

# **HOUSES OF THE OIREACTHAS SERVICE PROTECTED DISCLOSURES POLICY AND PROCEDURE<sup>1</sup>**

**This is the Policy and Procedure document published by the Houses of the Oireachtas Service<sup>2</sup> pursuant to section 21(1) of the *Protected Disclosures Act 2014* for the making of protected disclosures by workers in the Houses of the Oireachtas Service and for dealing with such disclosures.**

*Note: This document is not intended to be a complete or authoritative statement of the law or a legal interpretation of the *Protected Disclosures Act 2014*.*

## **PART ONE**

### **POLICY**

#### **Purpose of this Policy and Procedure**

1. This document outlines the Houses of the Oireachtas Service's (the "Service") policy and procedure for dealing with disclosures by workers who have a reasonable belief that wrongdoing has occurred and/or is ongoing i.e. protected disclosures. This policy and procedure document (the "Policy and Procedure") is grounded in and follows closely the requirements set out in the *Protected Disclosures Act 2014* (the "2014 Act").
2. The procedure contained herein sets out the process by which you can make a disclosure, what will happen when a disclosure is made, and what protections you are entitled to when a disclosure has been made.

#### **The Service's Commitment**

3. The Service values a culture of openness, honesty and accountability. It sets itself high standards of professional and ethical conduct, as detailed in the Civil Service Code of Standards and Behaviour. However, it recognises that all organisations face risks associated with potential wrongdoing. Everyone has a duty to be vigilant, to identify and report potential wrongdoing.
4. In furtherance of the above, the Service is committed to maintaining an open culture with the highest standards of honesty and accountability where workers can report concerns in confidence.

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<sup>1</sup> OPLA File no 1907.20.ME. 19 Mar 2020.

<sup>2</sup> Under the Acts that establish the Houses of the Oireachtas Service, the worker's employer is known as the Houses of the Oireachtas Commission. The Commission has members who hold particular offices, such as the Chairs of each House of the Oireachtas. The collective staff and activity of the Commission are known in the relevant Acts as the Houses of the Oireachtas Service. For ease of reference, the employer is referred to as the "Service" in this document to distinguish the employer from the people who are members of the Commission.

5. The Service and all its officers who manage and direct it are committed to the following:
  - a) Encouraging you to feel confident and safe in raising relevant wrongdoings and disclosing information at the earliest possible opportunity;
  - b) Providing avenues for you to raise relevant wrongdoings in confidence and receive feedback on any action taken;
  - c) Ensuring confidentiality and protection of your identity in a manner consistent with the requirements of the 2014 Act, and taking action where those requirements have been breached;
  - d) Reassuring you that you will be protected from penalisation or any threat of penalisation;
  - e) Assessing appropriately any disclosure made, conducting an investigation where warranted, and addressing all findings that require attention.

**What is a “protected disclosure”?**

6. A protected disclosure is a disclosure of relevant information which in the *reasonable belief* of the *worker* tends to show one or more *relevant wrongdoings*. The wrongdoing must come to the worker’s attention in connection with his or her employment and is disclosed in the manner prescribed by the 2014 Act.

**What is a “reasonable belief”?**

7. The term “reasonable belief” means that the belief that a relevant wrongdoing has occurred is based on reasonable grounds. This does not mean that the belief has to be correct. Workers are entitled to be mistaken in their belief, so long as their belief was based on reasonable grounds. The disclosure will be assessed on the basis of how a reasonable person would respond to the information available to him or her at the time that the disclosure was made. The motivation of the worker for making a disclosure is irrelevant in determining if it is a protected disclosure under the 2014 Act.

**What is a ‘relevant wrongdoing’?**

8. The following 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 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.

**To whom does the Policy and Procedure apply?**

- 9. The Policy and Procedure applies to all of the Service’s “workers” as defined in section 3 of the 2014 Act, which includes all current and former employees, independent contractors, trainees and agency staff.
- 10. Volunteers and members of the public may disclose relevant wrongdoing and, whilst such disclosures will be appropriately assessed and investigated where warranted, it is important to note that volunteers and members of the public are not included in the definition of a “worker” and therefore are not afforded the protections under the 2014 Act.

**What types of disclosures can be raised under this procedure?**

- 11. A protected disclosure should contain “relevant information” which tends to show a “relevant wrongdoing”. This is different to simply making an allegation on the basis of a suspicion that is not founded on anything tangible. The information should be factual, such as stating that particular events have occurred. A disclosure should relate to a relevant wrongdoing as prescribed by the 2014 Act, such as possible fraud, crime, danger or failure to comply with any legal obligation which has come to your attention in connection with your employment and about which you have a reasonable belief of wrongdoing.
- 12. You are not required and nor are you entitled to investigate matters yourself to find proof of your suspicion and should not endeavour to do so. All you need to do, and should do, is disclose the information to your line manager or to [protecteddisclosures@oireachtas.ie](mailto:protecteddisclosures@oireachtas.ie) (see Part Two of this Policy and Procedure), based on the reasonable belief that it discloses a relevant wrongdoing and, where the information relates to individuals, that it is necessary to disclose that information.

**What types of concerns should not be raised under this procedure?**

- 13. The 2014 Act is intended to deal with disclosures in the public interest. This normally involves wrongdoings that are likely to cause harm to the organisation itself or to the general public, rather than to personal complaints or general day-to-day operational reporting. Purely personal grievances and matters that are not covered by the protected

disclosures procedure remain to be dealt with under the relevant policies or procedures, some of which are detailed below.

14. Accordingly, this Policy and Procedure should also be read in conjunction with the following (non-exhaustive) list of guidance policies, to ensure that the issue being reported does not fall within an existing policy or process:
  - Civil Service Grievance Procedures (Circular 11/2001);
  - The Houses of the Oireachtas Commission Dignity and Respect Policy and/or the Civil Service Dignity at Work Policy 2015;
  - Civil Service Disciplinary Code (Circular 19/2016);
  - Civil Service Code of Standards and Behaviour;
  - Civil Servants and Political Activity (Circular 09/2009);
  - Oireachtas Service ICT Acceptable Usage Policy;
  - Oireachtas Service Data Protection Privacy Notice for Staff;
  - Guidelines on compliance with the provisions of the Ethics in Public Office Acts 1995 and 2001;
  - Oireachtas Service Customer Charter and Action Plan.
15. In addition, it should be noted that this Policy and Procedure:
  - does not cover disclosures of wrongdoing if the matter is one which it is the function of the worker to detect, investigate or prosecute;
  - does not cover a disclosure of information obtained by unlawful or improper means, e.g. unlawful or improper access to computer systems or databases; and/or
  - does not replace any legal reporting or disclosure requirements. Where statutory reporting requirements exist, these must be complied with.
16. It is important to note that this Policy and Procedure 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, the Service will take disciplinary or other appropriate action.

## **Safeguards and Penalisation**

17. A worker who makes a disclosure based on a reasonable belief of wrongdoing will not be penalised by the Service, even if the disclosure turns out to be unfounded or mistaken.
18. Penalisation means any act or omission that affects a worker to the worker's detriment arising from having made a protected disclosure, and in particular includes:
  - a) suspension, lay-off or dismissal;
  - b) demotion or loss of opportunity for promotion;
  - c) transfer of duties, change of location of place of work, reduction in wages or change in working hours;
  - d) the imposition or administering of any discipline, reprimand or other penalty (including a financial penalty);
  - e) unfair treatment;
  - f) coercion, intimidation or harassment;
  - g) discrimination, disadvantage or unfair treatment;
  - h) injury, damage or loss; and
  - i) threat of reprisal.
19. If you believe that you are being subjected to penalisation as a result of making a disclosure under this procedure, you should inform your line manager, or where appropriate, the relevant Protected Disclosures Recipient (as defined in paragraph 27 of this Policy and Procedure), immediately.
20. Workers who penalise or retaliate against any person who has raised a protected disclosure under this Policy and Procedure will be subject to disciplinary action.

## **Confidentiality**

21. The Service is committed to protecting the identity of the worker making a protected disclosure. The Protected Disclosures Recipient and any person to whom a disclosure is referred, will not disclose to another person any information that might identify the discloser except when:
  - a) 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,
  - b) 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,

- c) the person to whom the protected disclosure was made or referred reasonably believes that disclosing any such information is necessary for:
    - (i) the effective investigation of the relevant wrongdoing concerned,
    - (ii) the prevention of serious risk to the security of the State, public health, public safety or the environment, or
    - (iii) the prevention of crime or prosecution of a criminal offence,or
  - d) the disclosure is otherwise necessary in the public interest or is required by law.
22. Workers who are concerned that their identity is not being protected should notify the relevant Protected Disclosures Recipient. The Service is committed to assessing and/or investigating such notifications and will take appropriate action where necessary.
23. All reasonable steps will be taken to protect the confidentiality of those who are the subject of allegations in a protected disclosure. There is a responsibility on all staff, especially those involved in the process, including the discloser and the person against whom an allegation is made, to help ensure that the identity of the person who made the disclosure and the person against whom an allegation is made are protected. Their identities should not become common knowledge and a matter of general comment. Confidentiality is required from all parties to ensure fair process.

### **Anonymity**

24. A protected disclosure may be raised anonymously. However, on a practical level it may be difficult to investigate such a disclosure. We would encourage workers to put their names to allegations, with assurance of confidentiality where possible, in order to facilitate appropriate follow-up. This will make it easier for the Service to assess the disclosure and take appropriate action, including an investigation if necessary. It is also important to emphasise that a worker cannot obtain redress under the 2014 Act without identifying themselves.

### **Responsibility for Policy and Procedure and Key Contacts**

25. Overall responsibility for this Policy and Procedure rests with the Management Board of the Service. Day-to-day responsibility for this procedure is delegated to the Office of the Commission and Secretary General (OCSG).

## PART TWO

### PROCEDURE

#### How to report a disclosure

26. Concerns should first be raised with a worker's line manager, who will assist you in understanding the relevant employment policies, including, in particular, this Policy and Procedure. The line manager will advise the worker if they are of the view that the matter should be more appropriately dealt with under an alternative policy (such as those set out at paragraph 14). If the line manager is in a position to address and/or resolve the issue, through the taking of such steps as the line manager deems necessary, then such action as might reasonably be expected in the circumstances shall be taken by the line manager. This action may include the referral of the disclosure to [protecteddisclosures@oireachtas.ie](mailto:protecteddisclosures@oireachtas.ie) for onward transmission to one of the assigned Protected Disclosures Recipients for assessment.
27. Alternatively, you may make your disclosure of wrongdoing directly to [proteceddisclosures@oireachtas.ie](mailto:proteceddisclosures@oireachtas.ie). This email repository is accessible only by designated staff (at PO and AP level) of the OCSG. On receipt of a disclosure, the OCSG, as part of its role in the day-to-day management of this Policy and Procedure (see paragraph 25), will assign your disclosure to one of the Service appointed Protected Disclosures Recipients for assessment. The Protected Disclosures Recipients for the purpose of this policy and procedure are: Assistant Secretaries: Michael Errity and Annette Connolly.
28. In the event that neither Protected Disclosures Recipient is in a position to deal with a disclosure, the Service reserves the right to engage an appropriately qualified external third party to assess, investigate, review and/or otherwise deal with a disclosure. If this decision is being taken, you will be notified in advance of same and provided with reasons for this decision.
29. Where the Service seeks the services of an appropriately qualified external third party in line with paragraph 28, any decision taken in respect of dealing with the disclosure, or the making of findings and/or recommendations, shall be that of the relevant third party. Any disclosure outsourced to a third party in line with paragraph 28, shall be managed by the OCSG in line with their day-to-day responsibility for the management of this policy, and the procedures thereunder.
30. The earlier a disclosure is made, the easier it will be for the Service to take effective action.
31. Disclosures may be raised verbally or in writing. Should you make your disclosure verbally, the Service will keep a written record of the conversation and provide you with a copy of that record after the meeting at which the disclosure was made. Should you wish to make a disclosure in writing, you should set out the details of the subject matter of the disclosure on the Protected Disclosures Information Form (see Part Three of this document) and submit it to your line manager or a Protected Disclosures Recipient as indicated above. The form is to assist a person who wants to make a disclosure; to help

avoid potential confusion about the disclosure information; and to be clear that the disclosure is being made under the protection of the 2014 Act.

## **How your disclosure will be dealt with**

### **Step One: Initial Assessment**

32. Having raised your disclosure verbally or in writing, an initial assessment will be carried out to determine if the matter should be treated as a potential protected disclosure and to carry out a risk assessment of the matter. A meeting may be arranged with you and the relevant Protected Disclosures Recipient to discuss the matter. Any such meeting will clarify if the concern is appropriate to this Policy and Procedure or is a matter more appropriate to other procedures, for example the Grievance or Dignity at Work Policy procedures. You can choose whether or not to be accompanied by a colleague or trade union representative.
33. Having clarified that the matter is in fact appropriate to this Policy and Procedure, an assessment will be carried out to examine what actions will need to be taken to effectively deal with the disclosure. This may involve simply clarifying matters, clearing up misunderstandings or resolving the matter by agreed action without the need for an investigation. The Protected Disclosures Recipient may appoint an appropriately qualified person to conduct the initial assessment. Any decision on the actions, if any, to be taken in order to deal with the disclosure, shall be that of the Protected Disclosures Recipient.

### **Step Two: Investigation**

34. If it is concluded, on foot of the initial assessment, that there are matters that require further investigation, such an investigation will be carried out fairly and objectively. The form and scope of the investigation will depend entirely upon the subject matter of the disclosure. The Protected Disclosures Recipient, who may seek advice on the matter, shall decide how the investigation is to be carried out and may assign an appropriately qualified investigator (either internal or external) depending on the specific circumstances of each particular case.
35. Where the Protected Disclosures Recipient seeks advice or assigns any part of a Protected Disclosures assessment or investigation to an appropriately qualified internal person, any decision taken in respect of dealing with the disclosure, or the making of findings and/or recommendations, shall be that of the Protected Disclosures Recipient.
36. Disclosures may, in light of the seriousness of the matters raised, be referred immediately to the appropriate authorities. Likewise, if urgent action is required (for example to remove a health and safety hazard), the Protected Disclosures Recipient will request that this action be taken.
37. If, at any time during an investigation, the investigator for the purpose of this procedure believes the disclosure to be false, frivolous, vexatious or not relevant under this procedure, he/she may cease, or recommend the cessation, as appropriate, of the investigation to the Protected Disclosures Recipient.

38. If at any time during the investigation, the investigator for the purpose of this procedure believes the disclosure to be the same or substantially the same as a disclosure previously reported, investigated and acted upon appropriately, whether by the same or a different discloser, the investigator may cease, or recommend the cessation, as appropriate, of the investigation to the Protected Disclosures Recipient.
39. If an investigation is ceased, the Protected Disclosures Recipient will provide reasons why the investigation is to be discontinued, if requested to do so.
40. If, after an appropriate investigation has been undertaken, it is determined that wrongdoing has occurred, then the findings will be addressed, and appropriate action will be taken where necessary.
41. Where a disclosure is made in accordance with this Policy and Procedure, but the allegation is subsequently not upheld by an investigation, no action will be taken against the worker making the disclosure and the worker will be protected from penalisation. It is important to note that an unfounded allegation made in the absence of reasonable belief may result in disciplinary action being taken under the Civil Service Disciplinary Code.

### **Step Three: Review**

42. The worker who makes a protected disclosure pursuant to this Policy and Procedure may seek a review of the following:
  - a) Any decision made to disclose their identity (unless exceptional circumstances apply);
  - b) The outcome of the assessment / investigation undertaken in respect of the disclosure, including a decision to cease the investigation; and/or
  - c) The outcome of any assessment / investigation in respect of any complaint of penalisation.
43. The review process will be undertaken by a person or persons who have not been involved in the initial assessment, investigation or decision. Where a decision is taken to disclose the identity of the worker who has made the disclosure, this worker will be offered a review of the decision before his or her identity is disclosed.
44. Where the review undertaken relates to the outcome of any assessment or investigation, the review will be of the assessment or investigative process and not a full *de novo* reassessment of the substantive issue.
45. There is no entitlement to two reviews in respect of the same issues.

### **Consultation and Feedback**

46. It is important to the Service that you feel assured that a disclosure made by you under this Policy and Procedure is taken seriously and that you are kept informed of the steps being taken in response to your disclosure. In this regard the Service will, as far as practicable, communicate with you as follows:

- a) We will acknowledge receipt of your disclosure and arrange to meet with you as outlined above.
- b) We will inform you of how we propose to investigate the matter and keep you informed of any actions where possible to do so, including the outcome of any investigation. It is important to note that sometimes the need for confidentiality and legal considerations may prevent us from giving specific details of an investigation and/or its outcome.
- c) We will inform you of the likely time scales in regard to each of the steps being taken, but in any event, we commit to dealing with the matter as quickly as practicable.
- d) It is possible that in the course of the investigation you may be asked to clarify certain matters.

### **Protecting the Rights of Workers Subject to a Disclosure**

- 47. Where the disclosure made relates to a named individual or individuals, the principles of natural justice and fair procedures will be complied with, as appropriate.
- 48. A worker who is the subject of such a disclosure is entitled to fair treatment and will be made aware of, and given the opportunity to respond to, the allegations against them during the investigatory process. Such individuals should treat any information about the investigation as strictly confidential and any breach of confidentiality may result in disciplinary action. All reasonable steps will be taken to protect the confidentiality of those who are the subject of allegations in a protected disclosure.

### **External Disclosures**

- 49. The aim of this Policy and Procedure is to provide an avenue within the workplace to deal with disclosures in regard to relevant wrongdoing. We are confident that issues can be dealt with internally and we strongly encourage workers to report such concerns internally.
- 50. The 2014 Act allows a worker to make a disclosure to persons other than their employer in certain circumstances. Different requirements need to be met depending on the external party to whom the protected disclosure is being made, as set out at (a) to (e) below. If you decide to make a disclosure to an external party, it will be for that party to decide if it is, in fact, a protected disclosure (the assessment) and to determine the nature of any investigation that may take place.
  - a) **Other responsible person:** Where the 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 the Protected Disclosures Act 2014 (Section 7(2)) Order 2014 (S.I. No. 339 of 2014) (as amended) ("S.I.

339”) to receive disclosures (“Prescribed Persons”). These include the heads or senior officials of a range of statutory bodies.

A worker may make a 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 S.I. 339. In addition, the 2014 Act requires that the worker making such a disclosure to a Prescribed Person believes that the information disclosed, and any allegation contained in it, are substantially true.

There is no person specifically prescribed under S.I. 339 in respect of the Service.

- c) **A Minister of the Government:** If a worker is or was employed in a public body, they may make a disclosure to the Minister on whom any function related to the public body is conferred or imposed by or under any enactment. The relevant Minister for the Service would be the Minister for Public Expenditure and Reform.
- d) **A legal adviser:** The 2014 Act allows a disclosure to be made by a worker in the course of obtaining legal advice from a barrister, solicitor, trade union official or official of an excepted body (within the meaning of section 6 of the Trade Union Act 1941). It is important to note that the seeking of legal advice in itself will not constitute a protected disclosure under the 2014 Act; there still must be a specific disclosure of “*relevant wrongdoing*”. However, a confidential request for legal advice may be protected in other ways.
- e) **Alternative external disclosures:** The 2014 Act allows alternative external disclosures in limited circumstances if certain stringent requirements are met. However, for the protection of the worker, it is important for him or her to appreciate that external disclosure does require very specific justification under the 2014 Act, and that for an attempt at protected disclosure to an external person to qualify as a “*protected disclosure*” the worker must fulfil a number of demanding criteria, many of which could be very sensitive to the particular context of the disclosure.

It is therefore preferable in most circumstances to make the disclosure to the employer and, if that is not appropriate, to one of the disclosure options at (a) to (d) above. It will rarely be appropriate to make alternative external disclosures where the disclosure could be dealt with through one of the other disclosure options above.

The criteria a worker must satisfy to make a protected external disclosure are:

- The worker must reasonably believe that the information disclosed, and any allegation contained in it, are substantially true; AND
- The disclosure must not be made for personal gain; AND
- At least one of the following conditions at (i) to (iv) must be met:

- (i) At the time the disclosure was made the worker reasonably believed that he or she would be penalised if he or she made the disclosure to the employer, a responsible person, a prescribed person or a Minister; or
  - (ii) Where there is no relevant prescribed person, the worker reasonably believed that it was likely that evidence would be concealed or destroyed if the worker made the disclosure to the employer or responsible person; or
  - (iii) The worker has previously made a disclosure of substantially the same information to the employer, a responsible person, a prescribed person or a Minister; or
  - (iv) The wrongdoing is of an exceptionally serious nature; AND
- In all these circumstances, it is reasonable for the worker to make an alternative external disclosure.

The assessment of what is reasonable takes account of, among other things, the identity of the person to whom the disclosure is made, the seriousness of the wrongdoing, whether the wrongdoing is ongoing or likely to occur in future, whether any action had been taken in cases where a previous disclosure was made and whether the worker complied with any procedures in place when making that previous disclosure.

Even more stringent requirements are imposed in relation to disclosures that may affect law enforcement, security, defence, international relations, and intelligence. For full details on these matters please refer to the *Protected Disclosures Act 2014*.

### **Support and Advice**

- 51. A Civil Service worker who wishes to avail of additional resources and support arising from their concerns or interaction with these policies and procedures may contact the Civil Service Employee Assistance Service at <http://cseas.per.gov.ie/>

### **Records**

- 52. Records of disclosures made, including the outcome, will be maintained by the OCSG for a minimum of seven years after the closure of the case. These records will be maintained in a confidential and secure environment. A summary report in relation to protected disclosures made in the preceding year will be published not later than 30 June each year in a form which does not enable the identification of the persons involved.

### **Communication, Monitoring and Review**

- 53. This Policy and Procedure will be communicated as appropriate and will be subject to regular monitoring and review in consultation with all appropriate parties.

Issued on behalf of the Management Board.

## PART THREE PROTECTED DISCLOSURES FORM

<b>Person making a disclosure: under the Protected Disclosures Act 2014 and in accordance with the Service's Protected Disclosures Policy and Procedure</b>	
Name	<i>This section may be left blank if person wants to remain anonymous – please refer to the relevant section of the Policy on anonymous disclosures</i>
Preferred contact address	
Preferred contact phone number	
Preferred contact email address	
<b>Relevant Information</b>	
Please indicate the relevant wrongdoing(s)	Relevant Wrongdoings under the Act - Section 5(3) <ul style="list-style-type: none"> <li><input type="checkbox"/> an offence has been, is being or is likely to be committed,</li> <li><input type="checkbox"/> 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,</li> <li><input type="checkbox"/> a miscarriage of justice has occurred, is occurring or is likely to occur,</li> <li><input type="checkbox"/> the health or safety of any individual has been, is being or is likely to be endangered,</li> <li><input type="checkbox"/> the environment has been, is being or is likely to be damaged,</li> <li><input type="checkbox"/> 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,</li> <li><input type="checkbox"/> an act or omission by or on behalf of a public body is oppressive, discriminatory or grossly negligent or constitutes gross mismanagement,</li> <li><input type="checkbox"/> 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.</li> </ul>
Is the wrongdoing still ongoing or is it likely to occur in the future?	
Please give detail of the wrongdoing, including background and history. <i>Care should be taken to only include the name/s of individual/s where directly relevant and necessary to the making of the disclosure.</i>	
Please provide supporting information on the relevant wrongdoing(s)	
When did the wrongdoing happen and when did it first come to your attention	
Was the wrongdoing already disclosed to any member of management or other person, and if so, when and to what effect?	
Any other information or comments?	
<b>Date of Disclosure</b>	
Date	
Signature (optional) See Guidelines	