

Dublin City Council



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

Policy and Procedure on Protected Disclosures

**External Reporting to
Chief Executive of Dublin City Council
as a prescribed person under SI 367 of 2020**

January 2023

This Guidance does not constitute legal advice, or a legal interpretation of the Protected Disclosures Act 2014 (as amended).

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Section 1: Overview

The Protected Disclosures Act 2014 as amended by the Protected Disclosures (Amendment) Act 2022, protects workers in the public, private and not-for-profit sectors if they speak up about or raise concerns relating to wrongdoing in the workplace. Workers can report wrongdoing internally to their employer or externally to a third party, such as a prescribed person.

Specifically, the key objectives of the legislation are as follows:

- To encourage workers to raise reasonable concerns regarding possible wrongdoing in the workplace so that these concerns can be addressed.
- To underpin a working environment in which the primary focus is on responding to the “message” (i.e., the report of wrongdoing) rather than on the “messenger” (i.e. the worker making the report).
- To reinforce the legal requirement that employers should not penalise a worker who makes a protected disclosure.
- To ensure that a competent and timely assessment and investigation of reports of wrongdoing takes place followed, where necessary, by an appropriate response.

1. Introduction

Prescribed persons are designated, under section 7 of the 2014 Act and SI 367/2020, to receive disclosures from workers of relevant wrongdoings that fall within their sphere of activity. By Statutory Instrument 367 of 2020 the Minister for Public Expenditure and Reform prescribed the Chief Executive of a Local Authority for all matters relating to that local authorities’ functions under the Local Government Acts 1925 to 2019 or under any other legislation. To make a disclosure under Section 7 of the Act a worker must reasonably believe that the relevant wrongdoing falls within the description of matters in respect of which the Chief Executive of a Local Authority is prescribed, and that the information disclosed, and any allegation contained in it, are substantially true. The full list of prescribed persons is available at <https://www.gov.ie/en/collection/41798-protected-disclosures-whistleblowing-list-of-prescribed-persons/?referrer=http://www.gov.ie/prescribed-persons/>.

Reports can also be transmitted between prescribed persons or referred to prescribed persons by the Protected Disclosures Commissioner.

Dublin City Council has a separate procedure for workers to make an internal report. Whilst reporting persons within an organisation are encouraged to make use of internal channels in place to receive protected disclosures there is no obligation on them to do so. Higher standards are applicable if the reporting person makes a report through an external channel as they must believe the relevant wrongdoing is ‘substantially true’.

This procedure outlines the process for making a protected disclosure on wrongdoing, as defined in the protected disclosures legislation, to the Chief Executive, Dublin City Council, as a prescribed person, using external reporting channels and to give effect to the obligations and provisions of the Protected Disclosures Act 2014, as amended by the Protected Disclosures (Amendment) Act 2022.

2. Definition of a Protected Disclosure

A Protected Disclosure is defined in the legislation as a disclosure of information which, in the reasonable belief of the worker, tends to show one or more ‘relevant wrongdoings’, which come to the attention of the worker in a work-related context. This means current or past work activities in the public or private sector through which, irrespective of the nature of these activities, the reporting person acquires information concerning a relevant wrongdoing, and within which the reporting person could suffer penalisation for reporting the information and is disclosed in the manner prescribed in the Act.

The following matters are relevant wrongdoings and may relate to matters that are occurring now, have happened in the past or may happen in the future:

- 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 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 a breach of specified EU law set out in the Directive has occurred, is occurring or is likely to occur; or
- i. that information tending to show any [of the above] 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.

A reporting person may make a protected disclosure to a prescribed person if the reporting person reasonably believes that the relevant wrongdoing falls within the description of matters in respect of which the prescribed person is prescribed. However, the Act also provides an additional requirement in this case, in that the reporting person must reasonably believe that the information disclosed, and any allegation contained in it, are substantially true.

The Policy does not cover personal complaints or personal grievances. For example, complaints around a dispute between a worker and a manager concerning their duties or work practices should generally be dealt with under the grievance procedure. Claims by a worker that they are being bullied or harassed by a colleague should generally be dealt with under the Dignity at Work procedure. The policy does not cover a disclosure where the worker knowingly conveys false, misleading, frivolous, or vexatious information. If it transpires that a worker makes a disclosure, which they know to be false or do not believe to be true, Dublin City Council reserves the right to take disciplinary or other appropriate action. In addition, persons knowingly reporting information that is false are liable to prosecution under Section 14A of the Act.

3. Definition of Worker

For the purposes of the Act, a worker means an individual who has acquired information on a relevant wrongdoing in a work-related context and includes the following:

- a) an individual who is or was a worker,
- b) an individual who entered into or works or worked under any other contract, whether express or implied and (if it is express) whether oral or in writing, whereby the individual undertook to do or perform (whether personally or otherwise) any work or services for another party to the contract for the purposes of that party's business,
- c) an individual who works or worked for a person in circumstances in which
 - i. the individual is introduced or supplied to do the work by a third person, and
 - ii. the terms on which the individual is engaged to do the work are or were in practice substantially determined not by the individual but by the person for whom the individual works or worked, by the third person or by both of them,
- d) an individual who is or was provided with work experience pursuant to a training course or programme or with training for employment (or with both) otherwise than under a contract of employment,
- e) an individual who is or was a shareholder of an undertaking,
- f) an individual who is or was a member of the administrative, management or supervisory body of an undertaking, including non-executive members. **This includes elected members of city/county councils** who are now included in the scope of the Act by virtue of this provision.
- g) an individual who is or was a volunteer,
- h) an individual who acquires information on a relevant wrongdoing during a recruitment process, and
- i) an individual who acquires information on a relevant wrongdoing during pre-contractual negotiations (other than a recruitment process referred to in (h) above).

A worker who makes a protected disclosure is described as a reporting person.

4. Reports from non-workers or the general public

In order for a report to qualify as a protected disclosure, it must be made by a worker. Reports that do not fulfil these criteria are not protected disclosures and do not need to be dealt with in the manner specified by the Act. This does not mean that such reports should be ignored – it is in the public interest that credible reports of wrongdoing should be followed-up on regardless of the source of such information. Such follow-up may be carried out in accordance with other procedures the body may have for addressing such matters (e.g., a customer complaints process) or other policies or procedures. If there is any uncertainty or doubt as to whether the reporting person is a worker, it is advised that their report be treated as a protected disclosure until the position can be clarified.

5. Reasonable Belief

A reporting person may make a protected disclosure to a prescribed person if the reporting person reasonably believes that the relevant wrongdoing falls within the matters for which the prescribed person is prescribed.

The following conditions must apply to a disclosure to the prescribed person:

- It must have come to the reporting person's attention in a work-related context.
- They must have a reasonable belief that the information disclosed shows a relevant wrongdoing.
- They must have a reasonable belief that the information disclosed, and any allegation contained in it, are substantially true.

No reporting person will be penalised for submitting a protected disclosure if it is subsequently established that they were mistaken in their belief that wrongdoing was occurring provided that that they had a reasonable belief that the information that was disclosed showed or tended to show wrongdoing.

However, a report made in the absence of a reasonable belief will not attract the protection of the legislation and may result in disciplinary action against the reporting person who made the protected disclosure. In addition, disclosure of a wrongdoing does not necessarily confer any protection or immunity on a reporting person in relation to any involvement they may have had in the wrongdoing.

6. Protections under the Act

The legislation provides for certain protections for those submitting protected disclosures. These include protections against penalisation and keeping their identity confidential, with certain exceptions. Penalisation and the breaching of confidentiality is a criminal offence.

Examples of penalisation include but are not limited to the following:

- 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.

7. Protections from dismissal/penalisation

A reporting person who has a reasonable belief in relation to a serious wrongdoing in connection with their employment and discloses that concern will not be penalised for the making of that disclosure, even if (a) no investigation subsequently takes place, or (b) where an investigation does take place, the investigation finds that no wrongdoing occurred. This undertaking extends to any other worker/worker who is required to provide information in relation to matters raised as a consequence of their disclosure.

8. Claims of Penalisation

Claims of penalisation by reporting persons who submit protected disclosures will be dealt with by the HR Department of the reporting person. In addition, external remedies open to reporting persons who believe that they have been penalised include a claim before the Workplace Relations Commission (within 6 months of the penalisation) and the Circuit Court (within 21 days of the last instance of penalisation).

9. Confidentiality

The designated officer who is assigned to receive a reporting person's disclosure under this policy and any other worker to whom the disclosure is referred in the performance of that workers/person's duties, must take all reasonable steps to avoid disclosing to another person any information that might identify a reporting person who has made a protected disclosure.

The following exceptions apply:

- The person to whom the disclosure was made or transmitted shows that they took all reasonable steps to avoid such disclosure.
- The person to whom the disclosure was made or transmitted had 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.
- Where the disclosure is otherwise required by law.
- Where the disclosure is a necessary and proportionate obligation imposed by legal principles or the law of the State in the context of investigations or judicial proceedings, including with a view to safeguarding the rights of defence of the person concerned.

In the circumstances detailed above, the worker will be informed if it becomes clear that it is not possible to maintain their confidentiality unless the notification would jeopardise:

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

10. Protection of the rights of the person against whom an allegation of wrongdoing has been made

The principles of natural justice and fair procedures will be complied with as appropriate, where an allegation of wrongdoing is made against a worker, and the disclosure has been recorded and assessed as to warranting investigation.

In specific terms, in such circumstances, the person against whom the allegation of wrongdoing has been made will be advised of the following in writing:

- i. that an allegation has been made against him/her (this should be made formally).
- ii. that the disclosure has been recorded and is being formally investigated by a named individual in order to establish the facts.
- iii. that no conclusions have been drawn until the facts have been investigated.
- iv. that they are expected to assist the investigator as far as is reasonably possible.
- v. that the investigator wishes to interview him/her at a specific time and place.
- vi. 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, this may also include in specific circumstances a legal representative).
- vii. they have the right to make a statement in respect of the allegation(s) made against them either orally and/or in writing.
- viii. as far as is reasonably possible, their confidentiality and privacy will be respected.

11. Disclosures made for Malicious Reasons

If a reporting person deliberately or recklessly makes a disclosure for the purpose of malice against another, it is likely to give rise to disciplinary sanction. Please also note that the disclosure of a wrongdoing does not provide a reporting person with any protection or immunity in terms of their involvement in the wrongdoing.

12. Withdrawal of Protected Disclosure

Once a protected disclosure has been made in accordance with the Act, it is not possible for a reporting person to withdraw the disclosure. Reporting persons are required under the Act to cooperate with a prescribed person, the Commissioner or a person to whom a report is transmitted to such extent as may reasonably and lawfully be required for the purposes of the Act. Where cooperation is withdrawn or the reporting person seeks to withdraw a protected disclosure, public bodies and prescribed persons are still required to comply with the provisions of the Act, to the greatest extent possible. Should the reporting person cease to cooperate with the protected disclosure process, this may make follow-up, including any investigation, more difficult.

13. Anonymous disclosures

There is a distinction between an anonymous disclosure (where identity is withheld by the reporting person) and confidential disclosures (where identity is protected by the recipient). Anonymous disclosures will be acted upon to the extent that is possible, whilst recognising that Dublin City

Council may be restricted in their ability to investigate the matter in the absence of the knowledge of the identity of the reporting person. While affording appropriate consideration to an anonymous disclosure, important elements of our procedures (e.g., keeping the reporting person informed and protecting a reporting person from penalisation) may be difficult or impossible to apply unless the reporting person discloses their identity. A reporting person cannot obtain redress under the Act without identifying themselves as part of the process of seeking redress. Where the anonymous report contains enough information to allow an initial assessment that there is prima facie evidence that a relevant wrongdoing has occurred, follow-up action will be taken by Dublin City Council to the extent that is possible from the information provided. Where it is possible to communicate with the reporting person (e.g., they have made their report via an anonymous email account), it may be possible to seek further information from the reporting person in order to make a better initial assessment or as part of further follow-up action.

14. Recording and Tracking of Disclosures

The Council is required under section 22 of the Act to provide an annual report to the Minister for Public Expenditure NDP and Reform. This must be provided by the 1st March in each year, this report to include information in respect of the preceding calendar year. The information must be provided in such a way that it does not enable the identification of reporting persons or persons concerned.

The following information must be included:

- a. the number of reports made to the public body, or prescribed person.
- b. the number of reports transmitted to the public body or prescribed person as the case may be, under sections 7, 10B, 10C and 10D.
- c. in respect of each report referred to in paragraphs (a) to (b), whether the relevant wrongdoing concerned was a breach.
- d. the number of investigations and proceedings opened by the public body or prescribed person in relation to the relevant wrongdoings concerned as a result of the reports referred to in paragraphs (a) to (b).
- e. the number of investigations and proceedings opened, in the years preceding the year in respect of which the report is being made, by the public body or prescribed person in relation to the relevant wrongdoings concerned that remain open.
- f. the number of investigations and proceedings closed by the public body or prescribed person in relation to the relevant wrongdoings concerned as a result of the reports referred to in paragraphs (a) to (b).
- g. in respect of each closed investigation or proceedings referred to in paragraph (f), the outcome of the investigation or proceedings and the decision taken by the public body or prescribed person.
- h. where relevant and in so far as it can be ascertained, the estimated financial damage and the amounts recovered following any investigation and proceedings referred to in paragraph (f).
- i. such other information relating to the performance of the functions of public bodies, prescribed bodies, as the case may be under this Act, as may be requested by the Minister.

15. Protected Disclosures reporting

Each public body or prescribed person shall prepare and publish on its website by the 31st March each year a report on their website in respect of the immediately preceding calendar year containing—

- a. a statement confirming that the public body or prescribed person has in place either or both of the following:
 - i. internal reporting channels and procedures.
 - ii. external reporting channels and procedures, and
- b. the information provided to the Minister under subsection 22.

This information can also be included in the annual report.

16. Records Management

Records created, maintained, and stored by the Council as part of the Protected Disclosure Policy and Procedures shall comply with the requirements of confidentiality under the 2014 & 2022 Acts and with the National Records Retention Policy (2001) and any other relevant records retention policies.

17. Freedom of Information

The Freedom of Information Act 2014 (the “FOI Act”) has been amended by the Protected Disclosures (Amendment) Act 2022. As a result of this amendment, the FOI Act does not apply to a record relating to a report made under the Act, whether the report was made before or after the date of the passing of the Protected Disclosures (Amendment) Act 2022. However, records concerning a public body’s general administration of its functions under the Act continue to be subject to FOI.

18. Monitoring of the Policy

The Council shall monitor the implementation of and compliance with the policy and will review it on a regular basis.

19. Key principles of Policy

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

Section 2: Protected Disclosure – External Reporting Channel

1. External Reporting Designated Person

The Chief Executive of Dublin City Council has appointed Fergus Feely as the designated person for receipt of external reporting of protected disclosures to the Chief Executive as a prescribed person. If reporting in writing, the reporting person can email the designated person at the following email address: fergus.feely@dublincity.ie or by post to: Fergus Feely, Strategy and Change Unit, Block 3, Floor 1, Civic Offices, Dublin 8. Reports made orally should be made to: Fergus Feely, Mob No: 0870524482.

Dublin City Council may also separately assign overall responsibility for Protected Disclosures to the Chief Executive as a prescribed person to a Designated Director.

2. What details should the disclosure include?

A protected disclosure should contain “information” which tends to show wrongdoing. The ordinary meaning of disclosing “information” is conveying facts, such as stating the particular facts of what occurred. This is different to simply making an allegation based on a suspicion that is not founded on anything tangible, however the general context of any statement would need to be assessed to determine if it qualified as a protected disclosure.

At a minimum, the disclosure should include the following details: -

- a. that the report is a protected disclosure and is being made under the Procedures to a prescribed person.
- b. the reporting person’s name, place of work, and confidential contact details.
- c. the date of the alleged wrongdoing (if known) or the date the alleged wrongdoing commenced or was identified.
- d. whether the alleged wrongdoing is still ongoing.
- e. whether the alleged wrongdoing has already been disclosed and if so, to whom, when, and what action was taken.
- f. information in respect of the alleged wrongdoing, including, what is occurring/has occurred and how, and any supporting information.
- g. the name of any person(s) allegedly involved in the alleged wrongdoing (if you believe this is necessary to expose the wrongdoing); and
- h. any other information the discloser thinks may be relevant.

While a disclosure may be made anonymously through the appropriate reporting channels, the extent to which these procedures can be applied and implemented is significantly restricted in the case of anonymous disclosures. It should also be noted that an individual cannot obtain redress under the Act without identifying themselves as part of the process of seeking redress.

3. Management by Designated Person of Protected Disclosures

3.1 Acknowledgement

The designated person(s) will acknowledge, in writing, to the reporting person, receipt of the report within seven calendar days of its receipt unless: - the reporting person has requested otherwise or - the designated person(s) reasonably believes acknowledgement of the receipt would jeopardise the protection of the identity of the reporting person.

The acknowledgment will provide further detail on the following:

- The protected disclosures process and a copy of procedures,
- Details of next steps,
- Protections afforded the worker submitting the protected disclosure from a protection of identity and penalisation perspective,
- Type of feedback that will/won't be provided.

3.2 Initial Assessment

On receipt of the protected disclosure, an initial assessment of the disclosure will be undertaken by the officer designated to receive protected disclosures to the Chief Executive as a prescribed person. In the case of a report made orally, by telephone or through other voice messaging systems and, upon request by the reporting person, the designated person may seek further information from the reporting person by means of a physical meeting for the purposes of the initial assessment. This initial assessment will determine as provided for under the Act as follows.

- Does the disclosure made, fall within the scope of matters which fall under the responsibility of the Chief Executive of Dublin City Council as a prescribed person.
- In such circumstances where it is determined that the disclosure made does not fall into scope of matters for which the Chief Executive has responsibility, the disclosure is transferred to another prescribed person or the Protected Disclosures Commissioner for assessment and the reporting person is notified in writing of this and the reasons for doing so.
- If the disclosure made is within the scope of matters which fall under the responsibility of the Chief Executive of Dublin City Council as a prescribed person, is there prima facie evidence that a relevant wrongdoing occurred. In such instances where there is no prima facie evidence the procedure is closed, and the reporting person is notified in writing of this and the reasons for doing so.
- If the information is within scope with prima facie evidence indicating a relevant wrongdoing occurred but the relevant wrongdoing is clearly minor and does not require follow-up. The procedure is closed, and the reporting person is notified in writing of this and the reasons for doing so.
- If the information does or does not contain any meaningful new information about a relevant wrongdoing compared to a previous report (including any report made before the commencement of section 11 of the Protected Disclosures (Amendment) Act 2022 (in this clause referred to as a 'past report') made or transmitted to the prescribed person or to any other person in respect of which the relevant procedures (including any

procedures that applied at the time any past report was made) were concluded, unless new legal or factual circumstances justify a different follow-up, the procedure is closed and the reporting person is notified in writing of this and the reasons for doing so.

- In the event that the Designated Officer is of the view that that the procedure is closed, the reporting person will be advised of this assessment and if a reporting person is not satisfied with the outcome of the initial assessment they can request a review of that decision in writing to the designated officer and it will be reviewed in as far as possible by somebody other than the initial decision maker.
- Where the information is within scope of responsibility of the Chief Executive and after initial assessment, the designated officer determines that there is prima facie evidence that a relevant wrongdoing may have occurred, appropriate action will be taken within the functions of the Chief Executive to address the wrongdoing. This will normally involve determining whether the alleged wrongdoing can or should be investigated and if so, what steps should be taken.

3.3 Investigation

If an investigation is required, Dublin City Council will consider the nature and extent of the investigation required. This could consist of an informal approach for less serious wrongdoings, a detailed and extensive investigation of serious wrongdoing, or an external investigation by another body.

Where considered necessary, terms of reference, which will determine the scope, and conduct of the investigation will be drawn up. Regardless of the approach taken, the principles of natural justice and fair procedures will apply. Respondents will have the right to know the allegations against them and the right to a fair hearing. This may include a right to challenge the evidence against them. This right will need to be balanced against rights in the legislation, such as the right of the reporting person to have their identity protected.

In general, the respondent's right to representation will be limited to a co-worker or trade union representative. There is no automatic right to legal representation at investigation meetings however a right to legal representation may arise in exceptional cases. In such circumstances the respondent has no legal right to have legal costs paid by Dublin City Council. This equally applies to legal representation and payment of legal costs for the reporting persons.

3.4 Feedback

Feedback will be provided to the worker within three months of acknowledgement of receipt of the protected disclosure or within 3 months of date of receipt of disclosure if no acknowledgement is sent within three months of receipt of the disclosure. The worker can request in writing that they wish to receive further feedback after the initial three-month period until such time as the protected disclosure process is closed.

The legislation defines feedback as the provision of information to the reporting person on the action envisaged or taken as follow-up and the reasons for that follow-up. Follow up is defined as any action taken to assess the accuracy of the information submitted and, where relevant, to address the wrongdoing reported.

The format and detail of the feedback will be such as to not prejudice the outcome of any investigation or any action that ensues by undermining the right to fair procedures. Any such feedback is provided in confidence and should not be disclosed by the reporting person, other than to their legal advisor or trade union representative.

3.5 Review of Decisions

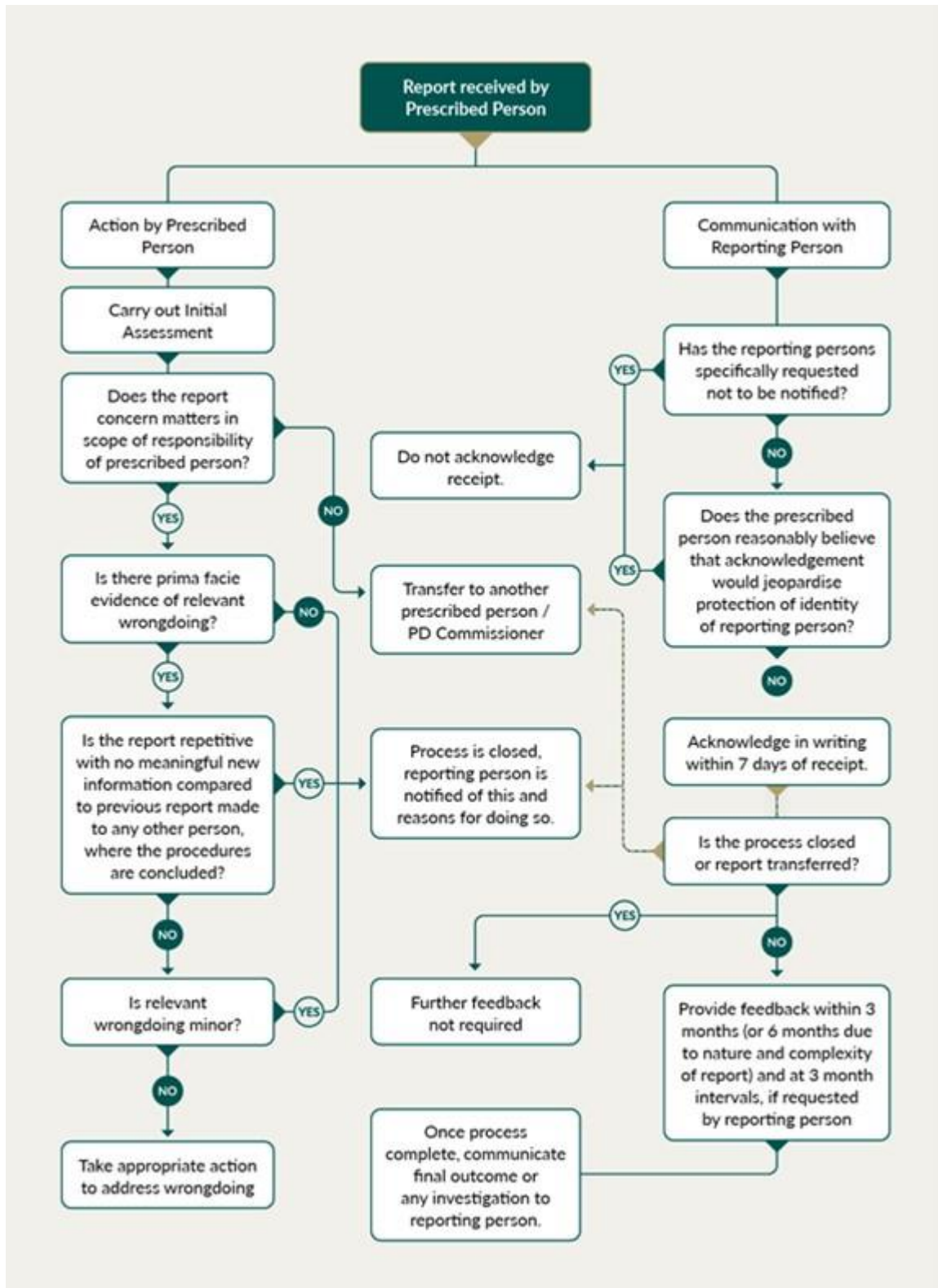
Decisions and actions taken by Dublin City Council on foot of the receipt of a protected disclosure can be reviewed, if requested by a party affected by any of the following processes:

- The conduct or outcome of any follow-up actions (including any investigation) taken on foot of the receipt of a protected disclosure.
- The conduct or outcome of any investigation into a complaint of penalisation; and
- Any decision to disclose the identity of a reporting person (except in exceptional circumstances).

The purpose of the review will not be to re-investigate the matter in question and will only address specific issues that the party in question believes have received insufficient consideration. The outcome of the review will be final and there will be no further entitlement to further reviews of the same issue.

This review will be undertaken by a Senior Manager who has not been previously involved in the Protected Disclosures process.

Figure 1: Reporting Channel



Appendix A

Strictly Confidential

Dublin City Council

Form for Reporting a Protected Disclosure to the Chief Executive of Dublin City Council as a prescribed person.

NAME (Optional):	
AREA OF WORK (Optional):	
CONTACT DETAILS (Optional):	
DATE OF SUBMISSION OF FORM:	

1. Please give date of alleged wrongdoing (if known) or date the alleged wrongdoing commenced or was identified: _____

2. Is the alleged wrongdoing ongoing? Yes No

3. Has the alleged wrongdoing already been disclosed to any member of management or another worker/worker? Yes No

If so when was the wrongdoing disclosed and to what effect?

4. Please give details of alleged wrongdoing and any support information:

5. Please give name of the person(s) (if known or applicable) allegedly involved in alleged wrongdoing:

6. Any other relevant information: