



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem

Internal Disclosures Policy

September 2024

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1. Introduction

Policy Statement

The Central Bank of Ireland (the Bank), acting through the Commission, is committed to the principle of accountability and to developing a workplace culture where workers are encouraged to raise their concerns about what is happening at work if they have a reasonable belief that a serious matter has taken place, or, is likely to take place in a work related context.

Part 1 of the Internal Disclosures Policy (the “Policy”) deals with protected disclosures¹ as defined in the Protected Disclosures Act 2014 (the “2014 Act”) and confirms that any person who makes a protected disclosure will be protected from unfair dismissal or other forms of penalisation as a result of having made the protected disclosure.

Every disclosure of wrongdoing made in accordance with Part 1 of this Policy will be taken seriously and the reporting person will receive appropriate protection from dismissal and/or penalisation. Information disclosed will be assessed by the Internal Audit Division (IAD). IAD may determine that the subject matter of the disclosure does not fall within the scope of the 2014 Act, in whole or in part, and may determine that it should be addressed, in whole or in part, through other established mechanisms within the Bank (such as the Grievance Procedure). If a disclosure falls within the scope of the 2014 Act², and if an investigation is deemed necessary, it will be investigated appropriately under this Policy. The identity of the worker who made the disclosure will be protected and not disclosed other than in accordance with the provisions of the 2014 Act³. The worker will not be penalised for disclosing information that the worker reasonably believes tends to show one or more “relevant wrongdoings”⁴.

Part 2 deals with ethical concerns and confirms that if a worker suspects a breach of the Bank’s ethical requirements they should report it and they will not be penalised for having done so. Ethical requirements are set out in, among others, the Bank’s Code of Ethics and associated policies (Policy on Staff Trading and Financial Assets; Policy on Receipt of Business Hospitality and Gifts; and Policy on Managing Staff Conflicts of Interest).⁵

¹ As defined in section 5 of the 2014 Act.

² i.e. It relates to a “relevant wrongdoing”, per section 5(3) and (5) of the 2014 Act.

³ Per section 16 of the 2014 Act.

⁴ “Relevant wrongdoing” shall be construed in accordance with section 5(3) and (5) of the 2014 Act.

⁵ The Code of Ethics and associated policies give effect to the requirements of the Guideline (EU) [2021/2253] of the European Central Bank of 2 November 2021 laying down the principles of the Eurosystem Ethics Framework (ECB/2021/49) (recast) and the Guideline (EU 2021/2256) of the ECB of 2 November 2021 laying down the principles of the Ethics Framework for the Single Supervisory Mechanism (ECB/2021/50) (recast).

2. Purpose

This policy is in place to encourage workers to come forward and raise an issue within the Bank and to provide reassurance that their report will be taken seriously and dealt with by the Bank in an appropriate manner. This Policy aims to:

- Encourage workers not to overlook serious concerns and to feel safe raising them;
- Reassure employees that they will be protected from unfair dismissal or penalisation (and reassure other workers, such as contractors, that they will not be subjected to detrimental treatment by the Bank) for making a disclosure; and
- Highlight that the earlier a concern is raised, the easier it is for the Bank to make appropriate enquiry and take effective action.

3. Matters that are out of Scope

This Policy is not an avenue for normal day to day operational reporting or a substitute for internal employment procedures. In particular, this Policy does not replace procedures for addressing interpersonal grievances or conflicts or complaints exclusively affecting an individual's terms and conditions of employment. If you have concerns in these areas, you should consult the Bank's Grievance Procedure, Dignity at Work Policy, or your line manager.

Part 1: Important Information about Making a Protected Disclosure

The [2014 Act](#) was enacted to empower workers to speak up about wrongdoing in their workplace without fear of reprisal from their employer or a third party. The 2014 Act was amended by the Protected Disclosures (Amendment) Act 2022 to give effect to the EU Directive 2019/1937 on the protection of persons who report breaches of Union law. Part 1 of this Policy reflects the current law.

(1) What is a “protected disclosure?”⁶

In broad terms, a protected disclosure is a disclosure of information about very serious matters or “relevant wrongdoings⁷” arising in a work related context. A person who has a serious concern about something to do with the Bank that they have noticed in connection with their work should consult the 2014 Act [here](#), including the definitions of “protected disclosure” and “relevant wrongdoing” in section 5, to assess whether they have information of the kind that may be the subject of a “protected disclosure”.

⁶ Per section 5(1) of the 2014 Act.

⁷ Per section 5(3) of the 2014 Act.

- Workers are encouraged to provide specific factual information in any disclosure to allow the Bank to conduct an appropriate assessment and investigation of the disclosure. The earlier a concern is raised, the easier it is for the Bank to make appropriate enquiry and take effective action.

A worker is not entitled to investigate any suspected relevant wrongdoing themselves and should not do so. Workers should disclose the information they have based on a reasonable belief that it discloses a relevant wrongdoing and it will be handled in line with the process set out in the process document entitled “**How to Make a Protected Disclosure**”. This is available to internal Bank staff [here](#), and can also be requested by emailing internalwhistleblowing@centralbank.ie or by contacting a member of IAD.

A person will not be penalised by the Bank for making a disclosure which they reasonably believe tends to show that a relevant wrongdoing has occurred or is occurring, even if they are wrong.

(2) What is a “relevant wrongdoing”?

For the purposes of the Act, the following are relevant wrongdoings:

- a) That an offence has been, is being or is likely to be committed;
- b) That a person has failed, is failing or is likely to fail to comply with any legal obligation, other than one arising under the worker's contract of employment or other contract whereby the worker undertakes to do or perform personally any work or services;
- c) That a miscarriage of justice has occurred, is occurring or is likely to occur;
- d) That the health and safety of any individual has been, is being or is likely to be endangered;
- e) That the environment has been, is being or is likely to be damaged;
- f) That an unlawful or otherwise improper use of funds or resources of a public body, or of other public money, has occurred, is occurring or is likely to occur;
- g) That an act or omission by or on behalf of a public body that is oppressive, discriminatory or grossly negligent or constitutes gross mismanagement;
- h) That a breach of specified EU law has occurred, is occurring or is likely to occur; or,
- i) That information tending to show any matter falling within (a)-(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.

Note: The reference to a “breach” in (h) above is a reference to an act or omission that is unlawful within the scope of Union law and covers matters such as public procurement, protection of the environment and protection of privacy and personal data, and security of network and information systems. Please see the full definition of “breach” per section 3(1) of The 2014 Act.

(3) Who can make a “protected disclosure”?

The 2014 Act applies to disclosures made by “workers” as defined in section 3 of the Act. “Worker” includes current and former employees, Central Bank Commission members, contractors and consultants, trainees, volunteers and job applicants. For the purposes of the Policy, the term “worker” is used to describe a person who can make a disclosure pursuant to the 2014 Act in accordance with this Policy. A person that makes a disclosure under the 2014 Act and in accordance with this Policy is referred to as a “reporting person”.

(4) Protections under the 2014 Act

Protection from dismissal, penalisation, civil and criminal liability.

The Bank will not dismiss or penalise anyone for making a protected disclosure. The Bank will not tolerate any penalisation of a worker who makes a protected disclosure and will take appropriate measures to protect a worker when they make a protected disclosure.

In the case of a disclosure by a worker who is not an employee of the Bank (for example, a contractor or consultant), the Bank will not penalise nor tolerate the penalisation of that person as a result of having made a protected disclosure. The Bank will make appropriate enquiry and take appropriate action if the reporting person makes a complaint of penalisation as a result of having made a protected disclosure.

Penalisation is defined⁸ as “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, and, in particular includes:

- a) Suspension, lay-off or dismissal;
- b) Demotion, loss of opportunity for promotion or withholding of promotion;
- c) Transfer of duties, change of location or place of work, reduction in wages or change in working hours;
- d) The imposition or administering of any discipline, reprimand or other penalty (including a financial penalty);
- e) Coercion, intimidation, harassment or ostracism;
- f) Discrimination, disadvantage or unfair treatment;
- g) Injury, damage or loss;

⁸ In section 3(1) of the 2014 Act.

- h) Threat of reprisal;
- i) Withholding of training;
- j) A negative performance assessment or employment reference;
- k) Failure to convert a temporary employment contract into a permanent one, where the worker had a legitimate expectation that he or she would be offered permanent employment;
- l) Failure to renew or early termination of a temporary employment contract;
- m) Harm, including to the worker's reputation, particularly in social media, or financial loss, including loss of business and loss of income;
- n) Blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry;
- o) Early termination or cancellation of a contract for goods or services;
- p) Cancellation of a licence or permit; and
- q) Psychiatric or medical referrals."

With the exception of defamation, civil legal action cannot be taken against a worker for making a protected disclosure. Workers can be sued for defamation but are entitled to a defence of "qualified privilege". In addition, Section 15 of the Act provides that if a worker is prosecuted for disclosing information that is prohibited or restricted (e.g. under section 33AK of the Central Bank Act 1942), it is a defence for the worker to show that they reasonably believed they were making a protected disclosure at the time the alleged offence occurred.

What to do if you feel you have been penalised for making a protected disclosure

If a reporting person considers that they have been penalised as a result of having made a protected disclosure, they should make a complaint to a Senior Audit Manager in IAD. IAD will determine how the matter should be appropriately handled.

Any evidence that an employee created difficulties for the reporting person due to the reporting person making a protected disclosure, sought to identify a reporting person, attempted to cover up wrongdoing, or otherwise penalised the reporting person, will be treated very seriously, will be enquired into appropriately and is likely to result in disciplinary action in accordance with the Bank's Disciplinary Procedure.

A worker that believes they have been penalised for making a protected disclosure also has an option of bringing a claim before the Workplace Relations Commission or a claim for injunctive relief in the Circuit Court. The worker should note the relevant time limits that apply for bringing a penalisation claim to the Workplace Relations Commission (within 6 months of the penalisation) and the Circuit Court (within 21 days of last instance of penalisation).

Confidentiality – Protection of identity of reporting person and the identity of “persons concerned”⁹

In accordance with the 2014 Act, as well as committing not to dismiss or penalise a worker for making a protected disclosure, the Bank will not disclose the identity of a reporting person, without the reporting person’s explicit consent unless it is deemed to be necessary and proportionate to do so in accordance with one of the legal grounds set out in section 16(2) of the 2014 Act.

The identity of a person concerned in the disclosure will not be disclosed for as long as any investigation triggered by the report is ongoing unless there is a legal basis for disclosing it. No person should attempt to identify a reporting person. If such attempts are made, whether successful or not, the Bank will treat the matter very seriously and it will be dealt with under the Bank’s Disciplinary Procedure.

All persons involved in an investigation will be required to maintain confidentiality in relation to the concerns being raised and the identities of any reporting person(s) or person(s) concerned.

(5) Motivation and reasonable belief

A worker’s motivation for making a protected disclosure is irrelevant. As long as a protected disclosure made to the Bank by a worker is based on the worker’s “reasonable belief” that the disclosure tends to show one or more relevant wrongdoings¹⁰, the applicable protections of the 2014 Act will apply to that worker.

Where a worker has made a report, they are required to conduct themselves professionally and to continue to carry out their duties as normal, whether or not that report has been assessed or investigated. The worker should not discuss the matter with others.

The term “reasonable belief” does not mean that the belief has to be correct. No worker will be penalised simply for getting it wrong so long as the worker reasonably believed when making the disclosure that the information disclosed to the Bank tended to show one or more relevant wrongdoings.

A report made in the absence of a reasonable belief will not have the protection of the 2014 Act. The Bank may pursue disciplinary action against a person who makes a disclosure to the Bank in the absence of a reasonable belief that the information tends to show one or more relevant wrongdoings. Furthermore, a reporting person who makes a report containing any information that he or she knows to be false, commits a criminal offence¹¹. Disclosure of a wrongdoing does not

⁹ A “person concerned” is defined in section 3 of the 2014 Act as “a natural or legal person who is referred to in a report as a person to whom the relevant wrongdoing is attributed or with whom that person is associated”. Section 16A (2) of the 2014 Act sets out the circumstances under which the identity of the person concerned may be disclosed.

¹⁰ “Relevant wrongdoing” shall be construed in accordance with section 5(3) and (5) of the 2014 Act.

¹¹ Per section 14A(2) of the 2014 Act.

necessarily confer any protection or immunity on a worker in relation to any involvement they may have had in that wrongdoing.

A matter is not a relevant wrongdoing if it is a matter which is the function of the worker, or the Bank, to detect, investigate or prosecute and does not consist of or involve an act or omission on the part of the employer¹².

(6) Anonymous Disclosures¹³

Workers are encouraged to identify themselves when raising a concern regarding a perceived relevant wrongdoing, but they may raise a concern anonymously. This Policy will apply whether or not the disclosure is made anonymously and any concern raised by a worker will be treated seriously, assessed on its merits and, if assessed as a protected disclosure, investigated in an appropriate manner.

On a practical level, however, it may be difficult for the Bank to effectively follow-up, assess and investigate a disclosure and to provide feedback if the identity of the reporting person is unknown. Accordingly, the Bank encourages workers to put their names to disclosures, with an assurance of protection of their identity, other than as provided for in the legislation¹⁴ (as discussed above in the section entitled “Confidentiality – Protection of identity of reporting person and the identity of “persons concerned”) and protection from dismissal and/ or penalisation.

A worker cannot obtain redress under the 2014 Act for any loss suffered in connection with an anonymous disclosure without identifying themselves. A worker who makes a disclosure by way of an anonymous report and who is subsequently identified and penalised for having made the disclosure is entitled to the protections under Part 3 of the 2014 Act.¹⁵

(7) Matters of a nature more appropriate to an external investigation

Some matters may be of such a nature that the investigation will more appropriately be carried out externally, or, by professional experts in a particular area. In some cases, the Bank may have statutory reporting obligations requiring it to refer the matter to an Garda Síochána or another body with the statutory power and function of investigation of particular matters. The Head of IAD will determine the appropriate course of action in these circumstances.

Section 19 of the Criminal Justice Act 2011 requires any person who has information that he or she knows or believes might be of material assistance in the prevention, apprehension, prosecution or conviction of specified offences to disclose that information to an Garda Síochána. If a worker has such information then that worker should, unless they have a reasonable excuse, disclose that information to an Garda Síochána as soon as it is practicable.

¹² Per section 5(5) of the 2014 Act.

¹³ Per section 5A(1) of the 2014 Act.

¹⁴ Per section 16(2) of the 2014 Act.

¹⁵ Per section 5A(2) of the 2014 Act.

(8) Feedback

The Bank will give feedback to a reporting person on the outcome of an assessment and the investigation of a disclosure, where appropriate, subject to factors¹⁶ including legal or investigatory limitations and the rights of any person(s) concerned¹⁷. As such, feedback may be limited to being advised that the assessment has been completed and that an investigation is taking or has taken place or that the Bank has determined that the matter does not require further investigation. Please note that it may not be possible to provide feedback where the reporting person has not given their contact details or identified themselves. Any feedback provided will be given to the reporting person on a confidential basis.

In situations involving a complaint regarding another employee(s) or worker(s), given the rights of that person(s) to privacy under the General Data Protection Regulation 2016/679/EU and the Data Protection Acts 1988-2018, the person(s)'s contract of employment or other agreement in the case of a worker, the Bank will be limited to providing feedback that confirms that appropriate action has been taken. There is no entitlement for the reporting person to know what that action was.

(9) Independent Advice service available

Independent, free and confidential advice may be sought by contacting Transparency International Ireland (TII). TII runs a free '[Speak Up' Helpline](#) where reporting persons can seek advice, information, and/or advocacy support to report wrongdoing. In addition, an Employee Assistance Programme (EAP) is available to Bank staff to provide in the moment support with a certified counsellor/psychotherapist. Details on the EAP are available on Plaza [here](#).

When speaking to TII or the EAP, workers should be careful to ensure that they do not disclose any information that should properly remain confidential. For more information on the type of information that is confidential, workers are referred to the Central Bank's Code of Ethics, including the sections relating to confidentiality under Section 33AK of the Central Bank Act, 1942. Workers should note that the unnecessary disclosure of confidential information externally may result in disciplinary or other action and could amount to a criminal offence¹⁸.

10) Protected Disclosures to persons other than within the Bank

The Bank is committed to ensuring that all protected disclosures made under the Internal Disclosures Policy are fully dealt with. Workers have the right under the 2014 Act to make a protected disclosure other than in the manner set out under Section 6 of the 2014 Act, for example to a prescribed person, a Minister and/or the Commissioner, provided one or more of the following conditions are met:

- the worker has previously made a report of substantially the same information to their employer or other responsible person; or to a prescribed person; or the Protected Disclosures

¹⁶ Those factors include rights to privacy under the General Data Protection Regulation 2016/679/EU and the Data Protection Acts 1988-2018.

¹⁷ "person(s) concerned" means a natural or legal person who is referred to in a report as a person to whom the relevant wrongdoing is attributed or with whom that person is associated.

¹⁸ Pursuant to section 33AK(8) of the Central Bank Act 1942.

Commissioner; or to a relevant Minister but no feedback has been provided to the worker in response to the report within the specified feedback period. Or, where feedback has been provided, the worker 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 concerned; and /or
- the worker reasonably believes that the relevant wrongdoing concerned 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.

Before making a disclosure otherwise than under this Policy to the Bank, workers should be aware that there are different and more stringent legal requirements to be met in order to qualify as a protected disclosure. They should carefully consider the additional tests they must meet in order to avail of the protections of the 2014 Act. Please see Sections 6-10 of the [Protected Disclosure Act 2014](#).

11) Review of certain decisions

A reporting person may request a review of certain decisions taken in the context of the handling of a protected disclosure. Any such request should set out the reasons. The review process is set out in the process document entitled “**How to Make a Protected Disclosure**”. This is available to internal Bank staff [here](#), and can also be requested by emailing internalwhistleblowing@centralbank.ie or contacting a member of IAD.

Part 2: Disclosure of Ethical Concerns

The Code of Ethics and its associated policies, (currently, the Policy on Staff Trading and Financial Assets; Policy on Receipt of Business Hospitality and Gifts and Policy on Managing Staff Conflicts of Interest), set out the standards of ethical conduct the Central Bank strives to maintain, as well as the principles that all staff members are expected to abide by and implement in the course of their day to day activities. In implementing and maintaining these policies, the Bank seeks to give effect to the requirements of the Guideline (EU) [2021/2253] of the European Central Bank (ECB) of 2 November 2021 laying down the principles of the Eurosystem Ethics Framework (ECB/2021/49) (recast) and the Guideline (EU 2021/2256) of the ECB of 2 November 2021 laying down the principles of the Ethics Framework for the Single Supervisory Mechanism (ECB/2021/50) (recast).

This part of the Policy gives workers¹⁹ a mechanism for raising concerns in relation to the “ethical requirements” that apply to members of staff or to a person with an employment relationship with the Bank. The Bank is committed to assessing complaints, investigating where it is warranted and to taking appropriate measures to ensure that potential cases of non-compliance are followed up, including as appropriate, by taking disciplinary action. There is no legal provision for reporting ethical concerns to anyone other than within the Bank.

While a complaint relating to a suspected breach of the ethics requirements may also amount to a “protected disclosure” for the purposes of the 2014 Act, the 2014 Act and its legal protections will only apply if the subject matter of the complaint comes within the definition of a “relevant wrongdoing²⁰”. Nonetheless, any such complaint about a suspected breach of the ethics requirements will be taken seriously, investigated where appropriate and the person(s) making such a complaint will not be penalised for making it.

Please ensure you are familiar with the requirements set out in the Code of Ethics and associated policies. If you have a concern that another person is potentially in breach of their ethics requirements, you will find the information you need to make a report and to ensure it is appropriately managed set out in the process document “**How to Make a Protected Disclosure**”. This is available to internal Bank staff [here](#), and can also be requested by emailing internalwhistleblowing@centralbank.ie or contacting a member of IAD.

(1) How to make an ethics disclosure

A worker who is concerned about a suspected breach of the ethics requirements of the Bank is not required or entitled to investigate any perceived breach of ethics and should not do so. They should set out their concerns and how they formed the reasonable belief that there may have been a breach of the ethics requirement in the **Form at Appendix 1** and give or send it to their line manager or point of contact (e.g. their Vendor Relationship Manager or Contract Manager).

If a worker does not feel comfortable raising a matter with their line manager or point of contact due to the nature of the concern, its seriousness, or for some other reason, they can raise it directly with a member of the team in IAD. A dedicated secure email address (internalwhistleblowing@centralbank.ie) hosted by IAD is available for this purpose. Access to this email is restricted to staff in IAD who are responsible for dealing with disclosures under this Policy. The **Form at Appendix 1** should be used for this purpose.

¹⁹ For the purposes of Part 2 of the Policy, the term “worker” is used to describe a person who can make a disclosure relating to a suspected breach of ethics and it includes employees, contractors, consultants and Commission Members.

²⁰ As defined in section 5(3)-(5) of the 2014 Act.

(2) Anonymous reports

Workers are encouraged to identify themselves when raising a concern regarding a suspected breach of the Bank's ethics requirements, but they may raise a concern anonymously. All concerns raised will be treated seriously, assessed on its merits and investigated in an appropriate manner.

On a practical level, however, it may be difficult for the Bank to effectively follow-up, assess and investigate and to provide feedback if the identity and/or contact details of the person that made the report is unknown. Accordingly, the Bank encourages workers to put their names to disclosures and it will deal with the disclosure in a manner that aims to protect the person's identity, unless it is considered reasonably necessary for the purposes of the investigation to disclose their identity. In any case, no worker will be penalised for having made a disclosure where it has been made in good faith and based on a reasonably held belief that a breach of the ethics requirements has occurred or is likely to occur.

(3) Confidentiality

Where a worker raising a concern about a suspected ethics breach asks the Bank not to disclose their identity, the Bank will not do so without first notifying the person, save in exceptional circumstances.

In practice, the decision to disclose the identity of the person who makes the complaint will generally be taken by the Senior Audit Manager in IAD. That decision, and the reason for the decision, will be communicated to the person by the Senior Audit Manager in writing before their identity is disclosed, save in exceptional circumstances.

The person may request a review of the decision to disclose their identity and should set out why they are opposed to their identity being revealed and that request will be passed to the Head of IAD for assessment and determination by the Head of IAD or other nominated person, as appropriate.

If a worker is concerned their identity is not being protected, please notify the Senior Audit Manager who has been appointed to the case who will assess and, where appropriate, investigate such concerns and will ensure appropriate action where necessary.

No person should attempt to identify who has made a complaint under Part 2 of this Policy. If such attempts are made, whether successful or not, the Bank will treat the matter very seriously and it may be dealt with under the Bank's Disciplinary Procedure.

The identity of any person about whom a complaint about a breach of ethics has been made will not be disclosed during the course of any investigation undertaken, save where the Bank reasonably considers that such disclosure is necessary for the purposes of an assessment of or investigation into the matter.

All persons involved in the investigation will be required to maintain confidentiality in relation to the concerns being raised and the identities of any person who has made a complaint or about whom the complaint has been made.

(4) Protection from penalisation

While there is no statutory protection for a person who makes a report under Part 2 of this Policy about a suspected ethics breach, if that breach is not also a “relevant wrongdoing” for the purpose of the 2014 Act, the Bank commits not to dismiss or otherwise penalise a person for making a report about an ethics breach when they do so in good faith and based on a reasonably held belief that a breach of ethics requirements has occurred.

(5) Feedback

The Bank will give feedback to a person that reports a suspected breach of ethics requirements in respect of the assessment of the report and the investigation of a report where appropriate, subject to factors including legal or investigatory limitations and the rights of any person(s) concerned. Please note that it may not be possible to provide feedback where the identity of the reporting person is not provided. Feedback will be provided to the reporting person at intervals set out in the process document entitled “**How to Make a Protected Disclosure**”. This is available to internal Bank staff [here](#), and can also be requested by emailing internalwhistleblowing@centralbank.ie or contacting a member of IAD. Any feedback provided will be given to the reporting person on a confidential basis.

In situations involving a complaint regarding another employee(s) or worker(s), given the rights of that person(s) to privacy under the General Data Protection Regulation 2016/679/EU and the Data Protection Acts 1988-2018, the person(s)’s contract of employment or other agreement in the case of a worker, the Bank will be limited to providing feedback that confirms that appropriate action has been taken. There is no entitlement for the reporting person to know what that action was.

4. Policy Review

The Bank’s Internal Disclosures Policy will be reviewed on at least an annual basis by IAD and approved by the Audit Committee as delegated by the Commission. Links in this Policy are verified and updated on at least an annual basis by IAD. However, if any of the links are not functioning as they should, please contact any member of the team in IAD.

5. Policy Implementation

This Policy will be updated annually and presented to the management of the Bank through inclusion at a monthly briefing which should be cascaded to all staff. In addition, a Plaza notice will also be published on an annual basis to remind all staff of the Policy.

The Policy is available to view, for current employees of the Bank, on the [Corporate Policies section](#) of the Governance Framework webpage on Plaza and on a dedicated IAD [Internal Disclosures Plaza webpage](#). It is also available to view on the [Staff Policies section](#) of the Bank’s external website.

6. Roles & Responsibilities

Workers	<p><u>Use the form at Appendix 1 to make the report</u></p> <p>Raise a concern with line manager or Bank point of contact (if not an employee) and use the form at Appendix 1 to make the report via the dedicated mailbox internalwhistleblowing@centralbank.ie. Workers may go directly to IAD with their concerns and use the form at Appendix 1 to make the report.</p>
Line Manager/Point of Contact	<p>If a protected disclosure or ethics disclosure is made verbally, complete the form at Appendix 1 and ask the reporting person to confirm its contents in writing before sending the form to IAD.</p> <p>If you receive a protected disclosure or ethics disclosure in writing from a worker, send it to IAD via the dedicated mailbox internalwhistleblowing@centralbank.ie.</p>
IAD	<p>Responsible for creation and implementation of the Policy and procedures, the assessment of information received and the handling of disclosures made pursuant to this Policy.</p>
HRD	<p>In general, will investigate where a reporting person makes a complaint of penalisation in connection with the making of a disclosure, which falls within the remit of this Policy. HRD may have another role if a disclosure under Part 1 or 2 relates to HRD.</p>
Audit Committee (as delegated by the Commission)	<p>Overall responsibility for the Policy and associated procedures, with implementation of the Policy delegated to IAD as above.</p>

7. Contacts

Any queries on the content of this Policy should be directed to the Head of IAD at internalwhistleblowing@centralbank.ie.

8. Documents considered in the drafting of this Policy

PART 1

- Protected Disclosures Act 2014 as amended by the Protected Disclosures (Amendment) Act 2022.
- Protected Disclosures Act Statutory guidance for public bodies and prescribed persons – by the Department of Public Expenditure, NDP Delivery and Reform (DPER) (November 2023).
- Central Bank of Ireland Dignity at Work Policy.
- Central Bank of Ireland Grievance Procedure.

PART 2

- Guideline (EU) [2021/2253] of the European Central Bank of 2 November 2021 laying down the principles of the Eurosystem Ethics Framework (ECB/2021/49) (recast).
- Guideline (EU 2021/2256) of the ECB of 2 November 2021 laying down the principles of the Ethics Framework for the Single Supervisory Mechanism (ECB/2021/50)(recast).
- Central Bank of Ireland Dignity at Work Policy.
- Central Bank of Ireland Grievance Procedure.
- Central Bank of Ireland Policy on Staff Trading and Financial Assets.
- Central Bank of Ireland Policy on Receipt of Business Hospitality and Gifts.
- Central Bank of Ireland Policy on Managing Staff Conflicts of Interest.

9. Version Control

Title of Document	Internal Disclosures Policy	
Version No.	2	
Document Owner	Audit Committee	
Division Responsible for Document Maintenance	Internal Audit Division	
Date of Next Review	Q4 2025	
	Name	Date
Prepared by	Internal Audit Division	July 2024
Reviewed by	Legal Division	August 2024

Approval Framework

Description	Relevant Approver	Date
Approval	Audit Committee	

Appendix 1

Strictly Confidential

Internal Disclosure Reporting Form for workers in the Central Bank of Ireland

Depending on the nature of the concern, completed forms should be emailed to internalwhistleblowing@centralbank.ie. Alternatively, IAD will accept the form in Appendix 1 being sent by post or hand delivered to IAD.

I wish to disclose (Tick all that apply):

A Protected Disclosure (<i>complete section A and section B</i>)	
An Ethical Concern (<i>complete section B</i>)	

PART 1: PROTECTED DISCLOSURES

For the reporting of any instance where a worker/former worker²¹ of the Bank suspects that a “relevant wrongdoing” as defined in section 5 of the 2014 Act has occurred, is occurring or is likely to occur in the Bank please complete sections A and B below.

SECTION A.

Which of the following best describes the alleged situation? (Tick all that apply)

The following “relevant wrongdoing(s)” has occurred, is occurring or is likely to occur in the Bank:	
a. that an offence has been, is being or is likely to be committed.	
b. that a person has failed, is failing or is likely to fail to comply with any legal obligation, other than one arising under the worker’s contract of employment or other contract whereby the worker undertakes to do or perform personally any work or services.	
c. that a miscarriage of justice has occurred, is occurring or is likely to occur.	
d. that the health or safety of any individual has been, is being or is likely to be endangered.	
e. that the environment has been, is being or is likely to be damaged.	
f. that an unlawful or otherwise improper use of funds or resources of a public body, or of other public money, has occurred, is occurring or is likely to occur.	

²¹ For the purposes of the Policy, the term “worker” is used to describe a person who can make a disclosure pursuant to the 2014 Act. “Worker” includes employees and former employees of the Bank and also includes individuals who currently work or have worked within the Bank under a contract, whether express or implied, such as external consultants, contractors, agency personnel, volunteers and Central Bank Commission members.

g. that an act or omission by or on behalf of a public body is oppressive, discriminatory or grossly negligent or constitutes gross mismanagement.	
h. that a breach ²² has occurred, is occurring or is likely to occur.	
i. In that information tending to show any matter falling within any of the preceding paragraphs has been, is being or is likely to be concealed or destroyed or an attempt has been, is being or is likely to be made to conceal or destroy such information.	

PART 2: ETHICAL CONCERNS

For the reporting of any concerns in relation to the “ethical requirements” that apply to “members of staff”, or a person with an employment relationship with the Central Bank of Ireland please complete section B below only.

SECTION B.

Does the reporting person consent to the Central Bank disclosing his/her identity for the purpose of assessing and investigating this disclosure?

Yes	
No	²³

If yes, please state the reporting person’s name(s) and details:

Name of Reporting Person	
Division	
Phone No	
Email	

What is the relationship of the reporting person to the Bank? (Tick all that apply.)

Employee of the Bank	
Vendor/Service Provider	
Contractor	
Other (please specify)	

Has this activity been reported to any other person or division?

²² See section 3(1) of the Act for the definition of a “breach”.

²³ Where a worker making a disclosure has asked the Bank not to disclose their identity, the Bank will not do so other than in accordance with the 2014 Act. The Bank cannot commit to never revealing the identity of a worker who has made a disclosure.

Yes	
No	

If yes, to whom, when and what action was taken? Additional pages can be added if needed:

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Provide a details of the alleged relevant wrongdoing or breach of ethics requirements. Additional pages can be added if needed:

Date of the alleged wrongdoing (if known) or the date the alleged wrongdoing commenced/ was identified:	
Is the alleged wrongdoing still ongoing?	
Name of the (persons) allegedly involved in the alleged wrongdoing: (if any name is known and naming individual(s) is necessary to report the wrongdoing)	
Other relevant information:	

Confirmation from Person Receiving the Disclosure (where a worker raises a Protected Disclosure in accordance with the Policy to a line manager/ someone other than in IAD):

*The above concern has been notified to me. I have confirmed with the worker that the above details are accurately recorded (**please attach copy of written confirmation from the person making the disclosure**).*

Recipient Name	
Division	
Phone No	
Email	
Date	



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem