disclosure has been received the recipient will notify the CEO that a disclosure has been made and include the nature of the information contained in the disclosure.

As it is not possible to know at the time of disclosure whether a disclosure will subsequently be deemed protected under the Act, the recipient will keep a written record of his/her actions, including timelines, in dealing with the disclosure.

The designated person will be responsible for case management and for reporting on disclosures received.

(i) Acknowledgement of receipt of a Protected Disclosure

Where the report has been made orally to the automated phoneline, the designated person will produce a written summary (minute) of the report and shall, where contact details have been provided, confirm the information with the discloser to ensure that the report has been properly recorded. The discloser will be asked to provide an email or postal address to which written correspondence can be sent. Where this is not provided the designated person will not be able to comply with the requirements to provide written acknowledgement or feedback.

The designated person shall acknowledge receipt to the discloser in writing within seven days of the making of the disclosure unless the discloser has explicitly requested that they do not wish to receive any correspondence in relation to the disclosure made or, in the case of a report to TII as a prescribed person, where it is reasonably believed that an acknowledgement would jeopardise the protection of the identity of the reporting person.

The designated person will give a broad outline to the discloser of the manner in which it is intended to deal with the disclosure and associated timelines. They will also indicate a reasonable timeframe for feedback which cannot be more than three months from the date of acknowledgement of receipt of the disclosure (which time may be extended, in the case of reports to TII as a prescribed person, up to six months in total).

The acknowledgement will provide a link to this document, which contains details of the protected disclosures process, and will confirm that the identity of the discloser shall be maintained confidential, as set out in this document.

(ii) Initial Assessment

The designated person will carry out an initial assessment of the disclosure to determine whether it falls within the scope of this procedure and whether it is necessary to carry out an investigation into the disclosure.

The designated person will, as a minimum:

- record the disclosure and the steps taken to deal with it;
- clarify with the worker the basis of the concerns raised;
- establish what evidence is available to support the concern; and
- carry out all relevant enquiries promptly, sensitively and discretely, ensuring to protect the identity of the maker of the disclosure (if it is necessary to reveal the worker's identity to undertake an effective enquiry, consult with the relevant person in the first instance). The identity of any person referred to in the disclosure must also be protected.

The designated person will consider whether or not the report shows prima facie evidence of a relevant wrongdoing.

Where the report is made to TII as a prescribed body under Section 7 the designated person will consider whether or not the report concerns a matter in the scope of the responsibility of the prescribed person. Where it is determined that the report is not within the scope of the prescribed person, the report will be immediately transmitted to the relevant prescribed person, or where there is no prescribed person, to the Protected Disclosures Commissioner.

At the conclusion of the initial assessment the designated person shall decide whether or not an investigation is to be carried out and shall communicate this outcome, with reasons, to the discloser.

In certain circumstances, where the disclosure is of a serious nature, it may be necessary to refer the matter for external investigation e.g., to An Garda Síochána or other investigative or statutory body.

If a discloser is not satisfied with a decision not to proceed to an investigation, he/she may seek a review of the decision as set out in section titled Review of assessments and investigations at 18.

(iii) Full Investigation Stage

Where an investigation is required, a full investigation will be immediately initiated. The main purpose of the investigation is to assess whether the disclosure is based on a reasonable belief and grounded, based on a reasonable belief but ungrounded or is a deliberately false report.

Where the nature of the disclosure is such that another person in TII with the necessary knowledge, experience or technical skill in relation to the subject matter of the disclosure should be consulted in order to properly assess or investigate the disclosure, the designated person may consult with such person or persons and may delegate some or all of the investigative process to them if necessary. The designated person shall not disclose the identity of the discloser to such person or persons save as is necessary and permitted under this policy and procedure. The designated person shall remain responsible for the co-ordination of the assessment/investigation and the provision of acknowledgement, feedback and reports.

The steps to undertake a full investigation should as a minimum include:

- record the disclosure and the steps taken to deal with it;

- clarify the basis of the concerns raised with the worker;
- establish what evidence is available to support the concern;
- carry out all relevant enquiries promptly, sensitively and discretely, ensuring to protect the identity of the maker of the disclosure (if it is necessary to reveal the worker's identity to undertake an effective enquiry, consult with the relevant person in the first instance) and any person referred to in the disclosure;
- gauge the risk associated with the issue and take immediate action if the alleged wrongdoing involves a serious loss or danger to others;
- any investigation arising should, as with all other investigations, be carried out in a manner which is fully consistent with existing investigation procedures and embody the principles of natural justice;
- obtain evidence from any relevant witnesses;
- assess whether the disclosure report is based on a reasonable belief but ungrounded, based on reasonable belief and grounded or a deliberately false report;
- take appropriate action if the disclosure is grounded;
- if the disclosure is deliberately false, consider what action to take; and
- provide written feedback to the worker as set out below, including any proposed action.

Depending on the nature of the disclosure, the designated person may consider referring the matter to another senior official for investigation if they consider that that is more appropriate. Any such referral can only be done with the approval of the CEO.

The initiation of an investigation must be reported to the CEO by the investigator. The investigator must also advise the CEO of the outcome and any recommendations arising out of any investigation.

Where a report of a disclosure concerns a breach of EU law, as provided for in the Act, the designated person must send the information to the relevant EU bodies as soon as practicable, where this is provided for under EU or Irish law.

(iv) **Conclusion of investigation and Feedback**

It is not possible to lay down precise timescales or steps required for investigations, as this will depend on the nature of the issues raised.

The discloser will be provided with feedback on the progress of the investigation and, where appropriate, any action taken or expected to be taken to address the wrongdoing reported within three months of the acknowledgement of the receipt of the disclosure. Further feedback can be provided at three-month intervals thereafter upon request. Where the report is made to TII as a prescribed body under Section 7 of the Act, the period for feedback may be extended to 6 months in total). Where a decision is made to extend the period, the designated person will contact the

discloser as soon as is reasonably practicable to inform them of the decision to extend the time for feedback.

When providing feedback, the overriding requirement is that no information will be communicated that could prejudice the outcome of the investigation or any action that may ensue for example, by undermining the right to fair procedures enjoyed by any person against whom an allegation is made.

Any feedback given to a discloser is provided in confidence and should not be disclosed further, other than to the discloser's legal advisor or trade union representative (where applicable) or unless the information forms part of a further protected disclosure being made via another channel.

Details of the final outcome provided to the discloser will be subject to legal restrictions concerning confidentiality, legal privilege, privacy, data protection and any other legal obligation. Disclosers will not be provided with details of the commencement, progress or outcome of any disciplinary process involving another worker which may arise on foot of an investigation occasioned by a protected disclosure.

In the case or reports to TII as a prescribed body or responsible person, disclosures may relate to other organisations or individuals who are not TII employees. In these cases, TII may be limited in its ability to investigate such reports and will have regard to TII's statutory powers and/or contractual rights in determining the possible scope and/or terms of reference of such investigation. If a discloser is not satisfied with the outcome of an investigation, they may seek a review.

(v) General principles for investigations

Fair Procedures and Natural Justice

Any investigation arising as a consequence of a disclosure will be carried out in a manner which has full regard to the principles of natural justice and fair procedures, including the protection of the rights of individuals against whom allegations of wrongdoing are made (the 'Respondent'). In many cases, the Respondent's right to fair procedures may include a right to challenge the evidence against them. This right will need to be balanced against rights contained in the Act, such as the discloser's right to have their identity protected.

Whether it is necessary to disclose the identity of the discloser, or not, will depend upon the facts of the case, which may include, for example, whether any allegation is made against an individual and the nature of that allegation. The designated person will need to consider such matters when determining whether a protected disclosure can be investigated and the nature of any investigation.

Terms of Reference

While terms of reference may not be necessary for all investigations, in the case of more complex or serious investigations the designated person may decide to draw up terms of reference. Terms of

reference should be sufficiently broad to allow the investigator to take further actions or examine further issues that may arise in the course of the investigation and should not be unduly restrictive. Terms of reference will have regard to TII's statutory powers and contractual rights and will provide for the review of documents and interview of witnesses as appropriate. Terms of reference will be reviewed and approved by the CEO.

Right to review

Where an investigation under this policy and procedure has made an adverse finding against another worker (the Respondent), such that it gives rise to a disciplinary process or further investigations or processes against them, the Respondent shall have the right to seek a review of the outcome of the investigation.

18. Review of assessments and investigations

In the event that a party affected by the following processes is not satisfied with:

- any decision made to disclose the identity of the discloser (except in exceptional cases); and/or
- the conduct or outcome of follow-up actions (including assessment or investigation) undertaken on foot of the receipt of a report;

they may make a request for review of the process, decision and/or outcome. One review is available under the terms of this Procedure with the decision of that review deemed to be final.

The discloser should notify the designated person that they are not satisfied with the decision or outcome and that they are seeking a review. All requests for review under this policy must be made within one month of the notification of the decision or outcome to the affected party.

The designated person will commission a review of the matter by a person who has not been involved in the initial assessment, investigation or decision. This review may be carried out by a person from outside TII where appropriate.

The designated person will notify the discloser of the name and contact details of the reviewer. The discloser will, within two weeks of notification of the reviewer's details, outline in writing to the reviewer the reasons why they feel that the report requires further investigation or review.

The review will be carried out following the procedures outlined in this Guideline for the assessment and investigation of disclosures. On completion of the review, the reviewer will advise the discloser and the designated person as to whether a more detailed investigation is appropriate. A decision of the reviewer not to pursue the alleged wrongdoing will be a final decision.

The role of the reviewer will be to address the specific issues the applicant feels have received insufficient consideration and not to re-investigate the matter in question. The reviewer will consider:

- whether the correct procedures were followed;
- in the case of an investigation under terms of reference, whether the terms of reference were adhered to;

- whether the conclusions/findings could or could not reasonably be drawn from the information/evidence on the balance of probability.

19. Protection against penalisation

Any form of penalisation of workers who make protected disclosures is prohibited under the Act which makes the penalisation of reporting persons and connected persons a criminal offence.

Penalisation can mean any direct or indirect act or omission that affects a reporting person, which occurs in a work related context, is prompted by the making of the report and causes or may cause unjustified detriment to a worker and can include, for example, suspension, demotion or loss of opportunity for promotion, injury loss, threat of reprisal, failure to renew or early termination. This list is not exhaustive.

TII confirms that penalisation of workers who make such a report will not be tolerated.

20. Records and Reporting

Records of concerns raised, including the outcome, will be maintained for a minimum of five years after the closure of the case by the designated person. These records will be maintained in a confidential and secure environment.

TII is required under Section 22 of the Act to publish an annual report setting out the number of protected disclosures received in the preceding year and the action taken (if any). The Protected Disclosure confirmation will be included in the annual report and accounts of TII. This report is statistical in nature and does not result in any persons making disclosures being identifiable.

21. Data Protection and Freedom of Information

It is acknowledged that many protected disclosures will involve the processing of personal data within the meaning of the General Data Protection Regulations (e.g., the collection, registration, storage, disclosure and destruction of data related to an identified or identifiable person). Such information will be managed and processed in accordance with TII's Data Protection Policy and Procedures.

It should be noted that Section 16 B of the amended Act introduces new provisions whereby, in certain circumstances, and only where deemed necessary and appropriate, the rights of data subjects may be restricted to prevent the disclosure of information and identification of persons making disclosures. It may for example result in a data subject access request being denied.

The Protected Disclosures Act (Amendment) Act 2022 amends the Freedom of Information Act 2014. The Freedom of Information Act does not apply to any records relating to a protected disclosure made under the Protected Disclosures Act.

22. Support and Advice

Further information on the Protected Disclosures Act is available on the Department of Public Expenditure and Reform website at <https://www.gov.ie/en/publication/e20b61-protected-disclosures-act-guidance-for-public-bodies/>

Independent information is available on the Citizens Information website https://www.citizensinformation.ie/en/employment/enforcement_and_redress/protection_for_wistleblowers.html

Transparency International Ireland offers a free Speak Up helpline and advice centre, funded by the Exchequer, to support workers seeking to make disclosures under the Act and details can be found on their website <https://www.transparency.ie/helpline>

This document will be available on the TII website.

23. Guidance for making a disclosure

Disclosures should, ideally, be made in writing. When writing a report, a worker should demonstrate and support the reasons for their concerns and provide evidence of the concerns where such evidence is available. Any such reports should be factual (to the best of the worker's knowledge) and should address the following details, at a minimum:-

- that the disclosure is being made under either Section 6 or Section 7 of the Protected Disclosures Act and pursuant to these policy and procedures;
- the discloser's name, place of work and preferred contact details;
- what has occurred/is occurring/likely to occur;
- when it occurred - the date of the alleged wrongdoing (if known) or the date the alleged wrongdoing commenced or was identified;
- where it occurred;
- who was involved - the name of the person(s) allegedly involved (if any name is known and the worker considers that naming an individual is necessary to expose the wrongdoing disclosed);
- has it happened before;
- whether or not it is still ongoing;
- whether it has already been raised with anyone either within TII or externally? If so, to whom, when, and what action was taken;
- are there any other witnesses;
- is there any supporting information or documentation;
- how the matter came to light; and
- any other relevant information.

TII Governance & Legal Department

January 2023



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