



Iascach Iníre Éireann
Inland Fisheries Ireland

IFI Protected Disclosures Policy

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Protected Disclosures Policy

1.1 Introduction

The Board of Inland Fisheries Ireland (IFI) is strongly committed to fostering a culture which encourages and supports the organisation's workers to 'speak up' on any issue covered in the Protected Disclosures Act 2014 (as amended)¹. IFI benefits from such disclosures in that it may, for example, prevent the leaking of confidential information, reduce health and safety risks, limit potential financial and reputational damage and contribute to improved trust, confidence and morale of staff.

Those working in IFI will often be the first people to become aware of the signs of wrongdoing. They therefore play an essential role in early detection of behaviour that could damage IFI, its employees or the public it serves if permitted to continue. Nurturing a receptive culture and maintaining appropriate procedures is central to encouraging workers to make disclosures directly to IFI.

Under this policy a worker is entitled to raise concerns or disclose information without fear of penalisation or the threat of less favourable treatment, discrimination or disadvantage.

1.2 What is meant by making a protected disclosure?

A worker may make a protected disclosure when they disclose relevant information which, in the reasonable belief of the worker, tends to show one or more relevant wrongdoings (such as illegal practices or unethical conduct) which has come to their attention in a work-related context.

It is important to note that this policy does not replace any legal reporting or disclosure requirements required under other legislation. Where statutory reporting requirements and procedures exist, they must be complied with fully. Nor do these procedures seek to diminish, restrict or otherwise prevent a worker from seeking to exercise his or her rights under the 2014 Act.

The provisions of the Act will be applied to all protected disclosures and all disclosures will be assessed and, as the case may be, investigated in accordance with the provisions of the Act. Where appropriate, subject to the provisions of the Act, measures will be taken to protect the identity of the worker at all times.

¹ The [Protected Disclosures Act 2014](#) was amended by the [Protected Disclosures \(Amendment\) Act 2022](#) which transposes the EU Whistleblowing Directive into Irish law.

1.3 Policy Scope

This policy applies to workers in the context of Inland Fisheries Ireland.

1.4 Objectives & Principles

Objectives

- 1.4.1 To facilitate the disclosure of wrongdoing.
- 1.4.2 To encourage the reporting person to feel confident and secure in raising concerns and disclosing information in relation to wrongdoing in the workplace;
- 1.4.3 To provide the reporting person with avenues for the purposes of 'speaking up' in confidence and receiving feedback on any action taken;
- 1.4.4 This document sets out the process by which a worker of IFI can make a protected disclosure, what will happen when a disclosure is made and what IFI will do to protect the reporting person.

Principles

- 1.4.5 Any disclosure of wrongdoing made to IFI will, as a matter of routine, be the subject of an appropriate screening assessment and where relevant, an investigation.
- 1.4.6 At all times, measures will be taken to adequately protect the identity of the worker who has made the disclosure (the 'reporting person'), in accordance with the provisions of the Act.

1.5 Definitions

For the purpose of this policy, the following terms shall, unless the context otherwise requires, have the following meanings:

'the Act'	The Protected Disclosures Act 2014 as amended by the Protected Disclosures (Amendment) Act 2022;
'IFI'	Inland Fisheries Ireland;
'Penalisation'	As defined in paragraph 1.28.2 below;
'Prescribed Person'	A person prescribed by the Minister for Public Expenditure, National Delivery Plan and Reform to receive protected disclosures in accordance with an order under Section 7 of the Act;

‘Protected Disclosure’	A disclosure of relevant information made by a worker, which in the reasonable belief of the worker, tends to show one or more relevant wrongdoings and came to the attention of the worker in a work- related context;
‘Commissioner’	The Office of the Protected Disclosure Commissioner;
‘Relevant wrongdoing’	As defined in paragraph 1.9.1 below;
‘Reasonable belief’	As defined in paragraph 1.10.1 below;
‘Respondent’	Individual who is the subject of a protected disclosure investigation;
‘Subject of a disclosure/ Investigation’	Individual who is a named party in the disclosure or whose role the disclosure relates to;
‘Internal Reporting’	Section 6 of the Act provides that a reporting person may make a disclosure to their employer. This is referred to as “internal reporting”. Where an employer has set up a formal channel and procedures for employees to make disclosures, this is referred to as an “internal reporting channel”.
‘Designated Person(s)’	Person(s), i.e. the IFI Designated Person and PwC with responsibility for administration of the protected disclosures procedures and related communication, and secure, accurate record keeping; the Board Secretariat & Compliance Manager shall act as Designated Person. All references to the Designated Person should be read as ‘Designated Person / Deputy Designated Person’.
‘Deputy IFI Designated Person’	A person working with and on behalf of the IFI Designated Person. All references to the Designated Person should be read as ‘Designated Person / Deputy Designated Person’.
‘Designated Recipients’	conducts reviews of screening assessments of disclosures received by the Designated Persons .
‘Reporting person’	a worker who makes a report in accordance with this Act
‘Worker’	An individual who acquired information on relevant wrongdoings in a work-related context and includes:

- (a) Current and former employees (including permanent, temporary, fixed-term, casual and substitute);
- (b) Individuals who work under any other contract with IFI;
- (c) An individual completing work experience or training for employment with IFI;
- (d) Shareholders;
- (e) Board members including non-executive members;
- (f) Volunteers; and
- (g) Participants in a recruitment process or pre-contractual negotiations.

Certain persons are prescribed to receive protected disclosures (**prescribed persons**). This includes the heads or senior officials of a range of bodies involved in supervision or regulation of certain sectors of the economy or society. The full list of prescribed persons is contained in [S.I. No. 367 of 2020](#).

'Work related context'

Current or past work activities through which, irrespective of the nature of those activities, persons acquire information concerning a relevant wrongdoing and could suffer penalisation if they reported such information.

1.6 Responsibility

The CEO of IFI takes responsibility for the successful operation of this policy and is fully committed to ensuring compliance with the provisions of the Act. The day-to-day responsibility for the application of this protected disclosures policy and procedure is delegated to the Board Secretariat and Compliance Manager. [Update Scheme of Delegation]

1.7 What is a protected disclosure?

1.7.1 A protected disclosure is a disclosure of 'information' which, in the reasonable belief of the worker, tends to show one or more relevant wrongdoings. The information must have come to the attention of the worker in a work-related context. To avail themselves of the protections of the Act, workers must make a disclosure in accordance with the provisions of the Act.

1.7.2 The ordinary meaning of disclosing 'information' is conveying facts, such as stating that particular events have occurred/are occurring/will occur. **This is different to simply making**

an allegation based on a suspicion that is not founded or based on anything tangible.

1.7.3 IFI is responsible for investigating and addressing any wrongdoings reported to it as a protected disclosure. Workers should not investigate matters themselves to find proof of their suspicion. All workers should restrict their actions to disclosing 'information' they have, based on the reasonable belief that it discloses a relevant wrongdoing.

1.8 Who can make a protected disclosure?

1.8.1 A disclosure, as defined under Section 5 of the Act, can be made by any worker who has acquired information on a relevant wrongdoing in a work-related context. A worker is broadly defined so that any prospective, current or former worker, such as an independent contractor, trainee, shareholder, board member, interviewee, and where applicable, staff seconded to IFI from Government Departments or other State agencies, can make a disclosure.

1.8.2 It is possible for employees of other organisations to make a protected disclosure in accordance with [Section 8](#) or [Section 10](#) of the Act, referred to in this policy as a 'disclosure to Minister', or a 'disclosure in other cases' to any person, provided that the relevant criteria are met. Further information is outlined in paragraphs 1.15 – 1.20 below.

1.9 What is a relevant wrongdoing?

1.9.1 Section 5(3) of the Act provides protection for workers of IFI who disclose information in relation to the following relevant wrongdoings:

- a) that an **offence** has been, is being or likely to be committed;
- b) that 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;
- c) that a **miscarriage of justice** has occurred, is occurring or is likely to occur;
- d) that the Health and Safety of an **individual** has been, is being or is likely to be **endangered**;
- e) that the **environment** has been, is being or is likely to be **damaged**;
- f) that a lawful 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;
- g) that an act or omission by or on behalf of a public body is oppressive, discriminatory or grossly negligent or constitutes **gross mismanagement**;
- h) that a breach of specified [EU law set out in Directive 2019/1937](#) has occurred, is

occurring or is likely to occur; or

- i) that information tending to show any matter falling within any of the preceding paragraphs (a) to (h) has been, is being, or is likely to be **concealed or destroyed** or an attempt has been, is being or is likely to be made to conceal or destroy such information.

The Act provides for redress for workers who are penalised because they made a protected disclosure. If the reporting person is dismissed or penalised for making a protected disclosure, a complaint may be made to the Workplace Relations Commission using the [online complaint form](#) available on www.workplacerelements.ie. The complaint should be made within 6 months (or within 12 months if there is a reasonable cause).

Workers who penalise or retaliate against those who have raised concerns under this policy may be subject to disciplinary action.

1.10 What does a reasonable belief mean?

- 1.10.1 A worker must have a reasonable belief that the information disclosed shows, or tends to show, wrongdoing. The term 'reasonable belief' does not mean that the belief has to be correct. Workers may be mistaken in their belief but are acting on the assumption that their belief was based on reasonable grounds.
- 1.10.2 It may be reasonable for a worker to believe that a wrongdoing is occurring on the basis of what they observe. Ideally, some form of evidence to support the reasonable belief held should be provided, enabling the organisation to address allegations.
- 1.10.3 No worker will be penalised for making a disclosure based on a reasonable belief that the information disclosed, showed, or tended to show, wrongdoing.
- 1.10.4 A report made in the absence of a reasonable belief is not a protected disclosure and may result in disciplinary action. It is a criminal offence to make a report that contains any information the reporting person knows to be false. Furthermore, if an unfounded allegation is found to have been made with malicious intent, then disciplinary action will be taken.
- 1.10.5 This policy outlines the process and responsibility of the Designated Person(s) who has been nominated to receive and assess each report and determine whether an investigation is necessary.

1.11 How does a worker make a disclosure?

1.11.1 The Act provides for a 'stepped' disclosure regime with a number of avenues open to workers. In order to avail themselves of the protections under the Act, the reporting person must ensure that the information is disclosed using the internal or external disclosures procedures outlined below.

Making a Protected Disclosure – Internal Reporting Process

1.12 Informal Internal Reporting Process

- 1.12.1 If the disclosure relates to a minor concern, even though a relevant wrongdoing (for example a minor health and safety concern), a worker can raise the disclosure informally rather than using the formal internal reporting process. These concerns should be raised in writing with a worker's line manager who, if they are comfortable doing so, will address the concerns in the first instance.
- 1.12.2 If a disclosure is made using the informal process, the worker may still be entitled to the protections of the Act. However, there is no obligation on the line manager to provide the worker with a formal acknowledgement, follow-up or feedback. Instead, any follow-up or feedback may be provided to the worker by their line manager in an informal manner. If, in the opinion of the line manager, a matter is more appropriate for the formal process, the line manager may direct the worker to submit the disclosure using the formal internal reporting channel.

1.13 Formal Internal Reporting Process

- 1.13.1 IFI operates multiple routes of receiving 'Internal reports';
- By **email** to disclosures@fisheriesireland.ie
 - By **letter** to the 'Designated Person for Protected Disclosures', 3044 Lake Drive, Citywest Business Campus, Dublin 24, D24 CK66
 - **IFI's Internal Reporting Channel** through **PwC's 3rd-party Portal** - via **voice note** or **webform**. PwC (PricewaterhouseCoopers) is an independent party to whom a reporting person can report their concern. This portal is accessible through IFI's website (whistleblower.software.com/secure/ifi).
 - The reporting person has the option to either 'Create a new report' or to 'Follow up on an existing report' via the Internal Reporting Channel. Appendix 2 of this document also includes a QR code which can be scanned to access the Internal Reporting Channel.
 - A reporting person may record a voice message on the portal or may request to meet with PwC to provide the required information set out previously in this policy. The reporting person has the option to distort their voice following recording the oral message should they wish to do so. In the event the reporting person makes a verbal disclosure, their disclosure will be transcribed by PwC and shared with the reporting person to ensure the reporting person has the opportunity to review and agree the transcript as an accurate record of the protected disclosure.
 - When a concern has been raised via the portal, the reporting person will be

provided with access to a secure digital mailbox. This mailbox is only accessible by that person and allows for two-way communication between the reporting person and PwC, whilst preserving their anonymity (should they wish to report anonymously). The reporting person will be provided with a system generated password for the mailbox and it is important that they store this password securely.

- o The reporting person is encouraged to check the mailbox periodically and to respond to any requests.

1.13.2 Reporting persons are required to provide the background and history of the concern, giving relevant details, insofar as is possible, such as dates, sequence of events and description of circumstances.

1.13.3 The disclosure should be factual and not speculative and should contain specific information, including supporting documentation if available, to allow for the proper assessment of the nature and extent of the concern.

1.13.4 The relevant Designated Person (IFI or PwC) will acknowledge receipt of the reported concern within seven days.

1.13.5 The Designated Person within IFI shall forward the report to the 3rd party, i.e. PwC, in order to conduct the 'screening assessment'.

1.13.6 PwC will assess the information provided in the disclosure. In order to do so, they may seek further information (via a message to the unique mailbox within the portal or via IFI (where the reporting person has submitted their report through the disclosures email address or by letter providing contact details)) to request further information or clarification from the reporting person.

1.13.7 When the screening assessment is complete, PwC will advise IFI of their assessment and then refer the matter to IFI(s) Designated Person [Emma Fortune] / Deputy Designated Person [Clíona Ní Bhréartúin] who are competent to diligently follow-up on the concern raised. Appendix 1 of this document sets out IFI's procedure for the receipt of, processing and follow up on protected disclosures.

1.14 Anonymous Disclosures

1.14.3 Anonymous disclosures will be acted upon to the extent possible, although the ability to investigate may be constrained in the absence of knowledge of the identity of the reporting person.

1.14.4 It should be noted that the aspects of the Act may be difficult or impossible to apply (e.g. keeping the reporting person informed) unless they use the PwC portal, and a reporting person cannot obtain redress under the Act without identifying themselves.

1.14.5 Where an anonymous disclosure contains enough information to allow a screening assessment showing prima facie evidence of the occurrence of a relevant wrongdoing, follow-up action will be taken to the extent that it is possible from the information provided.

Making a Protected Disclosure Outside IFI – External Reporting Channels

Inland Fisheries Ireland encourages workers to make protected disclosures internally in accordance with this policy. Such reports will be taken seriously, and workers will receive appropriate protection under the Act. However, in certain circumstances, workers may make a protected disclosure other than through the internal reporting process set out in this policy. A summary of methods of making external disclosures is outlined below. Further information on the procedures for making external disclosures are set in the Act which can be found [here](#), with the insertion of S.7A [here](#) (through the Protected Disclosures (Amendment) Act 2022).

Higher standards apply to external disclosures. Workers should ensure that they familiarise themselves with the higher standard in advance of making an external disclosure. Further information in relation to external disclosures may be found on the Workplace Relations Commission (WRC) website [here](#) and the Citizens Information website [here](#).

1.15 Making a Protected Disclosure to another responsible person

1.15.1 Where a worker reasonably believes that the wrongdoing relates solely or mainly to the conduct of a person other than an employee of IFI, or to something for which that other person has legal responsibility, then the worker can disclose to that other person. For example, if the disclosure relates to a contractor company, to another State Agency or a Department, the disclosure can be made directly to those bodies.

1.15.2 If a report is received by IFI as a responsible person (for example a disclosure received by a contractor or secondee) then IFI will deal with the report in accordance with its internal reporting procedures outlined above.

1.16 Making a Protected Disclosure to Prescribed Persons

1.16.1 Subject to meeting the conditions set out in paragraph 1.16.3 below, a worker may make a protected disclosure to a person prescribed by the Minister of Public Expenditure, NDP Delivery and Reform to receive a protected disclosure (a 'Prescribed Person').

1.16.2 Details of Prescribed Persons can be found in the Protected Disclosures Act 2014 (Disclosure to Prescribed Persons) Order 2020 ([S.I. No. 367 of 2020](#)). Full details of Prescribed Persons can also be located [here](#).

1.16.3 A protected disclosure may be made to a prescribed person where a worker reasonably believes that the relevant wrongdoing falls within the description of matters in respect of which the prescribed person is prescribed. The worker must also reasonably believe that the information disclosed, and any allegation contained in it, are substantially true.

1.17 Making a Protected Disclosure to the Minister

1.17.1 If a worker is or was employed by IFI, the worker may make a protected disclosure to the Minister. To make a protected disclosure to the Minister for the Environment, Climate and Communications (DECC), the worker must reasonably believe that the information disclosed tends to show one or more relevant wrongdoings **and one or more** of the following circumstances must apply:

- a) The worker has previously made a disclosure of substantially the same information to IFI via the internal reporting process, but no feedback has been provided to the worker in response to the disclosure within 21 days, or, where feedback has been provided, the reporting person reasonably believes that there has been no follow-up or that there has been inadequate follow-up.
- b) The worker reasonably believes the Head of IFI (the CEO) is complicit in the relevant wrongdoing reported; or
- c) The worker reasonably believes that the disclosure contains information about a relevant wrongdoing that may constitute an imminent or manifest danger to the public interest, such as where there is an emergency situation or a risk of irreversible damage.

1.18 How to make a disclosure to the Minister

1.18.1 A disclosure to the Minister should be submitted in writing;

- i) by email to: ministerprotecteddisclosures@decc.gov.ie
- ii) by post to: Protected Disclosures, Governance Division
Department of the Environment, Climate and Communications
29-31 Adelaide Road, Dublin 2, D02 X285

1.18.2 A Designated Person (of the Department) is appointed to monitor this mailbox, review and transmit the disclosure and maintain a record for annual reporting purposes.

1.18.3 If the disclosure is submitted to the Minister via ordinary correspondence channels, the disclosure will be forwarded as soon as possible to the Designated Person for review and management. [However, if this mode of submission is utilised it increases the risk of the identity of the reporting person being revealed].

1.18.4 The Designated Person within the Department will acknowledge receipt of the disclosure and will inform the reporting person of the next steps.

1.19 Making a Protected Disclosure to the Office of the Protected Disclosures Commissioner (OPDC)

1.19.1 The OPDC was established primarily to refer disclosures received under the Act to the most appropriate Prescribed Person. If a worker makes a disclosure to the Minister, this will,

subject to the outcome of the high-level review, be referred to the OPDC. If a worker makes a disclosure directly to the Commissioner, the Commissioner will refer the report to the relevant Prescribed Person or 'other suitable person'¹ if a Prescribed Person cannot be identified.

- 1.19.2 Disclosures transmitted to IFI from the OPDC as an 'other suitable person' will be processed in line with the formal internal reporting procedure set out herein.
- 1.19.3 Similar to disclosures made to Prescribed Persons, a protected disclosure may be made to the Commissioner where a worker reasonably believes that the relevant wrongdoing falls within the description of matters in respect of which a Prescribed Person is prescribed. The worker must also reasonably believe that the information disclosed, and any allegation contained in it, are substantially true.

1.20 Making a Protected Disclosure to a Legal Advisor

- 1.20.1 A protected disclosure can be made by a worker in the course of obtaining legal advice from a barrister, solicitor, trade union official or official of an expected body (an expected body is a body which negotiates pay and conditions with an employer but is not a trade union as defined in section 6 of the Trade Union Act 1941).
- 1.20.2 It is important to note that while a worker may disclose information to a legal adviser in the course of obtaining legal advice, it will not be a Protected Disclosure if it is then disclosed by the legal adviser.

1.21 Making a Protected Disclosure in other cases

Alternative external disclosures can be made under Section 10 of the Act, but there are stringent requirements for such disclosures to qualify as Protected Disclosures, including:

¹ **PDA S.10C.(1)(a)(ii)** another suitable person other than a prescribed person who, in the opinion of the Commissioner, appears, by reason of the nature of such person's responsibilities or functions, to be appropriate to be the recipient of the report, and to have the competence to provide feedback and follow-up and protect the identity of the reporting person and persons concerned in a in accordance with S.16 and 16A.

- 1.21.1 That the worker reasonably believes that the information disclosed in the report, and any allegation contained in it, are substantially true.
- 1.21.2 The worker has previously made a disclosure of substantially the same information internally, to another Responsible Person, to a Prescribed Person, the Protected Disclosures Commissioner or the Minister of IFI's parent Department, but no appropriate action was taken within the periods specified under the Act; or
- 1.21.3 The worker reasonably believes that the relevant wrongdoing concerned may constitute an imminent or manifest danger to the public interest, such as where there is an emergency situation or a risk of irreversible damage; or
- 1.21.4 If the worker were to make a report to a Prescribed Person, the Protected Disclosures Commissioner or the relevant Minister:
- there is a risk of penalisation; or
 - there is a low prospect of the relevant wrongdoing being effectively addressed, due to the particular circumstances of the case, such as those where evidence may be concealed or destroyed or where a Prescribed Person may be in collusion with the perpetrator of the wrongdoing or involved in the wrongdoing.

Content and Detail of Disclosures

1.22 Provision of sufficient Information

1.22.1 To ensure that IFI can carry out an adequate assessment of the disclosure, the disclosure should be made in writing and include, at a minimum, the following information:

- a) Provide the reporting person's name, position in IFI, place of work and confidential contact details;
- b) The date of the alleged wrongdoing (if known), or the date the alleged wrongdoing commenced or was identified;
- c) Whether or not the wrongdoing is ongoing;
- d) Indicate whether the wrongdoing has already been disclosed and if so to whom, when and what action was taken;
- e) Provide information in respect of the alleged wrongdoing (what is occurring/has occurred and how) and any supporting information;
- f) Provide relevant information in respect of the relevant wrongdoing including name of the person(s) engaged in the alleged wrongdoing if the worker considers this necessary; and
- g) Any other relevant information.

1.23 Motivation and disciplinary record

1.23.1 The motivation for making a disclosure is irrelevant when determining whether or not it is a disclosure protected by the Act.

1.23.2 A disclosure made in the absence of a reasonable belief will not attract the protection of the Act and may result in disciplinary action against the reporting person. Disclosure of a wrongdoing does not, *per se*, confer any protection or immunity on a worker in relation to any involvement they may have in that wrongdoing.

1.23.3 In general, where a protected disclosure is made by the reporting person during an investigation, disciplinary or other process involving the reporting person, this should not affect those distinct processes, except where the investigation, disciplinary or other action represents, in essence, a form of penalisation for making a protected disclosure.

1.23.4 Where a reporting person has made a disclosure, whether assessed or investigated, the reporting person is required to conduct themselves professionally and to continue to execute their duties. Ongoing management of a reporting person does not constitute penalisation. This can include the taking of disciplinary action against the reporting person for matters unrelated to the substance of the report.

When a disclosure is not a Protected Disclosure

1.24 Protected disclosures vs Interpersonal grievances

- 1.24.1 It is important to note the distinction between an interpersonal grievance and a disclosure of wrongdoing or protected disclosure. **A matter concerning interpersonal grievances exclusively affecting a reporting person, such as grievances about interpersonal conflicts between the reporting person and another worker, or a complaint which concerns the reporting person exclusively,** is not a relevant wrongdoing for the purposes of the Act.
- 1.24.2 The Protected Disclosures Policy and protected disclosures reporting process is not a substitute for the organisation's existing [Grievance](#) and [Dignity at Work](#) policies and the reporting person will be informed where matters are more appropriately dealt with under these policies.
- 1.24.3 However, if a complaint of penalisation contrary to the Act is made, then that complaint will be dealt with, having regard to the provisions of the Act, to the continuing obligation to protect the identity of the reporting person, under the Act.
- 1.24.4 If it is unclear whether a disclosure is a protected disclosure or an interpersonal grievance, it will be dealt with under the Protected Disclosures Policy until such time as a screening assessment has been made in respect of the disclosure.

1.25 Function of worker or employer to detect wrongdoing

- 1.25.1 A disclosure will not be a relevant wrongdoing if it is a matter which it is the function of the worker or the worker's employer to detect or investigate or prosecute and the protections of the Act will not apply in such circumstances. However, a matter will still be a protected disclosure if the wrongdoing involves an act or omission on the part of the employer.

1.26 Disclosure by legal advisor

- 1.26.1 Information disclosed to a legal adviser in the course of obtaining legal advice will not be a protected disclosure if it is then disclosed by the legal adviser.

Protecting the Identity of the Reporting person

1.27 Measures in protecting the identity of the reporting person

1.27.1 The Act imposes a **legal obligation** to keep the **reporting person's identity confidential** and sets out the extent of that obligation. Those involved in the processing of a protected disclosure must take care that in relation to the security and management of records (whether digital or manual) the reporting person's identity is protected.

S.14A of the Act, subject to the exemptions provided therein, sets out a range of criminal offences for breaches of the protections provided by the Act, i.e. a person commits an offence if they breach the duty of confidentiality regarding the identity of reporting persons.

1.27.2 The identity of the reporting person (or information that might reveal the identity of the reporting person) will **not be disclosed** by the Designated Person or any other person in IFI who receives the disclosure **without the explicit consent of the reporting person**, other than strictly within the provisions permitted in the Act. However, this does not include people with whom the Designated Person reasonably considers it necessary to share the reporting person's identity for the purposes of the receipt, transmission, or follow-up of the report.

1.27.3 Save where required in respect of follow-up or investigation of the disclosure, or in accordance with the provisions of Sections 16 and 16A of the Act, the Designated Person(s) will not disclose to another person any information that might identify the reporting person without the consent of the reporting person except when:

1.27.3.1 The Designated Person shows that they took all **reasonable steps to avoid disclosing** the identity of a reporting person;

1.27.3.2 The Designated Person has a reasonable belief that it was necessary for the **prevention of serious risk to the security of the State, public health, public safety or the environment;**

1.27.3.3 Where the disclosure is otherwise **required by law;** or

1.27.3.4 Where the disclosure is a necessary and proportionate obligation imposed by **European Union law** or the law of Ireland in the context of investigations or judicial proceedings.

1.27.4 Where the Designated Person(s) considers it necessary to disclose the identity of the reporting person in accordance with paragraph [1.27.2](#) of this policy, the reporting person will be **informed** of this decision in advance of the disclosure and the reasons for the disclosure, unless the notification would jeopardise:

1.27.4.1 The effective investigation of the wrongdoing concerned;

1.27.4.2 The prevention of serious risk to the security of the State, public health, public safety or the environment; or

- 1.27.4.3 The prevention of crime or prosecution of a criminal offence.
- 1.27.5 The reporting person may seek a review of the Designated Person(s)'s decision to disclose their identity by submitting a request in writing to disclosures@fisheriesireland.ie. The review will then be carried out by a reviewer who has not previously been involved in the processing of the protected disclosure such as IFI's legal advisor.
- 1.27.6 If the reporting person has a concern that their identity is not being protected during the protected disclosures process, the reporting person should notify the IFI Designated Person by email at disclosures@fisheriesireland.ie. The Designated Person will then assess the notification and, if relevant, **refer the matter to IFI's Head of Internal Audit for examination** of the systems operated or actions taken by the Designated Person. A report of this review will be provided to the reporting person in order to provide assurance of the management of the protected disclosure process.
- 1.27.7 Disciplinary proceedings by the HR Division may be invoked against any individual who attempts, either successfully or unsuccessfully, to identify the reporting person without their consent or without falling within the exceptional grounds outlined above.

Protecting Reporting persons from Penalisation

1.28 Protecting reporting persons from penalisation

1.28.1 Penalisation of a person who makes a protected disclosure will not be tolerated by the Minister, and disciplinary proceedings may be invoked against any employee who engages in penalisation or threatened penalisation of an employee making a disclosure.

1.28.2 Penalisation under the Act means any direct or indirect act or omission which occurs in a work-related context, is prompted by the making of a report and causes or may cause unjustified detriment to a worker, and, in particular, includes;

- suspension, lay-off or dismissal,
- demotion, loss of opportunity for promotion or withholding of promotion,
- transfer of duties, change of location of place of work, reduction in wages or change in working hours,
- the imposition or administering of any discipline, reprimand or other penalty (including a financial penalty),
- coercion, intimidation, harassment or ostracism,
- discrimination, disadvantage or unfair treatment
- injury, damage or loss,
- threat of reprisal,
- withholding of training,
- a negative performance assessment or employment reference,
- failure to convert a temporary employment contract into a permanent one, where the worker had a legitimate expectation that they would be offered permanent employment,
- failure to renew or early termination of a temporary employment contract,
- harm, including to the worker's reputation, particularly in social media, or financial loss, including loss of business and loss of income,
- blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry,
- early termination or cancellation of a contract for goods or services,
- cancellation of a licence or permit, and
- psychiatric or medical referrals.

1.28.3 Penalisation of workers who make a disclosure will not be tolerated and workers who believe that they are being subjected to adverse treatment should report the matter immediately to a Designated Person at disclosures@fisheriesireland.ie. Any notification of penalisation following a disclosure will be fully assessed and investigated by the HR Division and appropriate action (up to and including disciplinary action) may be taken where

appropriate and necessary.

- 1.28.4 A worker who considers that they have been penalised for making a protected disclosure is also entitled to issue proceedings in the Workplace Relations Commission or claim injunctive relief in the Circuit Court. The relevant time limits that apply for bringing a penalisation claim to the Workplace Relations Commission is 6 months from the date of the penalisation or, for the Circuit Court, within 21 days of the last instance of penalisation.

Reporting Requirements

1.29 Reporting requirements

- 1.29.1 In accordance with Section 22 of the Act, IFI will publish a report no later than 31 March each year including the information required under Section 22 of the Act and a statement confirming that there are internal and external reporting channels and procedures for dealing with protected disclosures.
- 1.29.2 In order to ensure the principles of fair procedures and natural justice are applied, all protected disclosures received will be assessed and investigated as quickly as possible; however, it is impossible to include a timeframe for completion of any investigation. Periodic feedback in relation to matters disclosed will be provided to the reporting person by the Designated Person during the course of the investigation.
- 1.29.3 This policy and the procedures outlined herein will be reviewed periodically and at least every two years by the Finance and Corporate Services Division. The policy may be revoked, replaced or amended at any time and staff will be informed of any changes that are made.

Data Protection

1.30 Data Protection

- 1.30.1 The principles of data protection will apply to the operation of this policy. This includes ensuring that there are adequate and appropriate safeguards around the management of protected disclosures and minimising the processing of personal data so that only personal data that is adequate, relevant and limited to what is necessary are processed.
- 1.30.2 Records of reports will be retained, including anonymous reports (7 years)
- 1.30.3 All personal data will be processed in accordance with applicable data protection law, including the General Data Protection Regulation (GDPR).
- 1.30.4 IFI will prevent access by unauthorised persons to personal data processed for the purposes of the Act and ensure it is only disclosed to authorised persons.
- 1.30.5 It is important to note that section 16B of the Protected Disclosures Act imposes certain restrictions on data subject rights, as allowed under Article 23 of the GDPR.

Independent Advice and Support

1.31 Independent advice and support

- 1.31.1 If a worker is considering making a protected disclosure or has already made a protected disclosure, independent advice and support is available from Transparency International Ireland and from Citizen's Information. These services can be accessed using the following contact details:

[Transparency International Ireland](#) – Speak Up Helpline: 1800 844 866

[Citizens Information](#) – Phone Service: 0818 07 4000

[Office of the Protected Disclosures Commission \(OPDC\)](#) – 01 639 5650

Appendix 1 – Internal Procedures for managing Protected Disclosures in Inland Fisheries Ireland

1. Acknowledgement of a disclosure

- 1.1. When a disclosure has been received via the internal reporting channels set out in this policy, The Designated Person(s) will write to the reporting person to acknowledge receipt within **7 days of receiving the disclosure.**

2. Assessment of the disclosure

- 2.1. PwC will **assess** the information provided in a reporting person's disclosure. In order to do so, PwC may send a message to their unique mailbox, to request further information or clarification from them. We would encourage the reporting person to check the mailbox periodically and to respond to any requests of this nature.
- 2.2. It may be necessary, as part of the screening process, to **differentiate** between protected disclosures and personal employment complaints. In some cases, the information provided may involve both. The disclosure should be assessed to determine the nature of the information disclosed and the procedure or procedures that is/are most appropriate to be used to investigate the matter.
- 2.3. A disclosure may be broken down into a **series of separate** allegations or parts, each of which may need to be followed up separately or approached differently according to the circumstances.
- 2.4. If it is **unclear** whether the disclosure qualifies as a protected disclosure, the Designated Person(s) should treat the disclosure as a protected disclosure (and protect the identity of the reporting person in accordance with the procedures) until satisfied that the report is not a protected disclosure.
- 2.5. When PwC has conducted the screening assessment and determines that there is **no prima facie** evidence that a relevant wrongdoing may have occurred, then the matter can be closed (or referred to another internal process, as above), and the reporting person notified by PwC.
- 2.6. PwC will make **recommendations** as to whether the report received is a protected disclosure within the meaning of the Act, and/or, whether the report contains **prima facie** evidence that a relevant wrongdoing might have 'occurred, may be occurring or may occur in the future'.
- 2.7. The Designated Person(s) within IFI shall confirm their **satisfaction** with the assessment finding. If satisfaction is expressed, and there is **prima facie** evidence of a relevant wrongdoing, appropriate action will be taken to address the wrongdoing, having regard

to the nature and seriousness of the matter. In the event that IFI's Designated Person(s) is not satisfied with the finding of PwC, they may request further information or vary the finding.

2.8. The Designated Person should declare any **conflicts of interest** in relation to the subject or the parties involved in a disclosure and shall recuse themselves from the assessment and an alternate qualified member of staff shall be appointed by the CEO.

2.9. Potential outcomes may include the following:

2.9.1. that there is prima facie evidence that a relevant wrongdoing may have occurred but that the relevant wrongdoing is **clearly minor and does not require follow up**. If this decision is made, the procedure will be closed and the reporting person will be notified in writing as soon as practicable of the decision and the reasons for it.

2.9.2. that all or part of a report is a **repetitive report** that does not contain any meaningful new information compared to a previous report. If this decision is made the procedure will be closed and the reporting person will be notified in writing as soon as practicable of the decision and the reasons for it.

2.9.3. that an **informal process may be used to address** a disclosure where the alleged relevant wrongdoing is relatively straightforward or not very serious or does not require consideration of the making of adverse findings about any individual.

2.10. Where the IFI Designated Person(s) forms the view that a full investigation is warranted, the Designated person(s) must inform the following parties, ensuring the identity of the reporting person is protected:

2.10.1. the CEO who shall ensure that the Chair is informed;

2.10.2. the Reporting Person, who will be provided with periodic feedback; and

2.10.3. the Respondent(s) as part of progressing an investigation

2.11. If the Designated person(s) is the subject of a disclosure, they shall recuse themselves from the assessment and the deputy Designated person shall assume the role of the Designated person for that disclosure.

3. Review of a screening assessment

3.1. Where, following a screening assessment by PwC, it is determined that no further action or investigation is warranted, the Reporting Person has the right to request a review of the assessment, via the Internal Reporting Channel.

3.2. PwC shall arrange that the matter be referred to the Designated Person for review, to ensure that they are satisfied with the screening assessment and shall inform the Reporting Person of this action.

- 3.3. Where the IFI Designated Person upholds the finding of PwC regarding the screening assessment, they will document their rationale, inform PwC, and the Reporting Person shall be informed, and the matter will be closed.
- 3.4. Where the IFI Designated Person varies the finding of PwC regarding the screening assessment and forms the view that there is prima facie evidence of a wrongdoing, and an investigation is warranted, they shall inform the CEO.

4. Investigation

- 4.1. Where the Designated Person reports that an investigation is warranted, an investigation will commence as soon as practicable. Terms of Reference for the investigation will be drafted and agreed. A copy of the Terms of reference will be provided
- 4.2. Investigations in cases of alleged serious wrongdoing will be carried out, as appropriate depending on the context, background, nature and scale of the alleged wrongdoing (the CEO having the ultimate authority in this regard) by:
 - a) External professional experts in a particular area; this could include investigators from any approved framework in place for the Civil/Public service; or
 - b) An Garda Síochána or another body with appropriate investigatory powers/functions.
- 4.3. Investigations will be undertaken in accordance with the general principles of natural justice and fair procedures and any other relevant procedures of IFI, as appropriate. [LINK TO INVESTIGATIONS POLICY & PROCEDURE - TO BE COMPLETED](#)
- 4.4. Responsibility for investigating and addressing allegations of wrongdoing lies with IFI and not the reporting person. Reporting persons should not attempt to investigate wrongdoing themselves.

5. Feedback to the Reporting Person

- 5.1. Feedback will be provided to the Reporting Person within three months of acknowledgment of receipt of the disclosure, and at three-month intervals thereafter, if required.
- 5.2. Feedback means information on the action envisaged or taken as follow-up and the reasons for such follow-up. Follow-up means any action taken by PwC to assess the accuracy of the information and, where relevant, to address the wrongdoing reported.
- 5.3. An important consideration when providing feedback is that no information is communicated that could prejudice the outcome of the investigation or any action that ensues (e.g. disciplinary, or other legal action, including prosecution), as to do so may undermine the right to fair procedures of the person against whom a report or disclosure is made.

- 5.4. Other than in exceptional cases, workers making protected disclosures should be provided with periodic feedback in relation to matters disclosed and be advised when consideration of the disclosure is complete.
- 5.5. Any information and feedback should be provided in confidence. A reporting person should be informed that appropriate action has been taken but not generally entitled to know what that action was.
- 5.6. Feedback provided to the reporting person should not be disclosed further other than to their legal adviser or trade union representative or unless the information forms part of a further protected disclosure being made via another channel.
- 5.7. The reporting person will not be informed of the commencement, progress or outcome of any disciplinary process involving another worker, which may arise on foot of an investigation progressed as a result of their disclosure.

6. Individuals Implicated in Protected Disclosures

- 6.1 Where reports of wrongdoing are assessed and require investigation, any worker the subject matter of a disclosure under the Act will be advised in writing:
- that a disclosure has been made under the Act which may be relevant to the individual concerned;
 - that a protected disclosure, having been screened, is now being investigated;
 - that no conclusions have been/will be drawn by IFI until such time as the matter has been investigated;
 - that they are required to assist the investigation as far as reasonably possible;
 - that they may be interviewed and that they may have an appropriate representative in the form of a co-worker or trade union representative present at the interview;
 - that they have a right to make a statement in respect of the allegation(s) made against them; and that as far as reasonably possible, their confidentiality and privacy will be respected; and
 - that they have a right to request a review of the outcome of the investigation.

Workers have access to IFI's welfare supports, i.e. Employee Assistance Service Spectrum.Life ²

7. Review of Investigations

- 7.1. A reporting person or a named respondent in the disclosure may seek a review of the outcome of an investigation. The CEO, with guidance from PwC or Designated Person,

² SPECTRUM LIFE Contact details [here](#), 01 518 0356

will arrange for a review of the outcome of the investigation by a person who has not been involved in the screening assessment and/or review of the screening assessment and/or the investigation.

7.2. If a review of the initial investigation is required and has been undertaken, the person appointed to complete the investigation will prepare a report for the CEO, setting out their findings. The resultant action will be determined by the outcome of the investigation. The Designated Person will inform the worker and/or the respondent that the investigation is complete but is not required to provide any information on the detail of the investigation.

7.3. If, after an appropriate investigation has been undertaken, it is determined that wrongdoing has occurred, the findings will be addressed, and appropriate action will be taken.

8. Protection of a Reporting person; Right of a Reporting Person to ask for a review of a decision to disclose the identity of the Reporting Person (except in exceptional circumstances)

8.1. If a Reporting Person considers that he or she has been penalised as a result of having made a protected disclosure or wishes to appeal a decision to disclose their identity, the reporting person should inform the Head of Human Resources and/or the Designated Person. The Head of Human Resources will arrange for the matter to be considered, investigated as necessary, remediated where suitable and will assess whether it is necessary to disclose their identity.

Appendix 2 – Links to Internal Reporting Channel

Available on the Company's website (www.fisheriesireland.ie)

Internal Reporting Channel link

whistleblowersoftware.com/secure/ifi

Internal Reporting Channel QR code



Iascach Intíre Éireann
Inland Fisheries Ireland



Appendix 3 – Template Decision Matrix

The Protected Disclosures Policy (the “Policy”) of Inland Fisheries Ireland (IFI) outlines the internal procedures for managing Protected Disclosures received by IFI In accordance with the Policy, a screening assessment is conducted on each disclosure received to determine whether further action should be taken			
The below decision matrix used for determination in respect of a disclosure			
	Yes/No	Application to Disclosure	Commentary
Has the information been disclosed by a 'worker'?			Section 3 of the Act is broad and defines 'worker' as including current or former employees, individuals engaged to provide works under a contract, suppliers, interns and trainees, shareholders, officers and non-executive members of a company, volunteers and prospective employees. Individuals involved in a recruitment process or pre-contractual negotiations are also captured by the determination.
Is there a disclosure of information?			A statement must have sufficient factual content and specificity in order to qualify as a protected disclosure. For example – “you are not complying with Health and Safety requirements” is a mere allegation that does not contain sufficient factual information to allow an assessment of the information.
Has the disclosure been made to the employer? Or another relevant individual?			The disclosure must have been submitted via the relevant internal or external reporting channels.
Is the information based on a reasonable belief?			The term “reasonable belief” does not mean that the belief has to be correct. Reporting persons are entitled to be mistaken in their belief, so long as their belief was based on reasonable grounds.
Did the information come to the attention of the worker in a work-related context?			A work-related context means current or past work activities which, irrespective of the nature of these activities, the reporting person acquires information concerning a relevant wrongdoing. This includes activities related to work such as training, travel and employer arranged social events. The information does not need to become known as part of the reporting person's own duties, or even relate to the reporting person's own employer, as long as the information comes to the attention of the reporting person in a work-related context.
Is the information disclosed a 'relevant wrongdoing'?			Section 5(3) of the Act provides that a relevant wrongdoing includes offences, failure to comply with legal obligations, miscarriage of justice, health and safety issues, environmental issues, improper use of funds, oppressive, discriminatory or grossly negligent actions of a public body, breach of legislation or concealment / attempted concealment of any of the above.
Interpersonal grievance?			A matter concerning interpersonal grievances exclusively affecting a reporting person, such as grievances about interpersonal conflicts involving the reporting person and another worker, are not relevant wrongdoings for the purpose of the Act. If it is unclear as to whether a report is an interpersonal grievance exclusively affecting a reporting person / a complaint concerning the worker exclusively, or a protected disclosure, the information should be treated as a protected disclosure until otherwise established.
Function of worker to detect wrongdoing?			Section 5(5) of the Act provides that a matter is not a relevant wrongdoing (and does not come within the terms or attract the protections and redress of the Act) 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. Even if the wrongdoing is a function of the reporting person to detect, investigate or prosecute, it will still be a protected disclosure if the wrongdoing involves an act or omission on the part of the employer.
Anonymous disclosure?			Where the anonymous report contains enough information to allow a screening assessment, it must be established that there is prima facie evidence that a relevant wrongdoing has occurred.
	Determination:		
	Full Investigation warranted:		

Appendix 4 – PwC Whistleblowing Portal Interface

Welcome [TAB]

As outlined in Inland Fisheries Ireland's code of business conduct, Inland Fisheries Ireland is committed to conducting its affairs with openness, honesty and integrity. An important aspect of integrity and transparency is a mechanism to enable all workers to voice concerns, in confidence, in a responsible and effective manner.

Making a "protected disclosure" refers to a situation where a person who is in a work-based relationship with Inland Fisheries Ireland discloses information in relation to wrongdoing that the person has acquired in the context of current or past work-related activity. This is sometimes referred to as "whistleblowing".

For the purposes of this guidance such a person is referred to as a "worker" or "reporting person" and disclosing information in relation to alleged wrongdoing is referred to as "making a report" or "making a disclosure".

How to make a Protected Disclosure

This reporting link enables you to submit your concerns about actual or potential breaches, unethical and/or illegal activities, irregularities, wrongdoings, unlawful behaviour and financial misconduct.

Any report submitted by you through this reporting link will be received by an external third party, PwC (PricewaterhouseCoopers). As an independent firm, PwC will ensure an independent, confidential channel for you to report your concern or suspicion.

Interpersonal Grievances

If you are concerned in relation to your own employment or personal circumstances in the workplace, it should be dealt with through Inland Fisheries Ireland's HR policies, i.e. Dignity at Work Policy and Grievance Policy.

Protection for you

Provided workers make a statement which they reasonably believe to be true, they have a right not to suffer any detriment by virtue of having made such a disclosure. Where such concerns reported by a worker are found to be groundless or undetermined, no sanctions will be imposed on the reporting person by Inland Fisheries Ireland.

Protected Disclosures Policy

Please refer to the protected disclosures policy tab for further details regarding the Inland Fisheries Ireland measures in place to protect your identity.

Protected Disclosures Policy [TAB]

The Board of Inland Fisheries Ireland (IFI) is strongly committed to fostering a culture which encourages and supports the organisation's workers to 'speak up' on any issue covered in the Protected Disclosures Act 2014 (as amended). IFI benefits from such disclosures in that it may, for example, prevent the leaking of confidential information, reduce health and safety risks, limit potential financial and reputational damage and contribute to improved trust, confidence and morale of staff.

Those working in IFI will often be the first people to become aware of the signs of wrongdoing. They therefore play an essential role in early detection of behaviour that could damage IFI, its employees or the public it serves if permitted to continue. Nurturing a receptive culture and maintaining appropriate procedures is central to encouraging workers to make disclosures directly to IFI.

Under this policy a worker is entitled to raise concerns or disclose information without fear of penalisation or the threat of less favourable treatment, discrimination or disadvantage.

PwC (PricewaterhouseCoopers) is an independent party, operating on behalf of IFI, to whom a reporting person can report their concern, ensuring confidentiality through this portal.

IFI's Protected Disclosures policy can be viewed here. [add link]

Privacy Notice [TAB]

All legal entities in the private and public sector who receive a protected disclosure in accordance with section 6 and all prescribed persons who receive a protected disclosure in accordance with section 7 and all Ministers who receive a protected disclosure in accordance with section 8 shall keep records of every protected disclosure they receive. Reports shall be stored for no longer than is necessary and proportionate to comply with the provisions of this or any other enactment.

Personal data shall be processed in line with Inland Fisheries Ireland's Data Protection Policy.

Portal Anonymity [TAB]

Introduction

You can decide whether to raise a concern confidentially (i.e. provide your personal contact details) or anonymously.

If you wish to remain anonymous, do not disclose your name or other personally identifiable information, such as address or phone number. If you choose to remain anonymous, you can still engage in a dialogue and we can ask clarifying questions or request additional information or documentation. You are also able to follow up on your report, and check the status of your report.

PwC has a better opportunity to assess the concern if we are able to communicate with you. If you would like to engage in dialogue with PwC, you need to provide us with your contact information. If you decide to disclose your identity to PwC, your identity will only be known by PwC. PwC will safeguard your anonymity throughout the process and information regarding your identity will under no circumstances be disclosed by us unless you grant such explicit permission.

Confidential reporting explained

The reporting channel is established and operated in a secure manner that ensures the confidentiality of the identity of the reporting person, i.e. whistleblower.

PwC, and any designated impartial person within Inland Fisheries Ireland that is competent to follow up on the concern raised, cannot disclose to any other person any information which might reveal your identity.

Anonymous reporting explained

The whistleblower reporting system makes it possible for you to raise a concern anonymously as it is not a requirement for you to provide your personal contact details. As a reporting person, you decide whether to raise the concern anonymously or provide your personal contact details.

If you raise the concern anonymously, you will have the option to decide whether you want to be available for follow up by setting up a secure and anonymous mailbox through which PwC or Inland Fisheries Ireland can contact you. It is recommended that you do this as it can often be difficult for Inland Fisheries Ireland to conduct an investigation without any further information from you. This mailbox allows for two-way communication between you and Inland Fisheries Ireland, while preserving your anonymity. For example it provides PwC and/or Inland Fisheries Ireland-with the opportunity to ask you some follow up questions which may be relevant to the concern raised. Should you select the mailbox option, it is important that you check the mailbox periodically in order to monitor the progress of your report and receive any follow up questions.

The reporting system does not log the IP address or the machine ID of the computer on which a

concern is raised, and the system does not use any cookies.

If you decide to raise the concern anonymously, neither Inland Fisheries Ireland nor a third party will generally process your personal data. If, when raising the concern, you provide personal data, Inland Fisheries Ireland will, however, be entitled to process such data. This is the case even if you have raised the concern anonymously.

Other considerations

In certain limited circumstances, employees should be aware that, in certain limited circumstances, disclosure of the concern by the employer to third parties may be required. An example of this is if the disclosure of the information is necessary for preventing serious risk to the security of the State, public health, or environment.

Online Form [Button]

Create new disclosure

(▲ I want to report orally)

Subject (Required)

Choose how you would like to report:

Report confidentially

You can choose to report confidentially. Your identity will only be known to those who handle your disclosure in confidence, and your identity will appear anonymous and confidential to others in disclosure processing.

The designated person, or anyone else with whom a report is shared to allow them to carry out their functions in relation to the report or to investigate the report, cannot disclose the identity of the reporting person to anyone else (or any information that might reveal the identity of the reporting person) without your explicit consent, other than strictly within the provisions permitted in the Act.

It is always recommended to use the confidential reporting option, as it provides the best possible processing of disclosures and ensures you the best possible protection.

Report anonymously

You can choose to report anonymously if you prefer not to provide your identity to anyone in the process.

If you choose to report anonymously, you should make sure you do not leave any electronic traces in the process. Do not contact the PwC portal through an IFI-provided PC or mobile phone. That way you will have the best possible protection as an anonymous whistleblower.

Description (Required)

Categories (Required)

Select a category from a dropdown list:

- Animal health, animal welfare and public health
- Bribery
- Consumer protection
- Corruption
- Criminal Offences
- Environmental protection
- Fraud
- Harassment & bullying
- Money laundering
- Other
- Procurement fraud
- Protection of personal data
- Protection of privacy and personal information
- Rights and protection of individuals
- Theft
- Transport safety
- Violations of EU law

Name (Required)

Email (Required)

What relationship do you have with Inland Fisheries Ireland? (Required)

When did the wrongdoing take place? (Required)

How did you become aware of the wrongdoing case? (Required)

Which people are involved or could know more about the wrongdoing? (Required)

Is the management of Inland Fisheries Ireland aware of the wrongdoing? (Required)

Files

[Submit](#)