

NATIONAL GALLERY OF IRELAND SPEAK-UP POLICY

1. INTRODUCTION AND POLICY STATEMENT

- 1.1. The National Gallery of Ireland (the “**Gallery**”) is committed to conducting its affairs lawfully, honestly and with integrity, and expects every member of the Gallery community to maintain the highest standards in this regard.
- 1.2. This Policy expresses the Gallery’s commitment to addressing concerns about wrongdoing that may arise and protecting Workers (as defined at section 2 below) who make reports of wrongdoing under this Policy. A workplace culture of openness and accountability is essential in order to prevent wrongdoing and to address wrongdoing if it does occur.
- 1.3. The aims of this Policy are:
 - a) to encourage the reporting of concerns about Relevant Wrongdoing in the knowledge that reports will be taken seriously and investigated as appropriate;
 - b) to provide guidance as to how to raise those concerns; and
 - c) to reassure Workers that genuine concerns can and should be raised, even if they turn out to be mistaken, without fear of penalisation.
- 1.4. This Policy was introduced in 2015 to reflect the provisions of the Protected Disclosures Act 2014. That Act has since been amended by the Protected Disclosures (Amendment) Act 2022 (together with the 2014 Act, the “**Acts**”), principally to comply with the requirements of the EU Whistleblowing Directive. This Policy has been updated to comply with these new requirements and with reference to the *Protected Disclosures Act Interim Guidance for Public Bodies and Prescribed Persons* issued by the Department of Public Expenditure and Reform in November 2022 (the “**DPER Guidance**”).
- 1.5. The effective date of this policy is **1 January 2023**.

2. SCOPE OF THIS POLICY

This Policy covers all Workers in the Gallery. “**Workers**” in this context includes past and present members of the Board of Governors and Guardians, permanent and fixed-term employees, officers, consultants, volunteers, contractors, interns, work experience students,

casual workers, temporary agency employees, shareholders, job applicants, those involved in pre-contractual negotiations with the Gallery and self-employed persons working at the Gallery.

3. STATUS OF THIS POLICY

This Policy sets out the procedure for making protected disclosures under the Acts. This Policy is voluntary on the part of the Gallery and does not form part of any contract whether of employment or otherwise, thus it may be amended at any time.

4. RESPONSIBILITY

- Oversight of this Policy rests with the Board of Governors & Guardians.
- Overall responsibility for oversight of the procedures relating to internal reporting set out in this Policy rests with the Director of the Gallery.
- Overall responsibility for procedures for external reporting rests with the persons designated as prescribed persons under the Acts or the Minister (as defined below), depending on the external channel chosen.
- Responsibility for handling reports received or referred to the Office of the Protected Disclosures Commissioner (the “**Commissioner**”) lies with the Commissioner.
- Day-to-day responsibility for this Policy rests with HR.
- The Head of Collections & Research shall:
 - continuously monitor this Policy;
 - “champion” the protected disclosures process; and
 - promote and drive cultural change and a change in attitudes to protected disclosures among all employees of the Gallery.

5. WHAT IS A PROTECTED DISCLOSURE?

- 5.1. A **protected disclosure** is the disclosure of Relevant Information, namely information which, in the reasonable belief of the Worker, tends to show one or more Relevant Wrongdoings within the Gallery and which came to the attention of the Worker in a work-related context.
- 5.2. Where the Worker reasonably believes that the wrongdoing relates solely or mainly to the conduct of a person other than their employer, or to something for which that other person has legal responsibility, then the Worker can disclose to that other person.

6. WHAT IS A RELEVANT WRONGDOING?

Relevant Wrongdoings are the following, which have been, or are being or are likely to be committed or occur:

- (a) an offence;
- (b) a failure to comply with any legal obligation (other than one arising under the contract of employment of the Worker making the disclosure, in respect of which the Gallery's Grievance Procedure should be used, or other contract whereby the Worker undertakes to do or perform personally any work or services);
- (c) a miscarriage of justice;
- (d) the endangering of the health and safety of any individual;
- (e) damage to the environment;
- (f) unlawful or improper use of funds or resources of a public body;
- (g) an act or omission by or on behalf of a public body which is oppressive, discriminatory, grossly negligent or constitutes gross mismanagement;
- (h) the deliberate concealment of any of the above matters; or
- (i) certain breaches of EU law.

7. WHAT IS NOT INCLUDED

- 7.1. This Policy may not be used to raise a matter concerning interpersonal grievances exclusively affecting a reporting person, namely, grievances about interpersonal conflicts between the reporting person and another worker, or a matter concerning a complaint by a reporting person to, or about, their employer which concerns the worker exclusively. In such cases, the Worker should use the appropriate Gallery HR procedure, as advised by the Gallery's HR Department.
- 7.2. This Policy is not intended to act as a substitute for normal day to day operational reporting or other internal employment procedures.
- 7.3. If a Worker is uncertain whether something is within the scope of this Policy, they should seek advice from the Head of Collections & Research, whose contact details are as follows:

Contact title: Head of Collections & Research

Contact name: Kim Smit

Phone number: 01 663 3540

Email address: ksmit@ngi.ie

8. PROTECTION AND SUPPORT

- 8.1. The Gallery's strong commitment to this Policy means that a Worker can raise with the Gallery reasonably believed concerns about a Relevant Wrongdoing and be sure that a Worker will be supported and protected from repercussions. Provided the Worker has a reasonable belief that information that they became aware of in connection their employment/engagement tends to show Relevant Wrongdoing, it doesn't matter if they are mistaken. The Worker's motivation for raising a concern is irrelevant.
- 8.2. There is no question of a Worker having to prove anything. Workers should under no circumstances pursue their own investigations, however well intended, because a flawed or improper investigation could compromise our ability to take effective action.
- 8.3. Workers must, however, make a report in the manner set out in the Acts to gain the protections of the Act and higher standards apply when the protected disclosure is made externally.
- 8.4. If a Worker makes a Protected Disclosure, they are protected by law against dismissal or any form of penalisation as a result of raising a concern. Penalisation in this context means *"any direct or indirect act or omission which occurs in a work related context, is prompted by the making of a report and causes or may cause unjustified detriment to a worker"*.
- 8.5. Penalisation includes suspension, layoff, dismissal, demotion or loss of opportunity for 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 disciplinary, reprimand or other penalty, negative performance assessment, failure to convert a temporary contract into a permanent contract, medical referral, unfair treatment, coercion, intimidation or harassment, discrimination, disadvantage or injury, damage or loss, or threat of reprisal.
- 8.6. If a Worker believes that they have suffered any such treatment, they should inform the Head of Collections & Research immediately.

- 8.7. If the matter is not remedied, they should raise it formally using our Grievance Procedure.
- 8.8. Workers can seek independent advice and support if they are considering making a protected disclosure or have made a protected disclosure. Transparency International Ireland provides a free Speak-Up Helpline and Legal Advice Centre. Advice and support may also be available from workers' trade unions as well as Citizens' Advice.

9. CONFIDENTIALITY

- 9.1. We hope and expect that Workers feel free to report concerns openly, however we understand that a Worker may wish to raise a concern in confidence under this Policy.
- 9.2. If a Worker asks us to protect their identity by keeping same confidential, we will not disclose their identity without their consent. If the situation arises where we are not able to resolve or further investigate the concern without revealing their identity or if the disclosure of identity otherwise becomes necessary, we will discuss with the Worker how we can best proceed.
- 9.3. We do not encourage Workers to make disclosures anonymously because proper investigation will be more difficult and may be impossible if we cannot obtain further information from the Worker. The Gallery commits to acting upon such disclosures to the extent possible. Workers should note that they cannot obtain redress under the Acts without identifying themselves.
- 9.4. Workers who are concerned about possible penalisation or reprisals if their identity is revealed should come forward to the Head of Collections & Research and appropriate measures will then be taken to preserve confidentiality.

10. HOW TO RAISE A CONCERN

Concerns may be raised via **internal reporting channels** or **external reporting channels**. These are summarised in **Appendix 1** and set out in more detail below.

11. INTERNAL REPORTING CHANNELS

- 11.1. We hope that in many cases the Worker will be able to raise any concerns they may have with their line manager and they will be resolved without resort to the formal process outlined below, in particular for minor issues. However, where, for whatever

reason, they feel unable to resolve their concerns in this way, the following steps should be taken:

11.2. Step 1: Disclose

- 11.2.1. The Worker should put the disclosure in writing by emailing ksmit@ngi.ie. This account shall be accessible by the Head of Collections & Research only. Should the Worker consider it inappropriate that the Head of Collections & Research deal with the disclosure for whatever reason, including conflict of interest, they may email the Head of Legal and Risk at jbrennan@ngi.ie as an alternative (each such person being a “designated person”).
- 11.2.2. The Gallery shall ensure that channels for receiving internal reports shall be designed, established and operated in a secure manner that ensures that the confidentiality of the identity of the reporting person (and any third party mentioned in the report) is protected and prevents access thereto by persons other than such designated persons.
- 11.2.3. At a minimum, reports should include the information set out in **Appendix 2**.

11.3. Step 2: Acknowledge

The Worker’s disclosure shall be acknowledged by the designated person in writing to them via email not more than 7 days after its receipt. This acknowledgment shall append a copy of this Policy and outline how the Worker’s identity will be protected as well as measures to protect them from penalisation.

11.4. Step 3: Follow Up

This step involves Initial Assessment, the taking of appropriate action and the provision of feedback and clear information to Workers on reporting channels and procedures for making reports.

11.5. Step 3A: Initial Assessment

- 11.5.1. Following acknowledgment, the designated person (or another person specifically authorised for this purpose) will carry out an initial assessment to determine if there is prima facie evidence that a relevant wrongdoing has occurred and if the report should be treated as a protected disclosure.

- 11.5.2. The Worker may be invited to attend meetings in order to provide further information. They are entitled to take a fellow employee or an employee representative with them to any meeting if they believe they need additional support.
- 11.5.3. The designated person will inform the Worker of the outcome of that initial assessment:
- If there is no such evidence, the matter may be closed and the reporting person will be notified in writing of the decision and the reasons for it;
 - If it is clear that the concern falls more appropriately within another Gallery procedure, the Worker will be informed in writing of the closure of the matter under this Policy and that it should progress in accordance with that procedure.
 - If there is such evidence, the designated person (or delegate) shall take appropriate action to address the wrongdoing, including:
 - taking a decision as to whether an investigation is required and if so, the scope and nature of any such investigation;
 - If the matter is minor, informing the Worker in writing of closure of the matter under this Policy, the decision and the reasons for it;
 - transferring the matter to the appropriate prescribed person or the Commissioner and informing the Worker in writing of closure of the matter under this Policy, the transfer to that body and the reasons for doing so.

11.6. **Step 3B Investigation**

- 11.6.1. The Gallery may choose to appoint an internal or external investigator or investigators with relevant experience of investigations or specialist knowledge of the subject matter. In cases of a very serious nature, the matter may need to be reported to An Garda Síochána or another body with statutory power to investigate.
- 11.6.2. The general principles of fair procedures and natural justice shall be applied to investigations and formal terms of reference for investigation may be drawn up, depending on the nature of the report.

- 11.6.3. The Worker must, throughout the process and following the end of the process, treat any information about the investigation as confidential. Any breach of this confidentiality may result in disciplinary action.
- 11.6.4. Workers should be aware that the Acts allow the identity of the reporting person to be disclosed to other persons where necessary for follow-up of reports. Follow-up is defined as meaning any action taken, by the recipient of a report, or a person to whom the report is transmitted, to assess the accuracy of the information and, where relevant, to address the wrongdoing reported. Therefore, follow up includes the assessment and investigation of the report of a disclosure and actions taken to address the wrongdoing. Involvement of senior management will often be required to address issues raised, particularly where these are serious issues for the Gallery.

11.7. **Step 3C Feedback and Outcome**

- 11.7.1. Feedback will be provided to the reporting person within three months of acknowledgment of receipt of the report of a disclosure and that person will be advised when consideration of the disclosure is complete, except in exceptional cases. Further feedback may be requested in writing at three month intervals thereafter. Feedback can consist of actions taken or expected to be taken to address the wrongdoing reported. We will keep the Worker informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving to the Worker specific details of the investigation or any action taken as a result.
- 11.7.2. The overriding requirement when providing feedback is that no information is communicated that could prejudice the outcome of the investigation or any action that ensues (e.g. disciplinary, or other legal action, including prosecution) for example, by undermining the right to fair procedures enjoyed by the person against whom a report or allegation is made. In this regard, personal information in relation to another Worker will not be provided, including whether a disciplinary process has taken place and the outcome of any such process.

11.8. **Step 4: Review**

- 11.8.1. A right of review of the Gallery's decision or process followed may be requested by a person affected by any of the following:

- Where an investigation has made an adverse finding against a person that gives rise to a disciplinary process or further investigations/processes against that person;
- The conduct or outcome of any follow-up actions (including any investigation) taken on foot of the receipt of a report;
- 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 cases).

11.8.2. A review can be requested within one month of the notification of decision by emailing ksmit@ngi.ie or jbrennan@ngi.ie, as applicable. An applicant for review must submit their request in writing and outline the reasons why they are seeking a review. The designated person shall inform the Director that the request has been received. The Director may choose to conduct the review themselves or designate either a staff member of a more senior level of responsibility or an external party to conduct it on their behalf.

11.8.3. The role of the reviewer should not be to re-investigate the matter in question but to address the specific issues the applicant feels have received insufficient consideration. The reviewer should, therefore, consider:

- Whether the correct procedures were followed;
- For investigations, whether the terms of reference were adhered to;
- Whether the conclusions/findings could or could not reasonably be drawn from the information/evidence on the balance of probability.

11.8.4. Where a review finds significant shortcomings or failings in the process, the Gallery shall consider what further action(s) may or may not need to be taken in response to the findings.

11.8.5. The outcome of the review is final and there is no entitlement to further reviews of the same issue.

12. EXTERNAL DISCLOSING CHANNELS

12.1. This Policy provides an internal mechanism for making disclosures, reporting concerns, and investigating and remedying Relevant Wrongdoings. If a Worker has a concern about wrongdoing relating to the conduct or actions of a third party, to include a

customer, supplier or service provider, the Gallery strongly encourages them to first report such concerns internally within the Gallery under this Policy. In most cases, a Worker should not find it necessary to contact anyone externally.

- 12.2. As an alternative to the internal channel outlined above, a Worker may make a disclosure either orally or in writing through a number of external channels outlined at 12.3(i) to (iii) below. Before a Worker makes a disclosure via any external channel, we strongly encourage them to seek advice from the Head of Collections & Research as there are different requirements to be met, depending on the route chosen.

12.3. **(i) Disclosure to a “Prescribed Person”**

- 12.3.1. The Protected Disclosures Act 2014 (Disclosure to Prescribed Persons) Order 2020 (the “**2020 Order**”) sets out a list of “prescribed persons” to whom a disclosure may be made. Such prescribed persons include the Commissioner for Data Protection Commission, the Comptroller and Auditor General, a member of the Garda Síochána Ombudsman Commission and the Chief Executive of the Health and Safety Authority, amongst others. A full list of prescribed persons is set out in the [2020 Order](#).

- 12.3.2. A Worker may make a protected disclosure to a prescribed person if the reporting person reasonably believes that:

- a) the relevant wrongdoing falls within the description of matters in respect of which the prescribed person is prescribed; and
- b) the information disclosed, and any allegation contained in it, are substantially true.

- 12.3.3. A flowchart of the process for disclosure to a prescribed person is included at **Appendix 3**. However, the website of the relevant prescribed person should be consulted in each case for specific details of the correct reporting procedure to be followed.

12.4. **(ii) Disclosure to the Minister**

- 12.4.1. Workers who are or were employees of the Gallery can make a disclosure to the Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media. In order to make a disclosure to the Minister, the Worker must reasonably believe that the

information disclosed tends to show one or more relevant wrongdoings; and **one or more** of the following must also apply:

- The Worker has previously made a disclosure of substantially the same information to their employer, other responsible person, prescribed person, or relevant Minister, as the case may be, but no feedback has been provided to them in response to the disclosure within the period allowed, or, where feedback has been provided, the reporting person reasonably believes that there has been no follow-up or that there has been inadequate follow-up;
- The Worker reasonably believes the head of the public body concerned is complicit in the relevant wrongdoing reported;
- The Worker reasonably believes that the disclosure contains information about a relevant wrongdoing that may constitute an imminent or manifest danger to the public interest, such as where there is an emergency situation or a risk of irreversible damage.

12.4.2. To ensure that the Minister is aware of the Worker's intention, it is recommended that the Worker specifies, when making a disclosure under this channel, that it is a disclosure to the Minister under section 8 of the Protected Disclosures Act 2014. Disclosures received by Ministers are required to be forwarded by Ministers to the Commissioner who will in turn ensure that the report is sent to the most appropriate person to deal with the concern raised.

12.4.3. The website of the [Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media](#) should be consulted in each case for specific details of the correct reporting procedure to be followed.

12.5. (iii) Disclosure to the Protected Disclosures Commissioner

12.5.1. A reporting person who is uncertain as to whom the most appropriate prescribed person they can report to may instead make a disclosure to the Commissioner. The Commissioner's primary duty is to refer any reports received under the Acts to the most appropriate prescribed person (or other suitable person, if a prescribed person cannot be identified). Only as a last resort will the Commissioner directly follow-up on a report.

12.5.2. The Commissioner may receive disclosures by means of external reporting channels, which must meet the same criteria as the external reporting channels for

prescribed persons. The Commissioner may also receive disclosures which have been transmitted onwards from Government Ministers, as per section 10.2(ii) above.

- 12.5.3. A flowchart of the process for disclosure to the Commissioner is included at **Appendix 4**. However, its website¹ should be consulted in each case for specific details of the correct reporting procedure to be followed.

13. DISCIPLINARY ACTION

- 13.1. The Gallery reserves the right to initiate disciplinary action in the event that:
- (a) disclosures are made other than in the reasonable belief that they tend to show (or in the case of disclosure to a nominated regulator, establish the substantial truth of) one or more Relevant Wrongdoings;
 - (b) any Worker is threatened, victimised, bullied, harassed, retaliated against or penalised by a colleague for raising a genuine concern (against the offending colleague); or
 - (c) any Worker conceals or covers up relevant wrongdoing, which is itself a disciplinary offence.
- 13.2. If a Worker is told not to disclose Relevant Information about a Relevant Wrongdoing, even by a person in authority, they should not agree to remain silent and if they make a disclosure, they will be afforded the full protection of this Policy.

14. CRIMINAL OFFENCES

- 14.1. A person commits a criminal offence under the Acts if they:
- a) hinder or attempt to hinder a Worker in making a report;
 - b) penalise or threaten penalisation, or cause/permit any other person to do so against a reporting person, a facilitator, a person connected to the reporting person who could suffer work related penalisation, or a legal entity the reporting person owns or works for or is otherwise connected with;
 - c) bring vexatious proceedings against anyone referred to at 14.2(b);
 - d) breach the duty of confidentiality regarding the identity of reporting persons;
 - e) knowingly make a false disclosure report; or

¹ Not yet live at the time of publication of this Policy

- f) fail to comply with the requirement to establish, maintain and operate internal reporting channels and procedures.
- 14.2. If an offence is committed by the Gallery with the consent of, or is attributable to, the neglect on the part of a director, manager or other officer, that person will also be liable for prosecution.
- 14.3. On conviction, fines up to €250,000 or imprisonment for up to 2 years, or both, may be imposed.

15. RECORDS AND REPORTING

- 15.1. The Head of Collections & Research shall maintain a confidential record of all disclosures raised and the outcomes and furnish a written report at the end of any investigation to the Director of the Gallery containing a description of the disclosure made and the outcome. The identity of the Worker shall only be included in this report if deemed absolutely necessary. All written records relating to a protected disclosure shall be retained for a period of three years. Access to such records shall be strictly limited to those who require access under this Policy.
- 15.2. An Annual Report will be submitted to Minister for Public Expenditure and Reform not later than 1 March in each year, in relation to the protected disclosures received in the preceding calendar year. The annual report will follow the prescribed contents set out in the Acts and will maintain the anonymity of all those involved.
- 15.3. The Gallery will also publish the Annual Report on its website by no later than 31 March each year in the form prescribed by the Acts.

16. PUBLICATION AND REVIEW

- 16.1. This Policy shall be made available on the Gallery's website and intranet.
- 16.2. This Policy shall be reviewed by the Gallery every two years and sooner, should amending legislation be introduced or minor amendments be required that warrant an earlier review.

Appendix 1

Comparison of Disclosure Channels²

8. Making a Protected Disclosure

Disclosure to	Employer (Internal report)	Prescribed person (External report)	Commissioner (External report)	Minister (Other)
Specific section(s) of the Act	5, 6, 6A	5, 7, 7A	5, 7, 10B, 10C	5, 8, 10D
Who does this apply to?	A worker of the employer. A worker of another employer where the wrongdoing relates solely/mainly to the conduct of that employer or for which the employer has legal responsibility.	A worker.	A worker.	A worker who is or was employed by a public body.
Conditions for protection under the Act	Came to attention in work-related context. Reasonable belief that information tends to show relevant wrongdoing.	Came to attention in work-related context. Reasonable belief that: <ul style="list-style-type: none"> Information tends to show relevant wrongdoing; Information and any allegations are substantially true; and Relevant wrongdoing relates to matter for which person is prescribed. 	Came to attention in work-related context. Reasonable belief that: <ul style="list-style-type: none"> Information tends to show relevant wrongdoing; and Information and any allegations are substantially true. 	Came to attention in work-related context. Reasonable belief that information tends to show relevant wrongdoing. Meets one of the following conditions: <ul style="list-style-type: none"> Has reported internally and/or externally but reasonably believes no action or insufficient follow-up action taken; Reasonably believes the Head of the public body concerned is complicit in the wrongdoing; Reasonably believes wrongdoing may constitute imminent or manifest danger to public interest.
Anonymous reports	Public bodies are required to accept.	Must accept unless prohibited by other legislation.	Must accept.	Must accept.
Method of reporting	In writing or orally or both (at choice of employer).	In writing and orally.	In writing and orally.	At choice of Minister.
Obligations on recipient	Acknowledge within 7 days. Diligently follow-up on information reported. Provide feedback within 3 months. Provide ongoing feedback at 3 month intervals (on request).	Acknowledge within 7 days, unless requested not to or to do so would jeopardise protection of reporting person's identity. Diligently follow-up on information reported. Provide feedback within 3 months (or 6 months in exceptional cases) Provide ongoing feedback at 3 month intervals (on request) Provide information on final outcome of any investigation triggered by report.	Acknowledge within 7 days, unless requested not to or to do so would jeopardise protection of reporting person's identity. Transmit the report within 14 days (or longer in exceptional circumstances) to: <ul style="list-style-type: none"> Such prescribed person(s) as the Commissioner considers appropriate; or Another suitable person (other than a prescribed person) as the Commissioner considers appropriate. If no prescribed person or suitable person can be identified, the Commissioner shall follow-up directly on the report in the same manner as a prescribed person.	Transmit the report to the Commissioner within 10 days of receipt. On receipt the Commissioner shall: <ul style="list-style-type: none"> Acknowledge within 7 days, unless requested not to or to do so would jeopardise protection of reporting person's identity. Transmit the report within 14 days (or longer in exceptional circumstances) to: <ul style="list-style-type: none"> Such prescribed person(s) as the Commissioner considers appropriate; or Another suitable person (other than a prescribed person) as the Commissioner considers appropriate. If no prescribed person or suitable person can be identified, the Commissioner shall follow-up directly on the report in the same manner as a prescribed person.

Figure 1. Comparison of disclosure channels

² Extracted from the DPER Guidance.

Appendix 2

Contents of an Internal Disclosure Report³

At a minimum, reports should include the following information:

- that the report is a protected disclosure and is being made under this Policy;
- the reporting person's name, position in the organisation, place of work and confidential contact details;
- 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 and if so, to whom, when, and what action was taken;
- information in respect of the alleged wrongdoing (what is occurring / has occurred and how) and any supporting information;
- the name of any person(s) allegedly involved in the alleged wrongdoing (if any name is known and the worker considers that naming an individual is necessary to report the wrongdoing disclosed); and
- any other relevant information.

³ Extracted from the DPER Guidance

Appendix 3

Flowchart for Prescribed Person Disclosure Process⁴

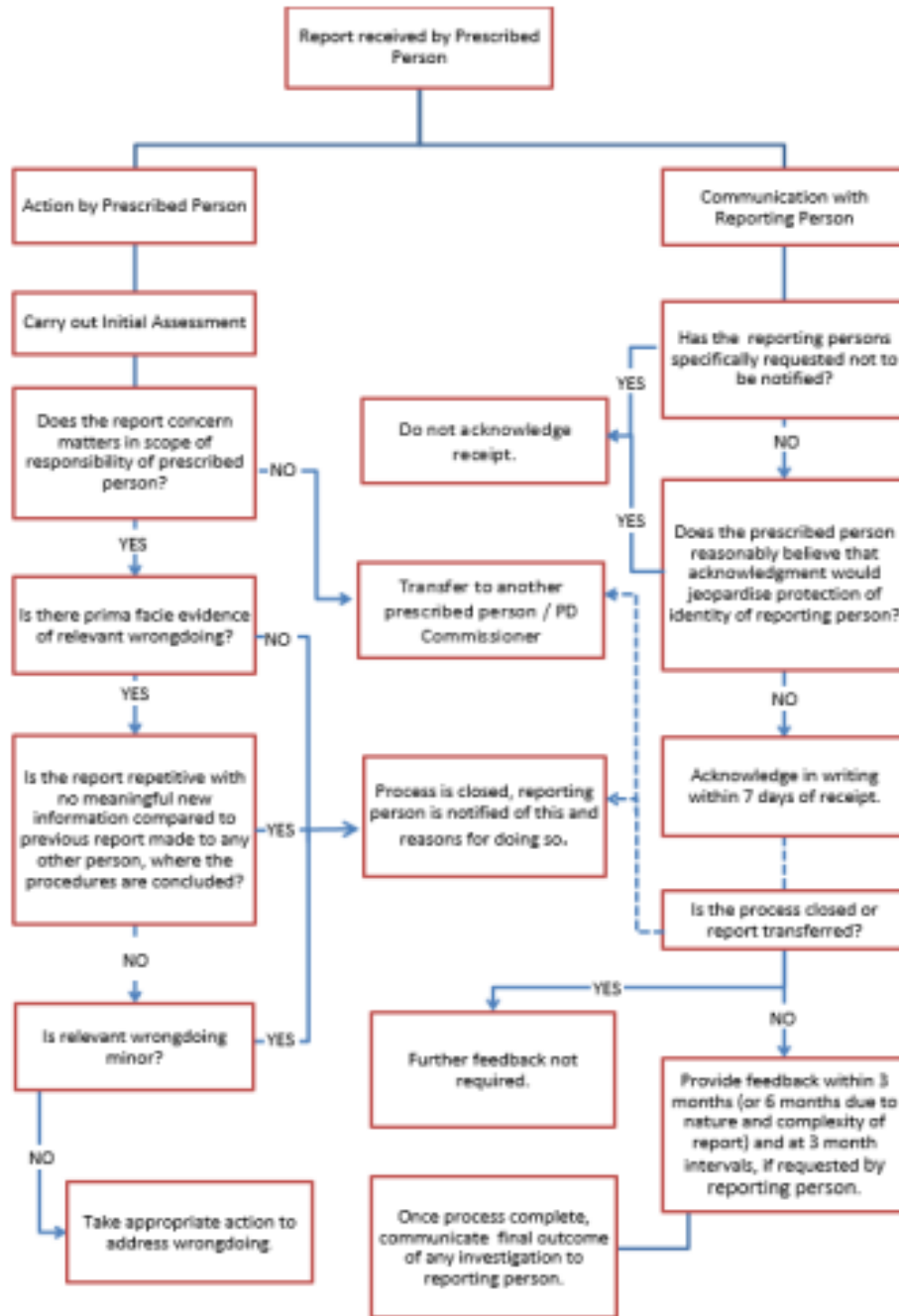


Figure 2: Flowchart for prescribed person process

⁴ Extracted from the DPER Guidance

Appendix 4

Flowchart for Protected Disclosures Commissioner Disclosure Process⁵

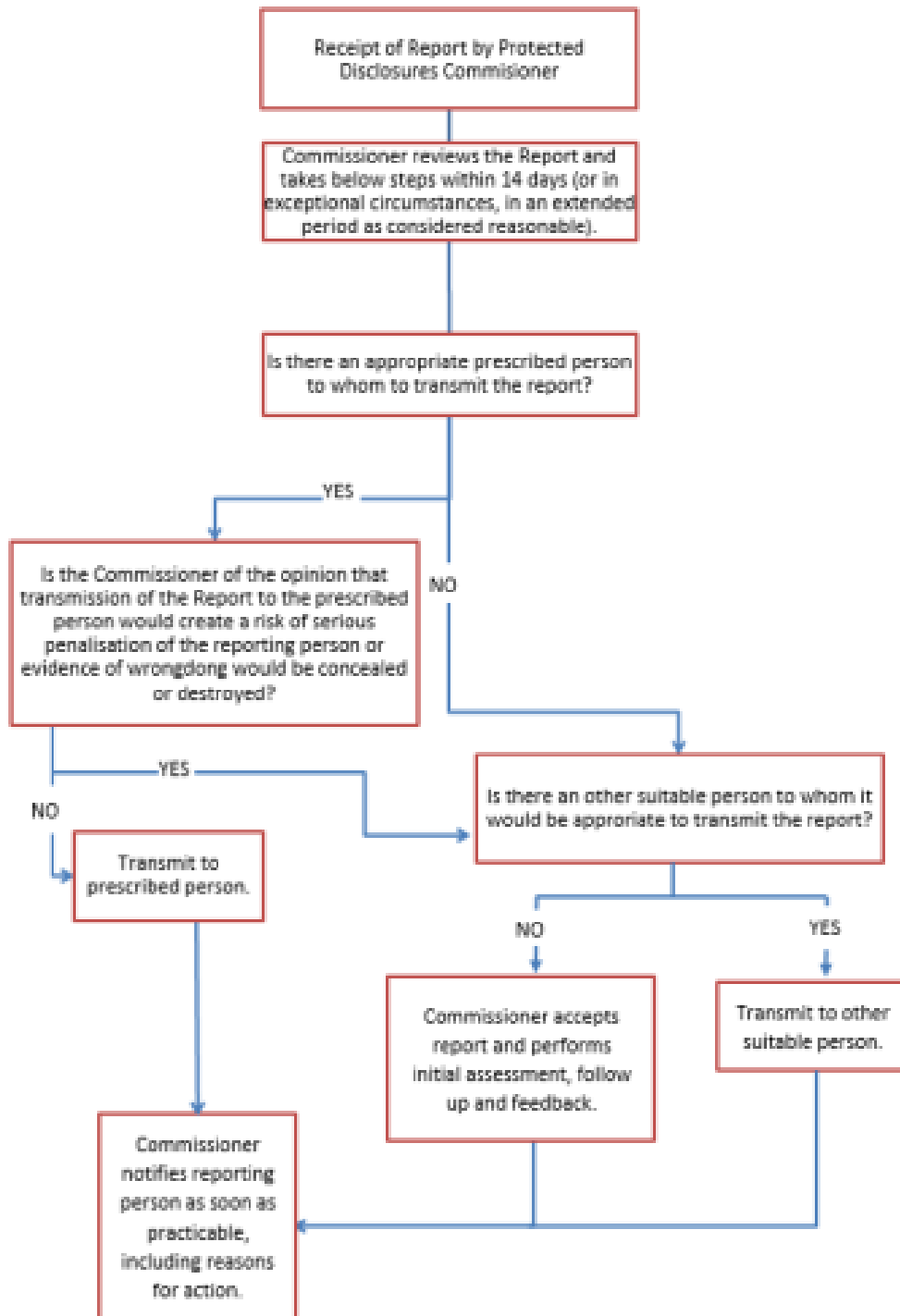


Figure 3: Flowchart for Protected Disclosures Commissioner process

⁵ Extracted from the DPER Guidance