

TEAGASC PROTECTED DISCLOSURES POLICY 2023

Address Queries to	Protected.Disclosures@teagasc.ie
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1. Introduction

Teagasc issued its Good Faith Reporting Policy in 2011. In 2014, the Protected Disclosures Act came into force and in response to this, and in accordance with section 5.9 of the Code of Practice for the Governance of State Bodies 2016, Teagasc updated its policy and re-issued it as the Protected Disclosures Policy (hereafter “this Policy”). This Policy is now updated to reflect amendments brought about by the Protected Disclosures (Amendment) Act 2022.

2. Policy Statement and Purpose

Teagasc is committed to the highest standards of openness, probity and accountability and recognises that current and former Authority members, employees and workers (together referred to as '**workers**' in this Policy) have an important role to play in achieving this objective. This Policy aims to give effect to the provisions of the Protected Disclosures Act 2014, as amended by the Protected Disclosures (Amendment) Act 2022, (the “**2014 Act**”) and is intended to encourage and enable workers to raise concerns which relate to wrongdoing which has come to the worker’s attention in a work-related context. Workers are aware of the ethical and good business standards expected of them through the Teagasc Code of Conduct, which is provided to each individual on their appointment. Workers should also have regard to the Code of Practice for the Governance of State Bodies, which sets out principles of corporate governance that State bodies, including Teagasc, are required to adopt.

Both Teagasc’s Code of Conduct Policy and the Code of Practice for the Governance of State Bodies are available on the WTnet at:

<https://teagasc.workvivo.com/spaces/31135/pages/corporate-governance> and on the corporate website at <https://www.teagasc.ie/about/corporate-responsibility>.

Where staff members have issues of concern, Teagasc operates an open door policy and staff members are encouraged to raise normal concerns and grievances directly with their line managers or through the steps set out in the Teagasc Grievance Procedure or the Dignity at Work Policy, which are available on the WTnet and in the Staff Handbook. This Policy is not intended to act as a substitute for normal day-to-day operational reporting or other internal employment procedures.

Teagasc aims to create a workplace culture that encourages the making of protected disclosures through the following measures:

- (a) Facilitating the disclosure of wrongdoing;
- (b) Encouraging workers to make protected disclosures at the earliest opportunity through Teagasc's internal reporting procedures;
- (c) Providing workers with guidance as to how to make protected disclosures;
- (d) Assisting, supporting and protecting workers who make protected disclosures;
- (e) Protecting a worker's identity in a manner consistent with the requirements of the 2014 Act;
- (f) Assessing any disclosure made, conducting an investigation where necessary, and addressing all findings that require attention;
- (g) Providing that workers are not to be penalised for reporting relevant wrongdoings; and
- (h) Taking appropriate action against workers who make disclosures without a reasonable belief in the truth of the disclosure.

Teagasc is committed to creating a workplace culture that supports the making of protected disclosures and provides protection for reporting persons. Matters to be considered under this Policy might relate to allegations about the management of Teagasc or about the activities of Authority members, managers, other staff members and workers, contractors, suppliers or customers, where such activities materially and adversely affect the work of these parties with Teagasc, or where alleged illegal or unethical acts may have been perpetrated or may be planned. Examples of such allegations include questions of financial malpractice, serious breaches of policies, appropriate and agreed procedures, significant departure from the statutory or other requirements for good governance, or other forms of wrongdoing set out in section 3 of this Policy.

It is also important to note that this Policy does not replace any legal reporting or disclosure requirements. Where statutory requirements and procedures exist, these must be fully complied with.

Overall responsibility for this Policy rests with the Director of Teagasc. Day-to-day responsibility for this Policy is delegated to the Chief Operations Officer.

This Policy may be revoked, replaced or amended at any time and workers will be informed of any changes that are implemented.

3. Application

This Policy applies to all current and former Authority members and 'workers', as defined in the 2014 Act, which includes: current and former employees; consultants; contractors; trainees; part-time, full-time and casual workers; volunteers; job candidates; board members; shareholders; and agency workers.

4. What is a protected disclosure?

A protected disclosure is defined in the 2014 Act as a disclosure of information which,
(i) in the reasonable belief of the worker tends to show one or more ‘relevant wrongdoings’,
(ii) came to the attention of the worker in a work-related context, and
(iii) is disclosed in the manner prescribed in the 2014 Act.

While individuals should exercise due care to ensure the accuracy of the information they disclose, a person who makes a report does not have to prove that a wrongdoing has occurred. The term “reasonable belief” does not mean that the belief has to be correct. A worker is entitled to be mistaken in their belief, and will not be penalised for being so mistaken, provided that their belief was based on reasonable grounds.

The following matters are “relevant wrongdoings”:

- (a) That an offence has been, is being or is likely to be committed;
- (b) That a person has failed, is failing or is likely to fail to comply with any legal obligation, other than one arising under the worker’s contract of employment or other contract whereby the worker undertakes to do or perform personally any work or services;
- (c) That a miscarriage of justice has occurred, is occurring or is likely to occur;
- (d) That the health and safety of any individual has been, is being or is likely to be endangered (normally, this should indicate a greater danger than is associated with the normal business of Teagasc, or a danger that is not usually associated with it);
- (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 has occurred, is occurring or is likely to occur, or
- (i) Information tending to show any matter falling within any of the preceding paragraphs (a) to (h) has been, is being, or is likely to be concealed or destroyed or an attempt has been, is being or is likely to be made to conceal or destroy such information.

It is immaterial whether a relevant wrongdoing occurred, occurs or would occur in Ireland or elsewhere and whether the law applying to it is that of Ireland or that of any other country or territory.

The information must come to the attention of the worker in a work-related context, but a disclosure of any wrongdoing which is the worker’s or the worker’s employer’s function to detect, investigate, or prosecute does not come within the scope of the 2014 Act.

If the person has a personal interest in the matter being reported, we ask that they advise of any interest at the outset as this may assist us when dealing with the issue.

Workers are not required or entitled to investigate matters themselves to find proof of their suspicion and should not endeavour to do so. All workers need to do, and should do, is disclose the information that they have, using the reporting procedure set out in section 6 of this Policy, based on a reasonable belief that it discloses a wrongdoing. Workers should also be satisfied that it is necessary to disclose all the information being provided in order to disclose that wrongdoing and should not access, process, disclose or seek to disclose, information about individuals that is not necessary for the purpose of disclosing the wrongdoing.

5. Protection for workers

This Policy is intended to encourage and enable staff members and others to raise serious concerns within Teagasc. A worker who makes a disclosure and has a “reasonable belief” of wrongdoing will not be penalised by Teagasc, even if the disclosure turns out to be unfounded. The motivation of the worker for making a disclosure is irrelevant when determining whether or not it is a disclosure protected by the 2014 Act. All disclosures will be dealt with appropriately regardless of the worker’s motivation for making the disclosure, and the worker will be protected so long as the worker reasonably believes that the information disclosed tended to show a wrongdoing.

Penalisation of workers who make a report will not be tolerated by Teagasc. Penalisation means any direct or indirect act or omission occurring in a work-related context, due to the making of a report, and which causes (or may cause) an unjustified detriment to a worker. Examples of penalisation may include suspension, lay-off, dismissal, demotion or loss of opportunity for promotion, transfer of duties, change in location of work, reduction in wages or changes in working hours, the imposition or administering of any discipline, reprimand or other penalty (including financial penalty), coercion, intimidation or harassment, ostracism, discrimination, disadvantage or unfair treatment, injury, damage or loss, threats 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 or financial loss, blacklisting on the basis of a sector or industry-wide informal or formal agreement, early termination of a contract for goods or services, cancellation of a licence or permit or psychiatric or medical referrals.

Any form of penalisation is prohibited and the fact that a type of penalisation is not specifically listed above does not mean that it cannot be penalisation under the 2014 Act.

Workers should ensure that they do not cause detriment to another person because the other person or a third party has made a protected disclosure. Detriment includes any act or omission referred to in the definition of penalisation above.

Workers who penalise or cause detriment to persons who have raised concerns under this Policy may be subject to disciplinary action. Workers should note that in some circumstances, where a detriment is suffered, the person who suffered the detriment could have a right to sue the worker personally for damages.

If a worker who has made a protected disclosure believes that they have suffered any such treatment, they should immediately inform one of the individuals referred to in section 6 of this Policy. If the matter is not remedied, the worker should raise it formally using Teagasc's Grievance Procedure.

A disclosure made in the absence of a reasonable belief will not attract the protection of the 2014 Act and may result in disciplinary action against the discloser. Further, disclosure of a

wrongdoing does not confer any protection or immunity on a worker in relation to any involvement they may have had in the wrongdoing.

A reporting person who believes that they may have been penalised may make a complaint to the Workplace Relations Commission and a claim of detriment may be made to the Courts, but Teagasc would ask that the worker first engage directly with Teagasc to resolve the issues in line with this Policy.

6. Reporting Procedure

If you discover information which you believe shows a relevant wrongdoing as provided for under this Policy, you should make a report to the designated person in the first instance. The name and contact details of the designated person(s) will be published on the WTnet and the public Teagasc website.

Alternatively, if you consider it is more appropriate, you may bring the issue directly to the attention of the Chief Operations Officer, Director, Chairperson of the Audit & Risk Committee or Chairperson of the Authority. These officers will then bring the details of the disclosure to the attention of the designated person, without delay. For the avoidance of doubt, this can include informing the designated person of the identity of the reporting person.

Teagasc has established internal reporting channels for the making of reports and for follow-up of said reports. The reporting channels are a dedicated means to allow disclosures be made by reporting persons to Teagasc and are distinct and separate from other lines of communication within Teagasc.

For the purposes of making reports, Teagasc has a dedicated email address with access to the email inbox limited to designated persons. Reports of disclosures should be made in writing via this email address (protected.disclosures@teagasc.ie). If requested by the reporting person, a verbal report can be made by way of meeting with the designated person. The contents of any disclosure will be kept secure and confidential and will only be available to the designated person or other members of their team or other appropriate persons, as required. For details regarding what information should be included in the report, please see Appendix A. The form that should be completed upon submission of a report is set out at Appendix B.

The designated person will bring the issue to the attention of the Chief Operations Officer (or in exceptional cases to the attention of the Director if in the opinion of the designated person the Chief Operations Officer may in any way be implicated in the issue which is the subject of the report). Where the designated person has found there to be *prima facie* evidence that a relevant wrongdoing may have occurred, in the normal course of events the Chief Operations Officer is responsible for overseeing the investigation and resolution of all reported disclosures and allegations and, at their discretion, shall advise the Director, Chairperson of the Audit & Risk Committee or Chairperson of the Authority, as considered appropriate. The Chief Operations Officer has direct access to the Chairperson of the Board and the Audit & Risk Committee, if required. If the designated person brings the issue to the attention of the Director because the designated person feels that the Chief Operations Officer may in any way be implicated in the issue then the Director will act in place of the Chief Operations Officer for the purpose of processing the specific issue under this Policy.

While the 2014 Act recognises that employees of Teagasc may also report their concerns to the Protected Disclosures Commissioner or the Minister for Agriculture, Food and the Marine, Teagasc requests that reports be made to the individuals referred to above in the first instance so that Teagasc can deal with the issues raised and, if necessary, investigate the matter.

Initial Assessment

The designated person will be responsible for receiving and following up on reports, maintaining communication with the reporting person and where necessary, requesting further information from and providing feedback to the reporting person. In a case of conflict, for example where the designated persons are implicated in the alleged wrongdoing, an alternative designated person can be appointed.

When a report of alleged wrongdoing is made to the designated person, the designated person will acknowledge, in writing, to the reporting person receipt of the report within seven (7) days of receipt.

The acknowledgement will provide further information about the protected disclosures process and enclose this Policy; provide information in relation to the protection of the identity of the discloser and protection from penalisation; and provide information in relation to feedback.

A screening process will then take place, which should involve an initial assessment of the disclosure to seek to determine if there is *prima facie* evidence that a relevant wrongdoing may have occurred. This initial assessment may not be solely carried out by the designated person but can be delegated to another authorised person, as appropriate. This assessment will be based exclusively on the information provided by the reporting person but the designated person may need to clarify certain information in order to carry out their initial assessment. However, for the avoidance of doubt, it is not intended at this initial stage that an investigation will be carried out in order to make a decision as to whether or not the report is a protected disclosure, and the initial assessment will be limited to whether or not there is *prima facie* evidence that a relevant wrongdoing may have occurred. If it is unclear whether a relevant wrongdoing may have occurred, Teagasc will generally err on the side of caution and treat the information as a protected disclosure (and protect the identity of the discloser) until satisfied that the information is not a protected disclosure.

It may also be necessary, as part of the screening process, to differentiate between protected disclosures and complaints exclusively affecting the worker and determine the appropriate procedure to be used. The report should be assessed to determine the nature of the information disclosed and the procedure or procedures that is / are most appropriate to be used to investigate the individual elements of the allegation. If, having assessed the report, it is deemed to relate solely to a complaint exclusively affecting the worker then the reporting person should be encouraged to utilise other processes (for example, Teagasc's Grievance Procedure, Disciplinary Policy, or Dignity at Work Policy) and will be told that the report will not be considered under the Protected Disclosures Policy. If, having assessed the report, there is a mix of different issues (some involving a protected disclosure, some involving a complaint exclusively affecting the worker) then the appropriate process / processes will be applied to deal with each of the issues

If the designated person determines that there is *prima facie* evidence that a relevant wrongdoing may have occurred, they will take appropriate action to address the relevant wrongdoing, having regard to the nature and seriousness of the matter concerned. The designated person undertaking the screening process should consider whether the possible relevant wrongdoing is serious or minor, whether it is something that can be investigated or not, and, if it can be investigated, what steps should be taken as part of such an investigation.

If the designated person concludes that there is *prima facie* evidence that a relevant wrongdoing may have occurred, they will examine what actions we need to take to deal with the matter.

This may only require an informal process which may involve simply clarifying certain matters, clearing up misunderstandings or resolving the matter by agreed action without the need for an investigation. In the course of an informal process, there may be occasions where said process is commenced but the person appointed to carry out the process identifies that the matter is more suitable for a formal investigation.

7. Investigation

If a formal investigation is required, the nature and extent of the investigation will be considered. This could consist of a more informal approach for less serious wrongdoings and a detailed and extensive investigation of serious wrongdoings. The obligation of confidentiality set out in section 8 below will also be respected in any investigation.

The Chief Operations Officer, in consultation with the Director and Chairperson of the Authority, may direct that the matter be investigated under the Teagasc Policy for Fraud Investigation or by the Internal Auditor or by other appropriate professionals either internally or externally.

It is not possible to prescribe precise timescales or steps required for investigations, as this will depend on the nature of the issue. However, Teagasc will ensure that any investigation be conducted in a timely manner. Teagasc will provide feedback to the reporting person within three (3) months of acknowledgement of receipt of the report of a disclosure, and at three (3) month intervals thereafter, if so requested. Reporting persons should note that the provision of feedback does not require a full investigation report to be provided after three (3) months but may consist of action taken or action expected to be taken to address the wrongdoing reported.

It should be noted that the requirement for confidentiality may prevent Teagasc from giving specific details of the investigation and/or any disciplinary action taken as a result. Workers should treat any information about the investigation as confidential.

7.1 Terms of Reference

For complex or serious investigations, it may be necessary to draw up Terms of Reference. Such Terms of Reference will give investigators scope to interview any witnesses and to review any documentation that they deem relevant. The scope and conduct of the investigation will not be unduly restricted by the Terms of Reference and the investigator will not be precluded from taking certain actions or examining further issues that may arise in the course of the investigation.

7.2 Fair Procedures

Where an allegation is made against an individual (the “Respondent”) the principles of natural justice and fair procedures will be complied with, as appropriate. The Respondent will have the right to know the allegations made against them and will also have the right to a fair and impartial hearing. These rights will be balanced against the reporting person’s right to have their identity protected as, under the 2014 Act, there are very limited cases where the identity of the reporting person may be disclosed to a Respondent. Where the identity of the reporting person cannot be disclosed to the Respondent, it may be possible for the Respondent to pose questions and challenge the evidence by way of an intermediary. In any case, whether the identity of the reporting person is known or not, the Respondent should be permitted to address the contents of the disclosure, and also to address an evidence or witness statements gathered as part of the investigation.

The Audit & Risk Committee of the Authority shall consider the management of all reported concerns or complaints regarding accounting practices, internal controls and financial practices

or auditing. The Chief Operations Officer shall immediately notify the Audit & Risk Committee of any such complaint and work with the Committee until the matter is resolved.

8. Confidentiality

Teagasc is committed to protecting the identity of the worker raising a concern and ensuring that relevant disclosures are treated in confidence. The 2014 Act provides that a person to whom a report is made or transmitted (including a designated person) shall not, without the explicit consent of the reporting person, disclose to another person the identity of the reporting person or any information from which the identity of the reporting person may be directly or indirectly deduced except where:

- (a) The person to whom the report was made reasonably considers the disclosure of information may be necessary for the purposes of the receipt or transmission of, or follow up on, reports as required under the 2014 Act;
- (b) The disclosure is a necessary and proportionate obligation imposed by European Union law 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;
- (c) The person to whom the report was made or referred shows that he or she took all reasonable steps to avoid so disclosing any such information;
- (d) The person to whom the report 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;
- (e) The person to whom the report was made or referred reasonably believes that disclosing any such information is necessary for The prevention of serious risk to the security of the State, public health, public safety or the environment, or
- (e) The disclosure is otherwise necessary as required by law.

Workers who are concerned that their identity is not being protected should notify one of the persons specified in section 6 of this Policy as soon as possible. Teagasc is committed to assessing or investigating, as appropriate, any such complaints and will take appropriate action where necessary.

All reasonable steps will be taken to protect the identity of the discloser. Where it is decided that it is necessary to disclose information that may or will disclose the identity of the discloser, the discloser will be informed of this decision in writing before the information concerned is disclosed, unless such notification would jeopardise:

- (a) the effective investigation of the relevant wrongdoing concerned,
- (b) the prevention of serious risk to the security of the State, public health, public safety or the environment, or
- (c) the prevention of crime or the prosecution of a criminal offence.

Any such notification will also include the reasons for the disclosure.

Raising a concern anonymously

Teagasc does not encourage workers to make disclosures anonymously. Proper investigation

may be more difficult or impossible if Teagasc cannot obtain further information from the reporting person. It is also more difficult to establish whether any allegations are credible. However, anonymous disclosures made by workers (although if anonymous, it may be difficult to establish if the disclosure is made by a worker) are not excluded from the protection of the 2014 Act and Teagasc will act upon such disclosures to the extent that this is appropriate and possible.

9. Communications with workers/Feedback

The points below summarise the communications that a worker can expect to receive following a disclosure.

- (a) Worker reports the disclosure to the designated person;
- (b) The designated person or other authorised person will issue a formal acknowledgement to the person making the report within seven (7) days of receipt of the report; The designated person or other authorised person will inform the reporting person of the action to be taken following (1) the initial assessment process and (2) the investigation;
- (c) In any event, Teagasc will provide feedback to the reporting person within three (3) months of acknowledgement of receipt of the report or, if no acknowledgment is sent, within three (3) months of receipt of the report; and
- (d) Where the reporting person requests in writing that they wish to receive further feedback after the initial three (3) month period then Teagasc will do so at intervals of three (3) months until the procedure relating to the report is closed.

Feedback is defined under the 2014 Act as the provision to the reporting person of information on the action envisaged or taken as follow-up and the reasons for such follow-up. Follow-up is 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.

When providing feedback Teagasc will ensure that no information is communicated that could prejudice the outcome of the investigation or any action that ensues.

Reporting persons should note that feedback is provided in confidence and should not be disclosed further by the reporting person, other than to their legal adviser or trade union representative, or unless the information forms part of a further protected disclosure being made by way of another channel.

There is no obligation on Teagasc to inform the reporting person of the commencement, progress or outcome of any disciplinary process involving another worker which may arise on foot of an investigation occasioned by a protected disclosure.

It should be noted that it may not be possible to inform the worker reporting the suspected wrongdoing of the precise action to be taken, where this would infringe a duty of confidence owed to someone else. The process will be as open as possible subject to these constraints.

Sometimes the need for confidentiality may prevent Teagasc from giving specific details of the investigation and/or any disciplinary action taken as a result. Workers should treat any information about the investigation as confidential.

Final Outcome

The final outcome of any investigations triggered by the report of the disclosure will be communicated in writing to the reporting person, subject to applicable legal restrictions concerning confidentiality, legal privilege, privacy and data protection or any other legal obligation. The full investigation report, however, may not be provided to the reporting person.

10. Review

The discloser may seek a review of the following:

- a) a decision made to disclose the identity of the discloser (except in exceptional circumstances);
- b) the conduct or outcome of any follow up actions (including any investigation) taken on foot of the receipt of the report; and/or
- c) the conduct or outcome of any investigation in respect into a complaint of penalisation.

A request for a review should be submitted within five (5) working days of the conduct, outcome or decision.

The worker applying for the review should set out, in writing, the reason(s) they are seeking a review and submit their application to the Head of Corporate Services & Procurement at Protected.disclosures@teagasc.ie

Any review will be undertaken by an appropriate reviewer who has not been involved in the initial assessment, investigation or decision.

The reviewer will be the person who is determined by Teagasc to be most appropriate and Teagasc may determine that this should be an internal or external person depending upon the circumstances.

Where a decision is taken to disclose the identity of the reporting person, Teagasc will not do so without the explicit consent of the reporting person, save where one of the exceptional circumstances set out in section 8 applies.

The role of the reviewer will not to be re-investigate the matter in question but to address specific issues the applicant feels have received insufficient consideration

Where a reviewer finds significant shortcomings or failings in the process, Teagasc will consider what further action(s) may or may not need to be taken in response to said findings

There is no entitlement to more than one review in respect of the same issue and the outcome of the review will be final.

11. Record Keeping

Any person to whom a report is made will keep a record of every report made to them, including anonymous reports. Where a meeting takes place in person, an audio recording of the meeting may be made by the person receiving the report, subject to the reporting person's consent. If the meeting is not audio recorded, minutes will be taken instead. The reporting person will be given the opportunity to check, rectify and agree by way of signing the transcript or minutes. As regards anonymous disclosures, the person receiving the report shall record the report in a manner they deem appropriate. Access to records relating to protected disclosures will be

strictly limited to those who require access in accordance with this Policy.

12. Data Protection

Teagasc will comply with all obligations arising under data protection legislation in respect of a protected disclosure, as well as the provisions of the 2014 Act in relation to data protection.

In accordance with these provisions, the right of access to personal data may be restricted in certain circumstances such as where if the request were granted, it would hinder reporting, or impede or frustrate follow-up or investigations, or would reveal the identity of the discloser or any person concerned. Any person affected by this restriction may bring a complaint to the Data Protection Commissioner.

All written records relating to a protected disclosure shall be retained in accordance with Teagasc's Data Protection Policy, available internally on the Policies, Procedures and Guidelines Register on WTnet.

13. Support

If any worker is finding any processes under this Policy stressful, they can contact Teagasc's employee assistance programme, which is run by the Spectrum Life. More information on the services and how to avail of them can be found at

<https://teagasc.workvivo.com/spaces/30989/pages/employee-assistance-programme> which is accessible directly while in the office, or on the Workvivo app while out of the office. The phone number is 1800 903 542 or staff can go to their live chat from the above link. The service is strictly confidential and is available 24/7, 365 days a year.

14. Annual Report

The 2014 Act provides that every public body, including Teagasc, shall prepare and provide to the Minister not later than 1 March in each year a report in relation to the immediately preceding calendar year in a form which does not enable the identification of the reporting person or persons involved. The report should contain information relating to the following matters:

- (a) the number of reports made to the public body;
- (b) in respect of each report, confirmation as to whether the relevant wrongdoing concerned was a breach;
- (c) the number of investigations and proceedings opened by the public body;
- (d) the number of investigations and proceedings closed by the public body, the outcome of the investigation or proceedings and the decision taken by the public body; and
- (e) the estimated financial damage and the amounts recovered following any investigations and proceedings.

Teagasc will prepare and publish a report on its website not later than 1 March each year in respect of the immediately preceding calendar year containing the following information:

- a) A statement confirming that Teagasc has in place internal and external reporting channels and procedures; and

- b) The information provided to the Minister contained in the above list.

15. Communication and Review

This Policy will be communicated to workers and workers are bound by the terms of this Policy. However, Teagasc reserves the right to review and amend this Policy when Teagasc determines this appropriate and workers will be informed of any such amendments.

If any worker wishes to receive clarification on this Policy and/or suggest improvements, they should contact the Chief Operations Officer.

APPENDIX A

Details that should be included in a disclosure

It is recommended that, at a minimum, disclosures should include the following details:-

- a. that the disclosure is being made under the Protected Disclosures Policy;
- b. the discloser's name, position in the organisation, 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 or not 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 (what is occurring/has occurred and how) and any supporting information;
- g. the name of the person(s) allegedly involved in the alleged wrongdoing (if any name is known and the worker considers that naming an individual is necessary to expose the wrongdoing disclosed); and
- h. any other relevant information.

APPENDIX B

Disclosure Form - Teagasc

This Form is to facilitate the making of Disclosures in accordance with the Teagasc Protected Disclosures Policy.

Before completing this form, you should:

1. Read the Protected Disclosures Policy carefully and consider whether what is being disclosed is a Disclosure and whether the Protected Disclosures Policy is relevant and applicable or whether it is a matter that should be raised with your Line Manager (for Teagasc staff members) or through the steps set out in the Teagasc Grievance Procedure or the Dignity at Work Policy, both of which are available on the WTnet and in the Staff Handbook. You should note that the Protected Disclosures Policy is not intended to act as a substitute for normal day-to-day operational reporting or other internal employment procedures.
2. Ensure that you have a **reasonable belief** that the information being disclosed tends to show one or more “relevant wrongdoings” (as defined on page 3 of the Protected Disclosures Policy) which came to your attention in a work-related context. Please note that disclosures must be made in good faith and relate to a matter that you have reasonable grounds to be concerned about.

Personal Details of the Person Making the Disclosure

Name: _____ Position: _____
Department/Programme: _____
Teagasc location: _____
Confidential contact details:
Telephone: _____ Email: _____
Do you want your identity protected? Yes/No _____

Details of the Disclosure

(Care should be taken to only include the name(s) of individual(s) directly relevant to the report.)

- a) Date of alleged Relevant Wrongdoing (if known) or Date the alleged Relevant Wrongdoing commenced or was identified: _____

- b) Is the alleged Relevant Wrongdoing still ongoing: Yes ___ No ___ Unsure ___
- c) Has the alleged Relevant Wrongdoing already been disclosed within Teagasc or externally and if so by whom, when and what action was taken?

- d) Details of the alleged Relevant Wrongdoing:

Please attach any supporting documentation when returning completed form.

- e) Name of any person(s) allegedly involved in the alleged Relevant Wrongdoing (if known): _____

- f) Any other relevant information.

Signature: _____ Date: _____

Completed forms and supporting documentation are to be returned to the following:

- To the Designated Person at protected.disclosures@teagasc.ie

APPENDIX C

Overview of Protected Disclosures Process in Teagasc

