



**National Library of Ireland**

**Protected Disclosures Policy**

## REVISION RECORD

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## 1. Introduction

The National Library of Ireland “the National Library” is committed to preserving the highest standards of integrity, transparency and accountability and recognises that our staff play a key role in achieving these aims. The National Library is committed to fostering an appropriate environment for addressing concerns relating to potential serious wrongdoing in the workplace and to providing the necessary support for staff and others working with us who raise concerns regarding such matters.

If you have a reasonable belief that a serious wrongdoing relating to the workplace has occurred, is occurring or is likely to occur, then you should make a disclosure by reporting this in the first instance to your Senior Manager – the member of the Leadership Team (“LT”) responsible for the department you are part of – setting out the basis for your belief. If your Senior Manager is not available or for any other reason you feel unable to raise the matter with your Senior Manager, then you may make a disclosure in writing to another member of the LT and copy to the Director.

The policy and procedures set out in this document will govern how such disclosures are dealt with.

One important aspect of the Policy is that workers who make disclosures based on a reasonable belief will be protected against penalisation. These protections will apply even if the worker’s concern is ultimately found to be misguided or mistaken, provided the disclosure was based on a reasonable belief. Any incidents of reprisal against a person making a report under this policy may be subject to action under the National Library’s Disciplinary Code. Equally, if it transpires that a worker makes a disclosure which they know to be false or do not believe to be true; the National Library may take disciplinary or other appropriate action.

The legislative framework for protecting workers against penalisation if they make disclosures is set out in the Protected Disclosures Act 2014. The Act came into effect on 15<sup>th</sup> July 2014 and can be downloaded at:

<http://www.oireachtas.ie/viewdoc.asp?fn=/documents/bills28/acts/2014/a1414.pdf>

The purpose of the Act is to provide a robust statutory framework within which workers can raise concerns regarding potential wrongdoing that has come to their attention in the workplace in the knowledge that they can avail of significant employment and other protections if they are penalised by their employer or suffer any detriment for doing so. The Act requires every public body to establish and maintain procedures for dealing with disclosures and to provide written information relating to these procedures to workers.

## 2. To whom does the Protected Disclosures Policy apply?

This policy is applicable to all workers in the National Library, including staff, contractors, consultants, agency staff, studentship holders and interns.

### 3. Key principles underlying the Policy

A worker who has a reasonable belief that a serious wrongdoing relating to the workplace has occurred, is occurring or is likely to occur, should disclose this. A worker who makes a protected disclosure is protected from penalisation (or threatened penalisation), such as suspension, lay-off or dismissal, demotion, reduction in wages, harassment, threat of reprisal, loss or other unfair treatment.

A worker who has a **reasonable belief** that the information contained in his or her disclosure shows or tends to show that wrongdoing covered by this policy has occurred, is occurring or is likely to occur, will be protected against penalisation even if the worker's concern is ultimately found to be misguided or mistaken.

Where concerns are raised, the following principles will be applied by the National Library:

- the concern will be treated seriously and investigated where that is considered appropriate
- Where an investigation takes place, the identity of the person raising the concern will be safeguarded insofar as this is practically possible.
- the person raising the concern will be advised on how the issue has been addressed, including the outcome of any investigation
- The person raising the concern will not be disadvantaged in any way for having made the disclosure, even if no wrongdoing is identified **provided the concern was based on a reasonable belief**. The National Library's assessment of whether a concern was based on a reasonable belief will be based on how a reasonable person would respond to the information available to him or her at the time that the disclosure was made.

Incidents of reprisal against a person making a report under this policy may be subject to action under the National Library's Disciplinary Code.

The National Library will take all reasonable steps to treat disclosures in a confidential and sensitive manner. The National Library will not disclose the worker's identity without their consent, unless it is required by law or necessary for the effective investigation of the relevant wrongdoing.

An employee who inappropriately discloses details that could establish the identity of a worker who makes a protected disclosure may be subject to action under the National Library's Disciplinary Code.

If a worker believes that he/she has been penalised for making a disclosure of wrongdoing, they should inform the Director or Chair of the Board to seek redress.

### 4. What is a "Protected Disclosure"?

A Protected Disclosure is the disclosure of '*relevant information*'. To qualify as relevant information:

- A worker must reasonably believe that the information disclosed tends to show one or more 'relevant wrongdoings' – see Section 5 below.
- The wrongdoing must come to the worker's attention in connection with his or her employment. For example, a disclosure will not be protected if it relates to matters in someone's personal life outside and unconnected to the workplace.

## **5. What type of disclosure is covered by the Policy?**

A disclosure of information is covered by this Policy if the worker has a reasonable belief that a 'relevant wrongdoing' is occurring or is likely to occur. Relevant wrongdoings include:

- criminal offences;
- failure to comply with legal obligations;
- miscarriages of justice;
- endangering an individual's health or safety;
- causing significant damage to the environment;
- unlawful or improper use of funds or resources of a public body;
- fraudulent activity;
- an act or omission by or on behalf of a public body which is oppressive, discriminatory, grossly negligent or constitutes gross mismanagement; and
- Concealment or destruction of evidence relating to matters of importance such as the above.

## **6. What type of disclosure is not covered by the Policy?**

The aim of this policy is to assist and support workers in speaking out about potential wrongdoing such as that listed in section 5 above that has come to their attention in the workplace.

It is NOT intended to act as a substitute for normal day to day operational reporting.

Disclosures made anonymously are NOT covered by this Policy.

The protections available under this policy will NOT apply in the case of 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 National Library reserves the right to take disciplinary or other appropriate action.

The Policy does NOT cover personal complaints or personal grievances. Complaints and grievances should be handled through the National Library line management system in accordance with Human Resource policies and escalated appropriately. Further information on procedures for dealing with personal grievance problems is available on the Department of Public Expenditure's website at <http://hr.per.gov.ie/grievance>.

## **7. When should a worker make a disclosure?**

A worker should make a disclosure if, in their reasonable belief, any of the wrongdoings outlined in section 5 has occurred, is occurring or is likely to occur or if there has been a breach of National Library policy.

## 8. Making a disclosure

The Protected Disclosures Act 2014 provides for five avenues of disclosure:

- to an employer or other responsible person;
- to a prescribed person (a link to the list of Prescribed Persons is given under Part 11)
- to a Minister (in the case of the National Library this is the Minister for Culture, Tourism, Arts, Gaeltacht, Sports & Media);
- to a legal adviser; or
- alternative external disclosures.

The Act sets out the different requirements that need to be met for each of these avenues of disclosure. The Guidance issued by the Department of Public Expenditure makes it clear that it is preferable in most circumstances to disclose to the employer (i.e. the National Library) and, if that is not appropriate, to one of the other disclosure options listed above.

This Policy deals with the first of these avenues, that is, making a disclosure to an employer or other responsible person.

The National Library has put in place a Protected Disclosures Group (“PDG”), the members of which have been assigned as the National Library's Designated Recipients. The PDG will oversee the process of dealing with disclosures and will provide details of disclosures to the Director as they are received and subsequently as they are being dealt with.

Any worker who has a reasonable belief that a serious wrongdoing has occurred or is about to occur should disclose the relevant information to their Senior Manager in the first instance. If your Senior Manager is not available to receive your disclosure or if for any other reason you feel unable to raise the matter with your Senior Manager, then you may make a disclosure in writing to an LT member and copy to the Director.

It is also open to workers to make a disclosure directly to the PDG or the Director in the first instance, if they wish.

Senior Managers, the Director or other potential recipients of a disclosure will refer the potential protected disclosure made to the PDG.

If the disclosure concerns the Director or an external Committee Member, the disclosure should be made directly to the Chair of the PDG who will report any such disclosures to the Chair of the Board. If the disclosure concerns a Board Member, the National Library suggests that the disclosure is reported outside of this procedure using one of the four alternative avenues of disclosure, as appropriate.

In all cases, the specific nature of the potential wrongdoing should be communicated at the time the disclosure is first made. The disclosure should be made in writing to ensure that all the relevant information is made available at the time the disclosure is first made.

A worker intending to raise a concern should not carry out an investigation with a view to seeking to confirm any perceived wrongdoing.

## 9. Protected Disclosures Group

The Board of the National Library is ultimately responsible for the management of this policy however the Board has delegated responsibility for the maintenance and day-to-day operation of this policy to the PDG. The PDG is authorised to act for the National Library in response to a disclosure.

The members of the PDG shall be:

- The Chair of the Audit Committee;
- The Head of Human Resources; and
- The Head of Finance.

In the event that a disclosure concerns a member of the PDG, that PDG member will not serve on the PDG while it is reviewing that disclosure.

## 10. Procedures for dealing with disclosures

There are two stages in the procedures for dealing with disclosures, the “Initial Evaluation” Stage and – where appropriate – the subsequent “Full Investigation” Stage. The purpose of the Initial Evaluation is to establish if the matters reported fall within the scope of the Policy and if they do, whether the matters reported are sufficiently serious to merit a full investigation.

At all points in the process, the recipient of a disclosure under this policy and any other person to whom the disclosure is referred in the performance of that person’s duties, must take all reasonable steps to avoid disclosing to another person any information that might identify the person by whom the disclosure was made.

### Initial Evaluation Stage

In the case of disclosures to people other than members of the PDG, the initial recipient will advise the PDG in writing that he or she has received a disclosure and will provide details of the nature of the information contained in the disclosure.

**As it is not possible to know at the time of disclosure whether a disclosure will subsequently be deemed protected under the Protected Disclosures Act, the recipient should keep a written record of his/her actions, including timelines, in dealing with the disclosure.**

The PDG will refer disclosures in the first instance to the LT member responsible for the area in question for an initial evaluation to be undertaken either by them or another LT member.

In the course of the Initial Evaluation Stage, the LT member should:

- (a) Record the disclosure and the steps taken to deal with it.
- (b) Clarify the basis of the concerns raised with the worker.
- (c) Establish what evidence is available to support the concern.
- (d) Carry out relevant enquiries promptly, sensitively and discretely, taking all reasonable steps to protect the identity of the maker of the disclosure. If it is necessary to reveal the worker’s identity to undertake an effective enquiry, consult with the worker.

The initial evaluation as to whether the matter requires an investigation is to be completed within 10 working days. If the LT member concludes that no further investigation is required, he or she will



advise the discloser of this and advise the basis for this conclusion, insofar as is possible. The LT member will also advise the PDG of this and the basis for reaching their conclusion.

If the discloser is not satisfied with a decision not to proceed to an investigation, he or she may outline to the PDG the reasons why he or she considers that the matter requires investigation. The PDG will then undertake an independent evaluation of the matter following which he or she will advise the discloser and the LT member within 10 working days as to whether a more detailed investigation is appropriate. A decision of the PDG not to pursue the matter will represent a final internal decision on the matter.

Where they consider it appropriate to do so, the PDG may undertake an independent evaluation of the matter without referring it for evaluation to the relevant LT member in the first instance; the same Initial Evaluation procedures and notification timelines will apply.

If the disclosure concerns the Director or an external Committee member: the matter will be disclosed directly to the Chair of the PDG, who will report on the disclosure and the progress of any investigation to the Chair of the Board.

### Full Investigation Stage

Where an investigation is required, a full investigation must be immediately initiated. The main purpose of the investigation is to assess whether the disclosure is based on a reasonable belief and grounded, based on a reasonable belief but ungrounded or is a deliberately false report

Depending on the nature of the disclosure, the PDG may decide to conduct the investigation themselves or may consider referring the matter to a LT member for investigation if they consider that that is more appropriate. Advice, if required, should be taken from the Director.

The initiation of an investigation must be reported to the Director by the PDG within 3 working days. The PDG must also advise the Director of the outcome and any recommendations arising out of any investigation within 3 working days of the conclusion of the Investigation Stage.

Any investigation arising as a consequence of a disclosure will be carried out in a manner which has full regard to the principles of natural justice. The discloser will be advised of the progress and outcome of the investigation, including any proposed action, within 10 working days of the conclusion of the Investigation Stage, having regard to the nature of the matters investigated.

It is not possible to lay down precise timescales or steps required for investigations, as this will depend on the nature of the issues raised. Without affecting the quality or depth of the investigation, all reasonable speed will be taken to bring any investigation arising from the making of a disclosure by a worker to a conclusion as speedily as possible.

If, following the investigation into the matter, no wrongdoing is found to have occurred and the discloser is assessed not to have had a reasonable belief in making the allegation of wrongdoing, the details of the case will be referred to the Director and the Head of Human Resources with a view to considering whether disciplinary proceedings ought to be pursued against the person concerned.

In summary, when undertaking a full investigation, the PDG or other LT member / Investigating Officer assigned should:

- (e) Record the disclosure and the steps taken to deal with it.
- (f) Clarify the basis of the concerns raised with the worker.
- (g) Establish what evidence is available to support the concern.
- (h) Obtain evidence from any relevant witnesses.
- (i) Risk-assess the issue and take immediate action if the alleged wrongdoing involves a serious loss or danger to others.

- (j) Carry out relevant enquiries promptly, sensitively and with discretion, taking all reasonable steps to protect the identity of the maker of the disclosure. If it is necessary to reveal the worker's identity to undertake an effective enquiry, consult with the worker.
- (k) Assess whether the disclosure report is based on a reasonable belief but ungrounded, based on a reasonable belief and grounded or a deliberately false report.
- (l) Recommend appropriate action if the disclosure is grounded.
- (m) If the disclosure is deliberately false consider action under the National Library's Disciplinary Code.
- (n) Report the outcome and forward all records to the Director within 3 working days of the conclusion of the Investigation Stage.
- (o) Provide written feedback to the worker within 10 working days of the conclusion of the Investigation Stage, including any proposed action.

## 11. Records

Records of concerns raised, including the outcome, will be maintained for a minimum of five years after the closure of the case by the Director. These records will be maintained in a confidential and secure environment.

A summary report on all protected disclosures will be included in the National Library's Annual Report.

## 12. Further Information / Review of Policy

The policy will be reviewed when the Department of Public Expenditure & Reform provides guidance as outlined in Section 21 of the Act and periodically thereafter or when required by the Board of the National Library.

[Protected Disclosures Act 2014](#)

[Protected Disclosures \(Amendment\) Act 2022](#)

[List of Prescribed Persons](#)

[Code of Practice: Grievance and Disciplinary Procedures S.I. No.146 of 2000](#)

[Workplace Relations Service](#)

## 13. Contact Details of the Protected Disclosures Group

The contact details for the Designated Recipients are:

Designated Recipient	Email
Audit Committee Chair	<a href="mailto:pdgchair@nli.ie">pdgchair@nli.ie</a>
Head of Human Resources	<a href="mailto:pdg@nli.ie">pdg@nli.ie</a>
Head of Finance	<a href="mailto:pdg@nli.ie">pdg@nli.ie</a>
Email Group:	<a href="mailto:pdg@nli.ie">pdg@nli.ie</a>



National Library of Ireland

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## Protected Disclosures Policy - Checklists

### Checklist A:

**Guidance on the initial receipt of disclosures**

### Checklist B:

**Guidance for investigation of disclosures**

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NLI - Protected Disclosures Policy – Checklists	NLI-FORM-006	Board	20 April 2017	Final

## **Appendix A:**

### **Guidance on the initial receipt of disclosures**

This Appendix provides guidance for Senior Managers in the National Library of Ireland (“the National Library”) who are approached with disclosures alleging serious wrongdoing. The main objective of the Protected Disclosures Act 2014 (“the Act”) is to protect workers from penalisation for having made a disclosure in accordance with its provisions. The National Library’s Protected Disclosures Policy (“the Policy”) reflects the provisions and intent of the legislation.

#### **Your task as the initial recipient: Initial Evaluation**

It is not possible to determine at the point of disclosure whether the discloser will subsequently report that they have been penalised for having raised the matter. For that reason, it should be borne in mind that a person reporting serious wrongdoing to you may not characterise their report as potentially being a protected disclosure.

The Policy makes a clear distinction between an initial evaluation and a full investigation. The initial evaluation will consist of two separate elements – an assessment as to whether the matters reported fall within the scope of the Policy and an assessment as to whether the matters reported are sufficiently serious to merit a full investigation.

The Policy mirrors the matters listed as wrongdoings in the Act. They are broad and wide ranging in nature and are all considered being serious matters. In many cases there is no requirement for an actual event to have occurred: the possibility of occurrence may be sufficient.

Not all matters brought to your attention may merit a full investigation. Examples of where an investigation may not be required include cases where the officer reporting to you does not have access to all of the relevant facts or where a simple misunderstanding has arisen.

If it is concluded that a full investigation is not necessary, it is important that the evaluation leading to that conclusion is sufficiently robust to enable the basis of that decision to be communicated to the discloser.

#### **Confidentiality**

The Act and the Policy recognise that it may not always be possible to completely protect the identity of the discloser. The National Library, however, has a responsibility to safeguard the identity of the discloser insofar as is practically and pragmatically possible. It is therefore important to ensure that any consultation engaged in is carried out in a discreet and careful manner and that all reasonable steps are taken to maintain the confidentiality of the identity of the discloser. If it is necessary to reveal the worker’s identity to undertake an effective enquiry, it is essential to first consult with the worker.

It is also important to note that in accordance with the Act a failure to comply with this requirement is actionable by the person by whom the disclosure was made if that person suffers any loss by reason of the failure to comply.

### Keeping the discloser informed

A vital element in the provision of assurance that the disclosure will be taken seriously is open and honest communication.

It is important to explain that the initial evaluation does not involve a full investigation and that the discloser is not disadvantaged in any way for having made a disclosure based on a reasonable belief even if no wrongdoing is identified.

While there is a clear necessity to draw attention to the consequences of making a disclosure not based on a reasonable belief, an over emphasis on this aspect could potentially discourage persons from making reports of wrongdoing. Such an outcome would be contrary to one of the main purposes of the Policy which is to encourage workers to speak up about wrongdoing.

### Initial Recipient of a Disclosure – checklist

1.	Have you read and familiarised yourself with the content of the National Library's Protected Disclosures Policy?	<input type="checkbox"/>
2.	Have you taken particular note relating to your responsibilities concerning the avoidance of the disclosure of information that might identify the person by whom the disclosure was made?	<input type="checkbox"/>
3.	Have you given a copy of the Policy to the discloser and advised them that their concerns will be treated seriously?	<input type="checkbox"/>
4.	Has the discloser adequately demonstrated to you that the matters he/she is raising fall into one of the categories set out in section 5 of the Policy?	<input type="checkbox"/>
5.	If the answer to question number 4 is 'NO' have you advised the discloser that the subject matter of the disclosure must refer to one of the matters set out at section 5?	<input type="checkbox"/>
6.	If the answer to question number 4 is 'YES' have you advised the discloser that you will carry out an initial evaluation and revert with an indication as to whether, in your view, the matter requires a full investigation?	<input type="checkbox"/>
7.	Have you explained the difference between an initial evaluation and a full investigation?	<input type="checkbox"/>
8.	Have you explained to the discloser that if he/she is not happy with the outcome of your evaluation he/she can refer the matter to another LT member and that the other LTmember will conduct his/her own independent evaluation?	<input type="checkbox"/>
9.	Have you explained that in the event of a conclusion that an investigation is required the matter will be investigated and that this may be referred to another LT member or the PDG for investigation if considered more appropriate?	<input type="checkbox"/>
10.	Have you explained to the discloser the limits on confidentiality as set out in the Protected Disclosures legislation?	<input type="checkbox"/>
11.	In the event that you have arrived at the view that an independent investigation is not appropriate have you advised the discloser, in so far as is possible, the basis for arriving at that conclusion?	<input type="checkbox"/>
12.	Have you formally advised the Director of the receipt of the disclosure, the nature of the information contained therein, the outcome of your evaluation and the name of the LT member to whom the matter was referred for investigation, if appropriate?	<input type="checkbox"/>

## Appendix B:

### Guidance for investigation of disclosures

This Appendix provides guidance for members of the Leadership Team (“LT”) or other Investigating Officers as nominated by the Protected Disclosures Group (“PDG”) in the National Library of Ireland (“the National Library”) who are responsible for investigating alleged serious wrongdoing under the Protected Disclosures Act 2014 (“the Act”). The Act provides protection for workers from penalisation by their employer for having made a disclosure in accordance with its provisions. The National Library’s Protected Disclosures Policy (“the Policy”) reflects the provisions and intent of the legislation.

#### Your task as the investigator

Your first task is to confirm with the PDG they have advised the Director of the receipt of the disclosure, the nature of the information contained in the disclosure and the decision transmitted to the discloser. Following that, you must advise the Director that the investigation is underway.

Insofar as you may wish to consult with the LT member who may have passed the disclosure to you for investigation it is important that you arrive at your own independent conclusions in relation to the matter under investigation.

The manner in which you conduct your investigation is one for determination by you having regard to the particular circumstances of the case. This is however subject to two very important considerations:

- *The issue of confidentiality* - The Act and the National Library’s Policy recognise that it may not always be possible to completely protect the identity of the discloser. You do however have a responsibility to safeguard the identity of the discloser insofar as is practically and pragmatically possible. It is therefore important to ensure that you take all reasonable steps to maintain the confidentiality of the identity of the person who made the disclosure of wrongdoing. If it is necessary to reveal the worker’s identity to undertake an effective enquiry, consult with the worker.

It is also important to note that in accordance with the legislation a failure to comply with this requirement is actionable by the person by whom the disclosure was made if that person suffers any loss by reason of the failure to comply.

- *Fair investigatory procedures* – The Policy of the National Library makes it clear that any investigation arising as a consequence of a disclosure will, as with all other internal investigations, be carried out in a manner which is fully consistent with the principles of natural justice. Remember that in addition to your responsibility to the discloser you also have a responsibility to ensure that accusations of wrongdoing, which could potentially prove to be incorrect, are not made against innocent persons.

Should you require any particular guidance in relation to fair procedures it is suggested that you seek advice from the HR Unit.

### **Keeping the discloser informed**

Regular communication with the discloser is a vital element in the provision of assurance that the disclosure will be taken seriously.

You should take the time to explain your role in the process as set out in the Policy and the nature of the investigation you will undertake. You should also make it clear that an underlying principle of the Policy is that the discloser is not disadvantaged in any way for having made a disclosure based on a reasonable belief even if no wrongdoing is identified. This would also be an appropriate time to discuss the limits on confidentiality as set out in the legislation.

While there is a clear necessity to draw attention to the consequences of making a disclosure not based on a reasonable belief, an over emphasis on this aspect could potentially discourage persons from making reports of wrongdoing. Such an outcome would be contrary to one of the main purposes of the Policy which is to encourage workers to speak up about wrongdoing.

If your investigation is taking some time you should provide the discloser, in so far as is possible and appropriate, with regular updates of progress.

### **Upon completion of your investigation**

Regardless as to the nature of your findings you are required under the Policy to advise the Director of the outcome of your investigation. You also need to advise the discloser of the outcome.

Where you have arrived at a conclusion that the discloser was not fully aware of all the facts or was genuinely mistaken in their belief of the occurrence or likely occurrence of wrongdoing it is especially important to explain the basis of your finding to the discloser. As a discloser has a right under the legislation to disclose the information elsewhere a failure on your part to adequately explain matters may lead to such an outcome.

In a case where you have arrived at a conclusion that the discloser did not make his or her disclosure based on a reasonable belief – in other words the disclosure was made for frivolous or vexatious reasons – you should advise the Director and the Head of Human Resources who will consider whether disciplinary proceedings ought to be pursued against the person concerned.

The making of a disclosure and subsequent investigation is a serious matter. You should carefully record all of the steps you have taken during the course of your discussions with the discloser and during the course of your investigation. A checklist has been prepared for your guidance which you should sign and maintain for your records. As there are no time limits set out in the legislation or the Policy it is important that you maintain your records until such time as all matters connected with the disclosure have been disposed of to your satisfaction.

## Investigation of a disclosure – checklist

1.	Have you read and familiarised yourself with the content of the National Library's Protective Disclosure Policy?	<input type="checkbox"/>
2.	Have you taken particular note relating to your responsibilities concerning the avoidance of the disclosure of information that might identify the person by whom the disclosure was made?	<input type="checkbox"/>
3.	Have you met with the discloser and advised them that their concerns will be treated seriously?	<input type="checkbox"/>
4.	Have you confirmed with the original recipient (if this is a different person) that he or she has advised the Director of the receipt of the disclosure, the nature of the information contained therein, the outcome of his or her initial evaluation and the fact that the matter has been referred to you for investigation?	<input type="checkbox"/>
5.	Have you advised the Director that the investigation has commenced?	<input type="checkbox"/>
6.	Have you advised the discloser that you will keep him/her advised of the progress of the investigation as appropriate and that when your investigation is completed you will advise him/her of the outcome of that investigation?	<input type="checkbox"/>
7.	Have you explained to the discloser the limits on confidentiality as set out in the Protected Disclosures legislation?	<input type="checkbox"/>
8.	Have you explained to the discloser that if he or she is not happy with the outcome of your investigation that there are alternative disclosure avenues open to him or her?	<input type="checkbox"/>
9.	Are you familiar with procedures for conducting an investigation taking account of the principles of natural justice?	<input type="checkbox"/>
10.	Have you advised the discloser of the outcome of your investigation and explained, insofar as is possible, the reasons for your decision?	<input type="checkbox"/>
11.	If you arrived at the conclusion that in making his or her disclosure the discloser did not have a reasonable belief in the wrongdoing have you referred the matter to the Director and to the Head of Human Resources for further attention?	<input type="checkbox"/>
12.	Have you formally advised the Director of the outcome of your investigation?	<input type="checkbox"/>