

## Protected Disclosures Policy

### What is a Protected Disclosure?

“A protected disclosure means disclosure of relevant information, which in the reasonable belief of the worker, tends to show one or more relevant wrongdoings and which came to the attention of the worker in connection with his/her employment”.

In making a disclosure a worker must reasonably believe the information disclosed to be substantially true. No worker will be penalised simply by getting it wrong so long as the worker had a reasonable belief that the information disclosed shows, or tends to show, wrongdoing.

### The Protected Disclosures (Whistle-blowers) Act 2014:

The above Act came into effect on the 16th of July 2014. Schools are required to put a Protected Disclosure policy in place which meets the requirements of the Act. The Board of Management of Enable Ireland Sandymount School takes the issue of wrongdoing seriously and as a result has drafted this policy.

### Definitions under the Protected Disclosures Act, 2014

#### *Protected Disclosure*

A Protected Disclosure is defined in the Protected Disclosures Act, 2014 as a disclosure of relevant information which, in the reasonable belief of the worker, tends to show one or more ‘relevant wrongdoings’, which came to the attention of the worker in connection with the worker’s employment and is disclosed in the manner prescribed in the Protected Disclosures Act, 2014.

For the purposes of this Act information is “relevant information” if;

- a) in the reasonable belief of the worker, it tends to show one or more relevant wrongdoings, and
- b) it came to the attention of the worker in connection with the worker’s employment.

#### *The following matters are relevant wrongdoings;*

- a. that an offence has been, is being or is 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 whereby the worker undertakes to do or perform personally any work or services,
- c. that a miscarriage of justice has occurred, is occurring or is likely to occur,
- d. that the health and/or safety of any 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 an unlawful or otherwise improper use of funds or resources of a public body, or of other public money, has occurred, is occurring or is likely to occur,
- g. that an act or omission by or on behalf of a public body is oppressive, discriminatory or grossly negligent or constitutes gross mismanagement, or
- h. that information tending to show any matter falling within any of the preceding paragraphs has been, is being or is likely to be concealed or destroyed.



A 'protected disclosure' under this policy may be about a relevant wrongdoing;

- a) that is occurring now;
- b) that happened in the past;
- c) that may happen in the future.

*Section 5(5) of the Protected Disclosures Act provides as follows:*

A matter is not a relevant wrongdoing if it is a matter which 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.

*Difference between Grievance and Protected Disclosure;*

It is important to distinguish between a protected disclosure and a grievance.

A grievance is a matter specific to the employee/worker i.e. duties, terms and conditions of employment, working procedures or working conditions.

*Aims of the Policy*

- To encourage staff to feel confident and safe in raising concerns and disclosing information;
- To provide avenues for staff to raise concerns in confidence and receive feedback on any action taken;
- To ensure that staff receive a response where possible to their concerns and information disclosed;
- To reassure staff that they will be protected from penalisation or any threat of penalisation.

*What are "Relevant Wrongdoings"?*

Relevant Wrongdoings include but are not limited to the following:

- The commission of an offence.
- Non-compliance with a legal obligation
- Danger to Health & Safety of an individual.
- Improper use of public funds.

The relevant wrongdoings may already have taken place, be happening or be likely to happen.

*Who is a worker as far as a school is concerned?*

- All current and former employees (including permanent, temporary, fixed-term, casual and substitute);
- Contractors and consultants engaged to carry out work or services for the school;
- Agency workers;
- Individuals on work experience pursuant to a training course and trainees of/with the school.

*To whom do you make the Disclosure?*

The vast majority of disclosures should be made, orally or in writing, to the school Principal or to the Chairperson of the Board of Management (BOM). Where this is inappropriate or impossible there is provided a list of "Prescribed Persons". In relation to schools, the Prescribed Person is the Secretary General of the Department of Education (DE).



### *What protections are available to disclosers/whistle blowers*

Among the protections are:

- Protection from dismissal.
- Up to 5 years' remuneration for unfair dismissal.
- Protection of identity (subject to certain exceptions)
- Protection from penalisation by the school Board of Management.

### Safeguards and Penalisation

A worker who makes a disclosure and has a reasonable belief of wrongdoing will not be penalised by the school, even if the concerns or disclosure turn out to be unfounded.

Penalisation includes suspension/dismissal, disciplinary action, demotion, discrimination, threats or other unfavourable treatment arising from raising a concern or making a disclosure on the basis of reasonable belief for doing so. If a staff member believes that he/she is being subjected to penalisation as a result of making a disclosure under this procedure, he/she should inform the Principal or Chairperson of the Board of Management immediately.

Staff members who penalise or retaliate against those who have raised concerns under this policy will be subject to disciplinary action.

Staff members are not expected to prove the truth of an allegation. However, they must have a reasonable belief that there are grounds for their concern. It should be noted that appropriate disciplinary action may be taken against any staff member who is found to have raised a concern or raised a disclosure with malicious intent.

### Procedure for Making a Disclosure

An employee/worker must make a disclosure in the manner set out in the 2014 Act to gain the protections of the Act. Any employee/worker who has a reasonable belief in relation to one or more of the relevant wrongdoings should disclose the information directly to the school Principal or to the Chairperson of the Board of Management (BOM). Where this is inappropriate or impossible there is provided a list of "Prescribed Persons". In relation to schools the Prescribed Person is the Secretary General of the Department of Education (DE). The disclosure under this policy should be made in writing or verbally. In the event of a verbal disclosure, the disclosure shall be recorded and signed by the discloser as an accurate record of their disclosure. A standard form for making a Disclosure is attached in Appendix I. The discloser should communicate all relevant information relating to the concern. This will facilitate the assessment as to whether the disclosure warrants investigation. The specific nature of the potential wrongdoing should be communicated at the time the disclosure is made along with the date of the disclosure and stating whether the disclosure is made under the Protected Disclosures Act 2014 and if the discloser expects confidentiality/does not expect confidentiality. A disclosure should contain 'information' which tends to show wrongdoing. The ordinary meaning of disclosing 'information' is conveying facts, such as stating that particular events have occurred. This is different to simply making an allegation on the basis of a suspicion that is not founded on anything tangible. While a disclosure may be made anonymously, it should be noted that the extent to which this policy can be applied and implemented is significantly restricted in the case of anonymous disclosures. Note that employees/workers cannot obtain redress under the 2014 Protected Disclosures Act while remaining anonymous. An employee/worker intending to raise a concern should not carry out an investigation outside of the normal scope of his/her duties with a view to seeking to confirm relevant wrongdoing. Employees/Workers considering making an



internal disclosure should not endeavour to find proof of their concern/suspicion or delay making the disclosure in order to gather evidence to support the disclosure first.

#### *What is best practice?*

If a member of staff has a genuine or reasonable concern that there is wrongdoing in the school you should report it to the Principal. Staff can also/instead fill the Protected Disclosures Reporting Form (Appendix 1). If this is not appropriate or possible you should then report it to the Chairperson of the BOM. Workplace grievances should be reported in the normal manner and are not covered by this policy. It should be noted that while internal reporting is encouraged you have the option to raise concerns outside of the school's Board of Management and report to the Secretary General of the Department of Education.

#### *Information to be included in the making of a disclosure*

The disclosure should, at minimum, include the following details:

- The discloser's name, area of work and contact details (optional as disclosure can be anonymous);
- the date of the alleged wrongdoing (if known) or the date the alleged wrongdoing commenced or was identified;
- whether or not the alleged wrongdoing is still ongoing;
- whether the alleged wrongdoing has already been disclosed to any member of management and if so when and to what effect;
- the details of the alleged wrongdoing and any supporting information;
- the name of the person(s) (if known or applicable) allegedly involved in the alleged wrongdoing;
- any other relevant information

#### *Procedure for Receiving a Disclosure*

The school Principal or the Chairperson of the Board of Management (BOM) receive disclosures and any other individual to whom the disclosure is referred in the performance of that employee's/person's duties, must take all reasonable steps to avoid disclosing to another person any information that might identify the person by whom the disclosure was made. If a disclosure is made to another individual in the course of their duties, this individual is required to request the discloser to make the disclosure directly to the school Principal or to the Chairperson of the Board of Management (BOM). Upon receiving a disclosure the school Principal or the Chairperson of the Board of Management should undertake an initial screening/assessment process (see section 15.1 DoPER Guidance under section 21(1) of the Protected Disclosures Act 2014 for the purpose of assisting public bodies in the performance of their duties under the Act) following which he/she will advise the discloser as to whether the matter requires an investigation in accordance with the Protected Disclosures Act, 2014. The screening process should involve an assessment of the disclosure to seek to determine whether or not it should be treated as a protected disclosure, having regard to the 2014 Act. If it is unclear whether the disclosure qualifies as a protected disclosure, the school Principal or the Chairperson of the Board of Management (BOM) should treat the disclosure as a protected disclosure (and protect the identity of the discloser in accordance with the procedures). 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. If, having assessed the disclosure, there is a mix of different issues (some involving a protected



disclosure, some involving a personal employment complaint) then an appropriate process/processes should be applied to deal with the issues. The process to be applied may differ from case to case. The screening/assessment process should consider whether the alleged wrongdoing is something that can or should be investigated or not (see Procedure for Investigation of a Disclosure). If an investigation is required, the school Principal or the Chairperson of the Board of Management should consider the nature and extent of the investigation. In the event that the school Principal or the Chairperson of the Board of Management is of the view that any further investigation is not required, they should advise the discloser of his/her assessment and the basis for the assessment, insofar as is possible. As it is not possible to know at the time, whether a disclosure will subsequently be deemed protected under the Protected Disclosures Act, the school Principal or the Chairperson of the Board of Management should keep a written record of his/her actions, including timelines, under this section.

Employees/Workers should be advised by the school Principal or the Chairperson of the Board of Management that the following conditions must apply to an employee/worker's disclosure:

- It must have come to their attention in connection with their employment;  
and
- they must have a reasonable belief that the information disclosed tends to show a wrongdoing.

That a disclosure of any wrongdoing which is the employee/worker's or the employee/worker employers' function to detect, investigate or prosecute does not come within the terms, or attract the protections and redress of the 2014 Act (unless it involves an act or omission on the part of the employer). Employees/Workers should be advised that they will not be penalised or caused to suffer detriment for making a report of possible wrongdoing which subsequently turns out to be incorrect provided the employee/worker had a 'reasonable belief' that the information being reported showed or tended to show one or more of the relevant wrongdoings.

#### *Feedback*

Employees/Workers making protected disclosures will be advised that he/she will be provided with periodic feedback by the school Principal or to the Chairperson of the Board of Management, in confidence, in relation to the matters disclosed and be advised when consideration of the disclosure is complete, except in exceptional cases; this may take the form of reassurance and affirmation that the matter is receiving attention. Note that this does not require the School to give a complete account of what the situation is at a particular point in time in terms of progress (see section 18 DoPER Guidance under section 21(1) of the Protected Disclosures Act 2014 for the purpose of assisting public bodies in the performance of their duties under the Act).

#### *Confidentiality*

Enable Ireland Sandymount School is committed to protecting the identity of the person making a protected disclosure and ensuring that protected disclosures are treated in confidence. However, there are circumstances, as outlined in the 2014 Act, where confidentiality cannot be maintained, for example, where the discloser/whistle-blower makes it clear that he/she has no objection to his or her identity being disclosed and/or the identity of the discloser/whistle-blower is critical to an investigation of the matter raised. If it is decided that confidentiality cannot be maintained in the context of an investigation, the school will inform the person in advance that his/her identity will be disclosed.



The Protected Disclosures Act, 2014 provides that a person to whom a Protected Disclosure is made, and any person to whom a Protected Disclosure is referred in the performance of that person's duties, shall not disclose to another person any information that might identify the person by whom the Protected Disclosure was made, except where:

- the person to whom the Protected Disclosure was made or referred shows that he or she took all reasonable steps to avoid so disclosing any such information;
- the person to whom the Protected Disclosure was made or referred reasonably believes that the person by whom the Protected Disclosure was made does not object to the disclosure of any such information and to their identity being disclosed;
- the person to whom the Protected Disclosure was made or referred reasonably believes that disclosing any such information is necessary for;
  - a) The effective investigation of the relevant wrongdoing concerned,
  - b) The prevention of serious risk to the security of the State, public health, public safety or the environment, OR
  - c) The prevention of crime or prosecution of a criminal offence; OR
  - d) Where the disclosure is otherwise necessary in the public interest or is required by law.

Employee/worker(s) who are concerned that their identity is not being protected should notify the school Principal or the Chairperson of the Board of Management, they will assess/investigate such notifications and take appropriate action where necessary. Where it becomes clear that the confidentiality of the discloser cannot be ensured, the discloser will be advised and procedures and active strategies put in place for supporting the discloser.

### Procedure for Protection of Identity

Where action is to be taken following a protected disclosure, a process will be put in place for consulting with the discloser and, where possible, for gaining the informed consent of the discloser prior to any action being taken that could identify them. This may include when disclosures are being referred by the school to an external party. Where it is decided that it is necessary to disclose information that may or will reveal the identity of the discloser, the discloser should be informed of this decision in advance of the disclosure, except in exceptional cases. The discloser should also be informed of the review process, which may be invoked by the discloser in respect of this decision.

Procedure for Communicating with any employee/worker against whom an Allegation of Wrongdoing has been made.

An employee/worker(s) against whom an allegation of wrongdoing has been made and the disclosure has been recorded and assessed as to warranting investigation by a named individual in order to establish the facts, will be advised, formally, of the following in writing:

- a) that an allegation has been made against them;
- b) that no conclusions will be drawn by the School until the facts have been investigated;
- c) that they are expected to assist the investigator as far as is reasonably possible;
- d) that the investigator wishes to interview them at a specific time and place;
- e) that they may have a person of their choice present at the interview (i.e. union representative, a colleague, a peer support from their workplace, etc.);
- f) they have the right to make a statement in respect of the allegation(s) made against them either orally and/or in writing;
- g) as far as is reasonably possible, their confidentiality and privacy will be respected;



h) that the following support and advice is available.

### Procedure for Investigation of a Disclosure

Where the school Principal or the Chairperson of the Board of Management forms the view that an investigation is required the matter should be examined and/or investigation or to an external person, at the school's discretion. An investigation may consist of an informal approach for less serious wrongdoings, a detailed and extensive investigation of serious wrongdoings, or an external investigation by another body. It is important to note that some matters may be of such seriousness that the investigation may have to be carried out externally, such as by subject matter experts or may need to be reported to and investigated by An Garda Síochána or another body with the statutory power and function of investigation of particular matters. Investigations carried out will be impartial and conducted in a manner fully consistent with due process and the procedures will commit to this standard. In addition, the confidentiality of both the employee/worker making the report of possible wrongdoing and the person against whom the allegation of wrongdoing has been made will be protected – in the former case in accordance with the relevant legal provisions in the case of a protected disclosure and in the latter consistent with the principles of natural justice. The discloser will be provided with feedback from the school Principal or the Chairperson of the Board of Management concerning general information in relation to the matters disclosed and be advised when consideration of the disclosure is complete. As it is not possible to know at the time whether the disclosure will subsequently be deemed protected under the Protected Disclosures Act, written records, including timelines, in relation to any investigation undertaken, under this Policy should be maintained.

### Screening/ assessment process

The Person to receive a disclosure should undertake an initial screening/assessment process (see section 15.1 DoPER Guidance under section 21(1) of 10 | Page the Protected Disclosures Act 2014 for the purpose of assisting public bodies in the performance of their duties under the Act) following which he/she will advise the discloser as to whether the matter requires an investigation in accordance with the Protected Disclosures Act, 2014. The screening process should involve an assessment of the disclosure to seek to determine whether or not it should be treated as a protected disclosure, having regard to the 2014 Act. If it is unclear whether the disclosure qualifies as a protected disclosure, the Chairperson of the Board of Management/ School Principal should treat the disclosure as a protected disclosure (and protect the identity of the discloser in accordance with the procedures). 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. If, having assessed the disclosure, there is a mix of different issues (some involving a protected disclosure, some involving a personal employment complaint) then an appropriate process/processes should be applied to deal with the issues. The process to be applied may differ from case to case. The screening/assessment process should consider whether the alleged wrongdoing is something that can or should be investigated or not (see section 21; Procedure for Investigation of a Disclosure). If an investigation is required, the appropriate Assistant Chief Executive should consider the nature and extent of the investigation. In the event that the Designated Officer is of the view that any further investigation is not required, the Designated Officer should advise the discloser of his/her assessment and the basis for the assessment, insofar as is possible. As it is not possible to know at the time, whether a disclosure will subsequently be



deemed protected under the Protected Disclosures Act, the Designated Officer should keep a written record of his/her actions, including timelines, under this section. (Appendix 3).

### Internal Disclosures - Disclosures to the school

This procedure identifies how a member of staff can make a protected disclosure within the school. Within the School, protected disclosures should normally be made in the first instance to School Principal.

If an individual feels unable to raise the matter with the School Principal, the protected disclosure may be raised with other responsible person, a prescribed person who will have received dedicated training in how to handle protected disclosures, a Minister of the Government or a legal adviser. (page 8, Raising a concern Externally, point a), b) c) & d)).

### Review

A system of review is available in respect of the following:

- a) Any decision made to disclose the identity of the discloser (except in exceptional cases);
- b) The outcome of any assessment/investigation undertaken in respect of the protected disclosure; and
- c) The outcome of any assessment/investigation in respect of any complaint of penalisation.

Any review will be conducted by a person delegated by the Board of Management. Where a decision is taken to disclose the identity of the discloser, where possible, the discloser will be offered a review before their identity is disclosed. Note that there is no entitlement to two reviews of the same issue. A specific process will be drawn up for handling the review which requires that parties not involved in the original process re-evaluate the findings and consider any additional evidence provided. The outcome of the review will then be communicated to the employee/worker.

### Raising a Concern Externally

Employee/worker(s) are encouraged to raise their concerns under the school's internal disclosure procedure in the first instance. However, it is recognised that this may not always be appropriate therefore the Protected Disclosure Act 2014 provides for external reporting to persons other than the School in certain circumstances. The 2014 Act allows a worker to make a protected disclosure to persons other than their employer in certain circumstances. It is preferable in most circumstances to disclose to the school and, only if that is not appropriate, to use one of the options at (a) to (d) below. There are stringent requirements for alternative external disclosures to qualify as protected disclosures under the 2014 Act. Different requirements need to be met in different cases. Information in relation to the options available for external reporting and the requirements of each option are set out in the Protected Disclosures Act of 2014

<http://www.irishstatutebook.ie/eli/2014/act/14/enacted/en/html>

and summarised below;

- a) Other responsible person

Where the employee/worker reasonably believes that the wrongdoing relates to the conduct of a person other than the worker's employer, or to something for which that other person has legal responsibility, then the worker can disclose to that other person.



b) A prescribed person

Certain persons are prescribed by Statutory Instrument 339 of 2014 (“SI 339”) to receive protected disclosures (“prescribed persons”). This includes the heads or senior officials of a range of statutory bodies including the Chief Executives of Local Authorities. An employee/worker may make a protected disclosure to a prescribed person if the worker reasonably believes that the relevant wrongdoing falls within the description of matters in respect of which the person is prescribed under SI 339. However, the 2014 Act also provides an additional requirement in this case. The employee/worker must believe that the information disclosed, and any allegation contained in it, are substantially true.

c) A Minister of the Government

If an employee/worker is or was employed in the School, the worker may make a protected disclosure to the Minister for Housing, Planning, Community and Local Government.

d) A legal adviser

The 2014 Act allows a protected disclosure to be made by an employee/worker in the course of obtaining legal advice from a barrister, solicitor, trade union official or official of an excepted body (an excepted 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).

### Complaints Procedure

A complaint of penalisation or for a breach of confidentiality under this policy can be made under separate procedures. Any such acts of penalisation or attempted penalisation may be treated as a disciplinary matter. Breach of confidentiality by the recipient of a disclosure, or the person to whom the disclosure is referred, to disclose the discloser’s identity or information that may identify the discloser unless there is a good reason for doing so, may be treated as a disciplinary matter, in line with the school’s Disciplinary Policy.

### Communication, Monitoring and Review

This policy will be communicated to staff and the school community as appropriate and will be subjected to regular review. In accordance with the systematic cycle of review of policies adopted in Enable Ireland Sandymount School, it will be reviewed initially after one year and then every three years, unless there is a compelling reason to review it earlier.



### Review and Ratification

This policy was reviewed and ratified by the Board of Management.

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This policy was reviewed and ratified by the Board of Management.

Signed:



Sé Goulding, Chairperson of Board of Management



Jennifer Doyle, Principal

Date: 4 July 2025



## Appendix 1

### Protected Disclosures Reporting Form

Enable Ireland Sandymount School welcomes the reporting of disclosures under the Protected Disclosure Policy.

The Protected Disclosure Policy is part of Enable Ireland Sandymount School's approach to good governance as it seeks to deter, prevent and detect fraud and other significant wrongdoings.

Before completing this form, you should:

- Consider whether the Protected Disclosures Policy is the appropriate policy under which to report your concern.
- Ensure that the report is being made in relation to a matter that you have reasonable grounds to be concerned about.

Reports should be submitted to an appropriate person as outlined in Enable Ireland Sandymount School's Protective Disclosures Policy.

Name of Worker reporting the concern: <i>(Anonymous reports will be considered but not encouraged)</i>	
Confidential contact number:	
Email Address:	
Details of alleged wrongdoing including dates, if applicable: <i>(Care should be taken to only include the name(s) of individual(s) directly relevant to the report)</i>	
Has the alleged wrongdoing being reported previously: <i>(if so please specify when and to whom)</i>	
Date:	
Signature:	



## Appendix 2

### Investigation of a disclosure – checklist

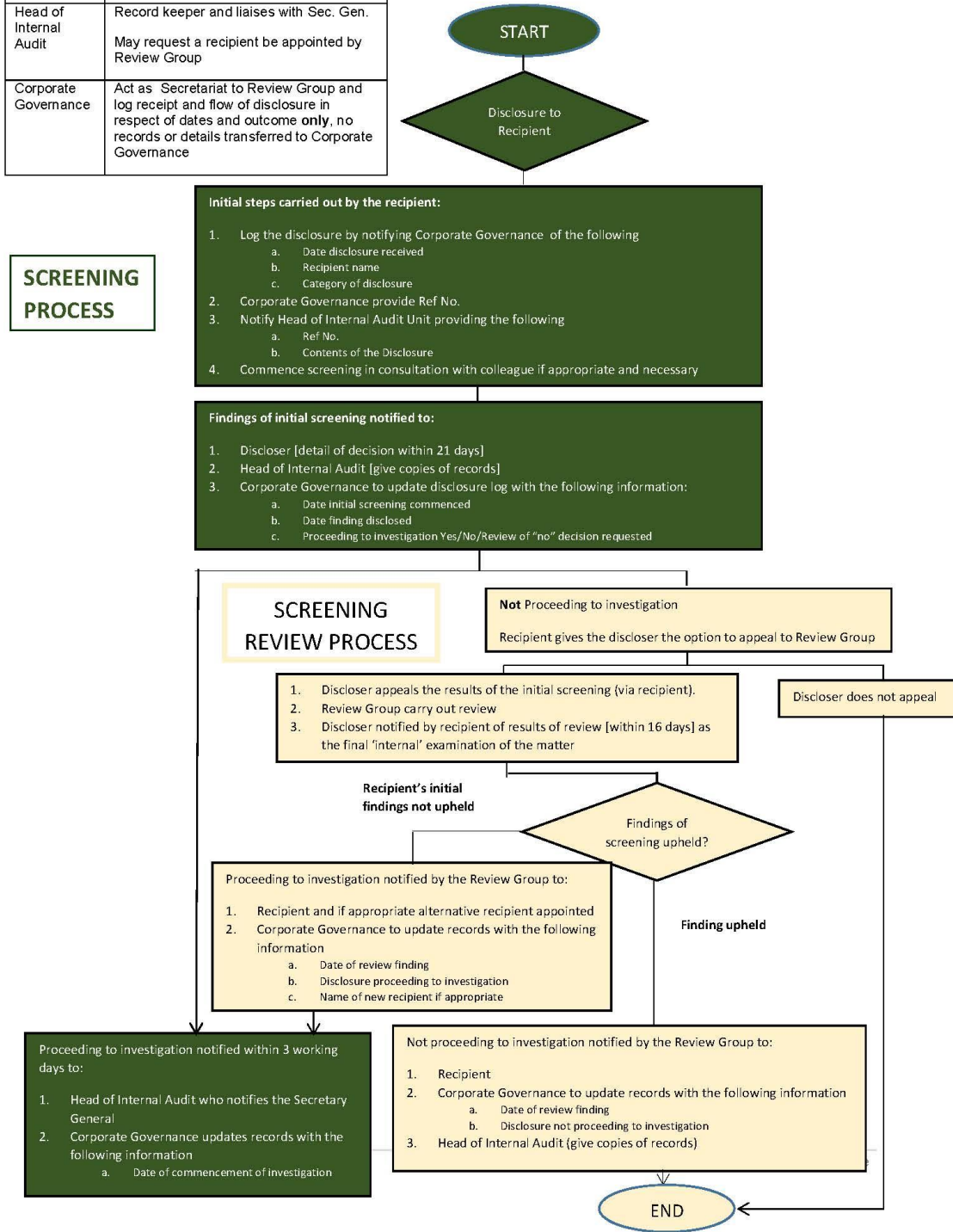
1. Has the investigator read and familiarised themselves with the content of Enable Ireland Sandymount School's Protected Disclosure policy?	
2. Has the investigator familiarised his or herself with the procedures for conducting an investigation, taking account of the principles of natural justice?	
3. Has particular note been taken of their responsibilities regarding the avoidance of the disclosure of information that might identify the person by whom the disclosure was made?	
4. Has particular note been taken of their responsibilities regarding the avoidance of the disclosure of information that might identify the person by whom the disclosure was made?	
5. Has the investigator meet with the discloser and advised them that their concerns will be taken seriously?	
6. Has it been confirmed with the discloser that he or she has read the most up to date version of Enable Ireland Sandymount School's policy on Protected Disclosures?	
7. Has it been confirmed that the school Principal or to the Chairperson of the Board of Management: <ul style="list-style-type: none"> <li>• Has had receipt of the disclosure,</li> <li>• Is aware of the nature of the information contained therein,</li> <li>• Is aware of the outcome of the preliminary evaluation and that the matter has been referred to investigator for investigation</li> </ul>	
8. Has the Discloser been advised: <ul style="list-style-type: none"> <li>• Who is carrying out the investigation?</li> <li>• That they will be kept updated of the progress of the investigation as appropriate?</li> <li>• Will be advised of the outcome when the investigation is completed?</li> </ul>	
9. Have the limits of confidentiality as set out in the Protected Disclosure legislation been explained to the Discloser?	
10. Where it is decided that it is necessary to disclose information that may or will disclose the identity of the discloser, has the Discloser been informed of this decision?	
11. Has the Discloser been advised of the outcome of the investigation and the reasons for this decision explained as far as possible?	
12. Has the Discloser been advised that they have the right to seek a review of any decisions made?	
13. Where the investigation has concluded that in making a disclosure, the discloser did not have a reasonable belief in the wrong doing, has the matter been referred to the school Principal or to the Chairperson of the Board of Management for consideration?	



Appendix 3

Participant	Role
Discloser	Person making the disclosure
Recipient	Person handling the disclosure usually a PO/PO equivalent/Asst. Secretary
Review Group	An Assistant Secretary and a senior Legal Services Officer
Head of Internal Audit	Record keeper and liaises with Sec. Gen. May request a recipient be appointed by Review Group
Corporate Governance	Act as Secretariat to Review Group and log receipt and flow of disclosure in respect of dates and outcome <b>only</b> , no records or details transferred to Corporate Governance

**PROTECTED DISCLOSURE**  
**Handling of Internal Disclosure**



Participant	Role
Discloser	Person making the disclosure
Recipient	Person handling the disclosure usually a PO/PO equivalent/Asst. Secretary
Review Group	An Assistant Secretary and a senior Legal Services Officer
Head of Internal Audit	Record keeper and liaises with Sec. Gen.
Corporate Governance	Act as Secretariat to Review Group and log receipt and flow of disclosure in respect of dates and outcome <b>only</b> , no records or details transferred to corporate governance

## PROTECTED DISCLOSURE Handling of Investigation

