Iascach Intíre Éireann
Inland Fisheries Ireland

IFI Protected Disclosures Policy

Name of Document:	IFI Protected Disclosure (Whistleblowing) Policy				
Authorised Officer:	Head of Finance and Corporate Services				
Description of Content:	IFI's policy and procedure for the receipt and management of confidential reports of wrongdoing by workers				
Approved by:	Board of IFI				
Date of Approval:	September 2026				
Assigned review period:	2 years				
Date of next review:	June 2028				
This document comprises:	TOC	Text	List of tables	List of Figures	Appendices
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Version Control Table

Version	Status	Modified by/Prompt	Reviewed	Approved	Date
V1	Final	Chief Executive Officer	SMT	Board	24.06.2011
V2	Draft	Gov. Officer - S. 21(1) PD Act 2014	ARC		NA
V2.1	Final	Gov. Officer - DPER Guidance 2016	ARC	Board	Oct 2016
V2.2	Final	Gov. Officer - Board Decision to separate Policy and Procedure		Board	Dec 2016
V3	Final	Gov. Officer - Inclusion of Procedure for Anonymous reports		Board	Dec 2017
V3.1	Final	Gov. Officer - SI 367, 2020 – Prescribed Persons	ARC	Board	Sept 2020
V4	Final	Compliance Manager - PD (Amended) 2022	SMT	Board	Oct 2023
V5	Final	Review by PwC/Gov. Officer/Compliance Mgr /ELT	ARC	Board	June 2025
V6	Final	Compliance Mgr / Head of Finance & Corporate Services /ELT	ARC	Board	Sept 2026

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Protected Disclosures Policy

1.1 Introduction

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[2] 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.

[2] Section 6A of the PD Amendment Act 2022 inserted an explanation of 'Diligent follow-up which involves the 'carrying out of an **initial assessment,** including seeking further information from the reporting person if required, as to whether there is prima facie evidence that a relevant wrongdoing may have occurred.

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;
'Commissioner'	The person who holds the office of Protected Disclosures Commissioner established by *section 10A of the Act*. The Office of the Protected Disclosure Commissioner (OPDC);
'Deputy Designated Person'	A person working with and on behalf of the Designated Person. All references to the Designated Person should be read as 'Designated Person / Deputy Designated Person'.
'Designated Person(s)'	Person(s) with responsibility for administration of the protected disclosures procedures and related communication, and secure, accurate record keeping; the Secretariat & Compliance Manager shall act as Designated Person within IFI and an appointed independent 3rd party performs a role as Designated Person for the purpose of conducting screening assessment.
'Feedback'	The provision to a reporting person of information on the action envisaged or taken as follow-up and on the reasons for such follow-up;
'Follow-up'[3]	Means any action taken by— (a) the recipient of a report made in the manner specified in *section 6* or *7*, or (b) a person to whom a report is transmitted under *section 7A*, *8*, *10C* or *10D*, to assess the accuracy of the information contained in the report and, where relevant, to address the relevant wrongdoing reported, including, but not limited to, actions such as an internal inquiry, an investigation, prosecution, an action for recovery of funds or the closure of the procedure;
'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".
'Penalisation'	As defined in paragraph 1.28.2 below;

[3] Protected Disclosures Act 2014 | Law Reform

'Person concerned'	Means a natural or legal person who is referred to in a disclosure as a person to whom the relevant wrongdoing is attributed or with whom that person is associated
'Prescribed Person'	A prescribed person means a person prescribed by order under *section 7 of the Act*. The full list of prescribed persons is contained in S.I. No. 367 of 2020.
'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;
'Reasonable belief'	As defined in paragraph 1.10.1 below;
'Relevant Information'	Information is relevant if it came to a worker's attention in a work-related context and the worker reasonably believes that it tends to show *wrongdoing*. 'A report' or 'a disclosure' of relevant information under the Act are interchangeable terms having the same meaning.
'Relevant wrongdoing'	As defined in paragraph 1.9.1 below;
'Report Recipient'	Upon the conclusion of an initial assessment which finds that a report shows prima facie evidence of a relevant wrongdoing, the Designated Person will nominate a 'Report Recipient' to decide on the 'follow up' action to be taken.
'Reporting person'	A worker who makes a report in accordance with the Act
'Respondent'	Individual who is the subject of an investigation;
'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.
'Worker'	(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) Board members including non-executive members; (e) Volunteers; and (f) Participants in a recruitment process or pre-contractual negotiations.

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 Secretariat and Compliance Manager.

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 wrongdoing 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 on www.workplacerelations.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 Channel

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 or feedback. Instead, any 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 receipt of reports to its **Internal Reporting Channel**;

- By **email** to disclosures@fisheriesireland.ie
- By **letter** to the 'Designated Person for Protected Disclosures', Inland Fisheries Ireland 3044 Lake Drive, Citywest Business Campus, Dublin 24, D24 CK66
- By **3rd party Portal**

  An independent 3rd party, appointed by IFI, to whom a reporting person can make a report of wrongdoing. This portal is accessible through IFI's website (**IFI's Protected Disclosures Portal**).

  The reporting person has the option to either 'Create a new report' or to 'Follow up on an existing report'. Appendix 2 of this policy contains a QR code which can be scanned to access the **Protected Disclosures Portal**. This QR code is on display in all IFI offices.

  - The reporting person may record a **voice message** on the portal. The reporting person has the option to distort their voice following recording the oral message. In the event the reporting person makes a verbal disclosure, their disclosure will be transcribed by IFI's appointed independent 3rd party and shared with the reporting person for review and agreement as an accurate record of the disclosure of relevant information.

- The reporting person may **request to meet with IFI's appointed independent 3rd party** to provide the required information set out previously in this policy.
- When a disclosure has been reported 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 IFI's appointed independent 3rd party, whilst preserving their anonymity (should they wish to report anonymously). The reporting person will be provided with a system generated password for the mailbox which **must be stored securely.**
- 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 matters raised in the disclosure, giving relevant details, insofar as is possible, such as dates, sequence of events and description of circumstances.

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

1.13.3 The Designated Person (IFI or IFI's appointed independent 3rd party), depending on which route of the Internal Reporting Channel is utilised) will acknowledge receipt of the disclosure within seven days.

1.13.4 Where a report received directly by IFI's Designated Person, it shall be forwarded to IFI's appointed independent 3rd party to progress the 'screening assessment' as soon as possible.

1.13.5 An assessment of the information provided in the disclosure will be conducted. In order to do so, they may seek further information from the reporting person (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).

1.13.6 When the screening assessment is complete, the appointed independent 3rd party will advise IFI of the outcome of assessment, providing recommendations. The assessment is sent to IFI's Designated Person.

1.13.7 It is the role of the IFI Designated Person (or the Deputy Designated Person) to provide feedback to the reporting person within 3 months of receipt of the report, on actions

taken or planned. This can be extended to 6 months in complex cases.

1.13.8 Where IFI's appointed independent 3rd party finds the report does not contain information showing prima facie evidence of the occurrence of a relevant wrongdoing, the Designated Person shall notify the reporting person of this and where applicable, refer the reporting person to an alternative HR policy that may be relevant in dealing with the matter(s) raised.

1.14 Anonymous Disclosures

1.14.1 Anonymous disclosures shall **ONLY** be accepted when reported via IFI's **Protected Disclosures Portal.**

1.14.2 Anonymous disclosures received **by any other means will not be processed** by IFI.

1.14.3 As outlined under section 1.13.1 when reporting through the **Protected Disclosures Portal**, the reporting person may communicate anonymously with IFI's appointed independent 3rd party regarding their report of relevant information.

1.14.4 The **Protected Disclosures Portal** provides an opportunity for IFI's appointed independent 3rd party to seek further information as part of the screening assessment process.

Outcome of Screening (Initial) Assessment – Report Recipient

- Where information showing prima facie evidence of the occurrence of a relevant wrongdoing is identified as part of the screening assessment, the Designated Person shall select a Report Recipient to decide on the action(s) to be taken.[4]

- Where there is a risk that the Report Recipient (as selected by virtue of their delegated functions) may be conflicted, i.e. they are a person concerned within the report, an alternative suitable Report Recipient will be selected by the Designated Person.

- Where information provided identified as part of the screening assessment does not show prima facie evidence of the occurrence of a relevant wrongdoing, the reporting person shall be notified in writing of the decision to close the process and the reasons for it, as soon as practicable.

Appendix 1 of this document sets out IFI's procedure for the receipt of, processing and follow up on protected disclosures.

[4] Report Recipients shall be selected on the basis of their delegated functions as a Head of Function.

Making a Protected Disclosure Outside IFI – External Reporting Channels

IFI encourages workers to make protected disclosures through its internal reporting channel 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 out 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 Climate, Energy and the Environment (DCEE), 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 report of substantially the same information to their employer or other responsible person; or to a prescribed person; or the Protected Disclosures Commissioner; or to a relevant Minister but no feedback has been provided to the worker in response to the report within the specified feedback period, 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; or

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@dcee.gov.ie

ii) by post: **marked confidential** to Minister or Minister of State of the Department of Climate, Energy and the Environment, c/o Protected Disclosures Team, ICG Section, Department of Climate, Energy and the Environment, Elm House, Earlsvale Road, Cavan H12 A8H7

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'[5] 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

[5] **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.

disclosed by the legal adviser.

1.21 Making a Protected Disclosure in other cases

1.21.1 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: 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:

a) there is a risk of penalisation; or

b) 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 this 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 ~~is~~ **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 IFI, 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 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 – Section 22

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 relating to confidential reports received by IFI will be retained for 7 years. After this period elapses, all records relating to the report (correspondence, screening assessment, records in relation to investigations etc.) will be securely disposed of. The reports relating to these disclosures will retain high level anonymised information for statistical purposes.

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 Citizens 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 channel 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. Initial (screening) Assessment of the disclosure

2.1. IFI's appointed independent 3rd party (will complete an initial **assessment (screening)** of the information provided in a reporting person's disclosure. In order to do so, the appointed independent 3rd party 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 IFI's appointed independent 3rd party. 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 the appointed independent 3rd party.

2.6. IFI's appointed independent 3rd party 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 a Report Recipient will be selected on the basis of their delegated functions. The Report Recipient will decide on the 'appropriate action' to 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 IFI's appointed independent 3rd party, 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 Report Recipient forms the view that a full investigation is warranted, the IFI's Designated Person 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 IFI's appointed independent 3rd party, 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. IFI's appointed independent 3rd party. 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 IFI's appointed independent 3rd party. regarding the screening assessment, they will document their rationale, inform IFI's appointed independent 3rd party., and the Reporting Person shall be informed, and the matter will be closed.

3.4. Where the IFI Designated Person varies the finding of IFI's appointed independent 3rd party 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 Report Recipient considers that an investigation is warranted, an investigation will commence as soon as practicable. Terms of Reference for the investigation will be drafted and agreed.

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.

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 the Report Recipient 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 who is the subject 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 [6].

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 IFI's appointed independent 3rd party or Designated Person, 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

[6] SPECTRUM LIFE Contact details here, 01 518 0356

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 www.fisheriesireland.ie

Internal Reporting Channel link

whistleblowersoftware.com/secure/ifi

Internal Reporting Channel QR code

Appendix 3 – 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,. This independent 3rd party 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]

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.

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

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.

[IFI's appointed independent 3rd party] 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 IFI's appointed independent 3rd party, you need to provide us with your contact information. If you decide to disclose your identity, your identity will only be known by IFI's appointed independent 3rd party. Your anonymity will be safeguarded 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.

Designated impartial persons and Report Recipients within Inland Fisheries Ireland that are 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 IFIs independent 3rd party or IFI can contact you. It is recommended that you do this as it can often be difficult for IFI 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 IFI 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 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

Upload file

Submit