



WEST LIMERICK INDEPENDENT LIVING CLG

WLILP22

PROTECTED DISCLOSURES (WHISTLEBLOWING) POLICY

Speak up safely. Concerns will be handled fairly, confidentially and without penalisation.

Policy owner	Board of Directors
Designated Persons	Two Service Coordinators, appointed by the Board (see Section 15 for role description; current names and contact details are on WLIL's staff noticeboard and available from the General Manager)
Alternative route	Chairperson of the Board where either Designated Person is involved or a conflict arises
Issue	Issue 1 - September 2026
Approval / review	Effective on Board approval; review annually or sooner if legislation/guidance changes

CONFIDENTIAL REPORTING ROUTES

Report to the Designated Persons, two Service Coordinators appointed by the Board. Current names and contact details are displayed on WLIL's staff noticeboard and available from the General Manager, rather than fixed in this policy, so they stay accurate as the role-holders change. If the concern involves either Designated Person, use the Chairperson of the Board route instead. You may report in writing, orally, by telephone, or request a private meeting.

Quick guide - is this the right policy?

This policy is for workers who become aware, through their work, of information that they reasonably believe tends to show a relevant wrongdoing. It is designed to make speaking up straightforward and safe.

PROTECTED DISCLOSURE	EMPLOYMENT GRIEVANCE	SERVICE USER COMPLAINT / SAFEGUARDING
Possible wrongdoing learned about in a work-related context - for example serious safety concealment, a criminal offence, legal non-compliance, misuse of public money, or concealment of evidence.	A personal employment matter affecting you exclusively - for example your own roster, leave, pay, or interpersonal conflict. Usually use the Grievance / Dignity at Work process.	A concern about a service, safeguarding, abuse, neglect, care or immediate safety. Use the relevant service/safeguarding/incident route immediately. The matter may also qualify as a protected disclosure.

At a glance

Do I have to prove wrongdoing?	No. You need a reasonable belief based on information that came to your attention through work.
Who can I report to?	Either Designated Person — the Designated Persons, two Service Coordinators appointed by the Board. Current names and contact details are displayed on WLIL's staff noticeboard and available from the General Manager, rather than fixed in this policy, so they stay accurate as the role-holders change.
What if either Designated Person is involved?	Use the Chairperson of the Board route instead.
Can I speak rather than write?	Yes. Reports may be written or oral. You may also request a private meeting.
Can I report anonymously?	Yes. WLIL will follow up anonymous reports as far as reasonably possible.
When will I hear back?	Written acknowledgement within 7 days (where contact details are available), and feedback within 3 months.
Will my identity be protected?	Yes, subject to the limited exceptions provided by law.
Can I be penalised?	No. Penalisation, threats of penalisation or attempts to hinder a report are prohibited.

URGENT SAFETY OR SAFEGUARDING

This policy must never delay urgent action needed to protect a service user, worker or other person. Where there is immediate danger, a safeguarding concern or another urgent risk, use the appropriate emergency, safeguarding or incident procedure straight away. A protected disclosure may be handled in parallel where appropriate.

1. Purpose and commitment

West Limerick Independent Living CLG (WLIL) is committed to openness, integrity, accountability and a culture in which workers can safely speak up about suspected wrongdoing. Reports will be taken seriously, handled fairly and followed up by an impartial and competent person.

This policy is intended to comply with the Protected Disclosures Act 2014, as amended by the Protected Disclosures (Amendment) Act 2022, and to reflect current Irish statutory requirements for internal reporting channels. It should be read with WLIL policies on safeguarding, incident management, complaints, grievances, dignity at work, data protection, confidentiality and health and safety.

2. Who can use this policy?

The legislation uses the term "worker" broadly. This policy applies, as relevant, to people who acquired information about possible wrongdoing in a work-related context, including:

- current and former employees, including Personal Assistants and Home Support workers;
- agency workers and persons supplied by third parties;
- contractors, subcontractors and people providing services under contract;
- trainees, work-experience participants and volunteers;
- Board members and former Board members;
- job applicants and persons who acquired information during recruitment or pre-contractual discussions; and
- other persons who fall within the statutory definition of worker.

3. What is a protected disclosure?

A protected disclosure is a report of information which, in the reasonable belief of the worker, tends to show one or more relevant wrongdoings and which came to the worker's attention in a work-related context.

KEY POINT

You do not have to investigate the matter or prove that wrongdoing occurred. Report the information you have. Your motivation for reporting does not determine whether the report is protected.

Relevant wrongdoing can include

- a criminal offence;
- failure to comply with a legal obligation (other than a legal obligation arising only from the worker's own employment or services contract);
- a miscarriage of justice;
- endangerment of the health or safety of any person;
- damage to the environment;
- unlawful or improper use of public funds or other public money;
- specified breaches of European Union law covered by the legislation; and
- concealment or destruction of information tending to show any of the above.

A wrongdoing may have happened in the past, may be happening now, or may be likely to happen in the future.

4. What is not normally a protected disclosure?

A personal complaint or interpersonal grievance that affects the reporting person exclusively is not normally a relevant wrongdoing under the Protected Disclosures Act. Examples include a disagreement about your own roster, annual leave, pay, performance management or a personal workplace conflict.

Such matters will normally be dealt with under WLIL's Grievance, Dignity at Work or other relevant employment procedures. However, the label used by the worker does not decide the issue. If a grievance or complaint also contains information tending to show relevant wrongdoing, the protected disclosure elements will be identified and handled under this policy.

5. Practical examples

Example 1 - Serious safety concern

A worker becomes aware that a serious risk to a service user has repeatedly been concealed and required safety action has deliberately not been taken. **Likely a protected disclosure**

Example 2 - Public money

A worker obtains information suggesting that public funding received for service delivery is knowingly being used for an unlawful or improper purpose. **Likely a protected disclosure**

Example 3 - Personal grievance

A worker disagrees with their individual roster or leave decision and there is no wider alleged wrongdoing. **Normally use the grievance procedure**

Example 4 - Concern proves mistaken

A worker reports information that they reasonably believed showed wrongdoing, but a fair investigation later finds that no wrongdoing occurred. **The worker can still be protected**

6. How to make an internal report

WLIL encourages workers to use the internal route where they feel able to do so. A report may be made to either Designated Person below. You do not have to report through your line manager first.

ROUTE	CONTACT	HOW TO USE IT
Designated Persons	The Designated Persons — the Designated Persons, two Service Coordinators appointed by the Board. Current names and contact details are displayed on WLIL's staff noticeboard and available from the General Manager, rather than fixed in this policy, so they stay accurate as the role-holders change	Email either Designated Person directly; call and ask to speak privately with a Designated Person; or request a confidential in-person meeting. If calling, you do not need to give details to another staff member.
Alternative route	Chairperson of the Board of Directors West Limerick Independent Living CLG Sheehan's Road, Gortboy Newcastle West, Co. Limerick V42 EE38	Use this route where the concern involves either Designated Person, or a conflict of interest makes the normal route inappropriate. Mark a sealed envelope: PRIVATE & CONFIDENTIAL - PROTECTED DISCLOSURE - CHAIRPERSON ONLY. It must be forwarded unopened.

Ways to report

- in writing by email or sealed letter;
- orally by telephone;
- through another agreed voice communication method; or
- by requesting a physical meeting with a Designated Person, which WLIL will arrange within a reasonable period.

IF THE REPORT GOES TO THE WRONG PERSON

Any WLIL worker who receives information that may be a protected disclosure must not investigate it, discuss it widely or alter it. The information should be passed promptly and confidentially, without modification, to a Designated Person. Information that could identify the reporting person must not be disclosed unnecessarily.

What information is useful?

There is no mandatory WLIL form. Where possible, include enough information to allow a person with no prior knowledge of the matter to understand the concern. Useful information includes:

- that you are making a protected disclosure under this policy;
- your confidential contact details (unless reporting anonymously);
- what happened or may happen, and how you became aware of it;
- the date or period involved and whether the matter is ongoing;
- the names of people involved, only where relevant and necessary;
- whether you have raised the matter previously and what happened; and
- any records or information already in your possession.

DO NOT INVESTIGATE IT YOURSELF

Do not put yourself or anyone else at risk, access records you are not entitled to access, breach confidentiality unnecessarily, or attempt to gather evidence unlawfully. Report what you know.

7. Anonymous reports

WLIL accepts anonymous protected disclosure reports and will follow them up to the greatest extent reasonably possible. A person who makes an anonymous report and is later identified and penalised may still be entitled to the protections of the legislation.

Anonymous reporting can make it harder to ask questions, assess evidence, provide feedback or protect the reporting person from penalisation. Where possible, a worker may choose to provide a secure contact method without revealing more personal information than necessary.

8. What happens after WLIL receives a report?

STAGE	WHAT WLIL WILL DO	TIMING / NOTE
1. Secure receipt	The report is restricted to a Designated Person and any other person genuinely necessary for receipt, follow-up or investigation.	Confidential from receipt
2. Acknowledge	WLIL acknowledges receipt in writing where contact details are available.	Within 7 days
3. Initial assessment	The Designated Person assesses whether there is prima facie evidence that relevant wrongdoing may have occurred and may ask for more information.	As soon as practicable
4. Route / decision	If no prima facie evidence exists, the procedure may be closed or the matter may be referred to an appropriate grievance or other procedure. The reporting person is told the decision and reasons in writing.	Prompt written notification
5. Follow-up	Where relevant wrongdoing may have occurred, WLIL takes appropriate follow-up action. This may include fact-finding, investigation, referral to another competent person or urgent protective action.	Proportionate to seriousness
6. Feedback	WLIL provides feedback about action taken or envisaged, subject to confidentiality and legal limits.	No later than 3 months
7. Further feedback	If requested in writing, further feedback is provided while the procedure remains open.	At 3-month intervals

Feedback does not necessarily mean that the reporting person will receive confidential information about another worker, disciplinary outcomes, safeguarding information, legal advice or other information that WLIL is not entitled to disclose.

9. Assessment, follow-up and investigation

The Designated Person is responsible for the initial assessment and for ensuring diligent follow-up. The Designated Person does not have to conduct every investigation personally. Depending on the subject matter, WLIL may appoint an appropriately independent internal or external person with suitable competence.

The nature of follow-up will depend on the seriousness and circumstances of the report. It may involve document review, interviews, specialist advice, safeguarding or health and safety action, referral to a regulator or other competent body, disciplinary processes, financial controls, or other proportionate measures.

FAIRNESS TO EVERYONE

A report is information to be assessed - it is not proof that wrongdoing occurred. Any person named in a report will be treated fairly and their confidentiality and legal rights will be respected. No finding will be made simply because an allegation has been reported.

10. Confidentiality and protection of identity

WLIL will protect the identity of the reporting person and information from which their identity could be directly or indirectly deduced. Without the reporting person's explicit consent, identifying information will only be shared with persons whom WLIL reasonably considers necessary for the receipt, transmission or follow-up of the report, or where disclosure is otherwise permitted or required by law.

Where the law requires or permits identity to be disclosed in defined circumstances, WLIL will follow the statutory notification requirements unless giving advance notice would jeopardise an investigation, the prevention of serious risk, or the prevention/prosecution of crime.

No person should attempt to identify an anonymous reporting person or seek information about a reporting person outside what is necessary for their role. Any such conduct may be treated seriously under WLIL procedures.

11. Protection from penalisation

WLIL prohibits penalisation, threatened penalisation, retaliation and attempts to hinder a worker from making a protected disclosure. Protection also extends in certain circumstances to facilitators and persons or entities connected with a reporting person.

Penalisation can include dismissal, suspension, demotion, reduced pay or hours, unfair transfer of duties, disciplinary action, coercion, intimidation, harassment, ostracism, discrimination, withholding training, negative performance assessment or employment reference, damage to reputation, financial loss, blacklisting or other unjustified detriment linked to reporting.

IF YOU BELIEVE YOU ARE BEING PENALISED

Tell a Designated Person immediately. If the concern relates to either Designated Person, notify the Chairperson of the Board. The Protected Disclosures legislation also provides external remedies and time limits, so a worker may wish to obtain independent advice promptly.

12. Knowingly false information

A worker does not lose protection simply because a concern reported on reasonable grounds later proves to be mistaken. WLIL will not treat an unsubstantiated report as misconduct merely because the wrongdoing could not be established.

This is different from knowingly reporting false information. Knowingly making a false report can have serious legal consequences under the Protected Disclosures legislation, including potential civil liability and criminal consequences. Deliberately false reporting may also be addressed under WLIL procedures, subject to fair process.

13. Data protection and record keeping

WLIL will keep a secure record of every protected disclosure report, including anonymous reports, in line with the Protected Disclosures legislation and applicable data protection law. Access will be limited to persons who genuinely require it for the statutory process.

- Protected disclosure records will be stored separately from ordinary personnel, grievance and complaints records where practicable.
- Records will be retained no longer than is necessary and proportionate to comply with the Protected Disclosures Act and any other applicable legal obligation.
- If an oral report is made on an unrecorded telephone line or in a meeting, the Designated Person may prepare accurate written minutes.
- Where the reporting person is identifiable, they will be given an opportunity, where appropriate, to check, correct and agree the record of an oral report.

- A recorded telephone/voice system will only be used with the reporting person's consent where recording is proposed.

14. External reporting and independent advice

A worker may make a report outside WLIL where the conditions in the Protected Disclosures Act are met. External routes include an appropriate prescribed person (usually a regulator with responsibility for the subject matter) and the Office of the Protected Disclosures Commissioner. Different statutory conditions apply to some external routes.

For a report to a prescribed person or the Protected Disclosures Commissioner, the worker must reasonably believe that the information disclosed and any allegation contained in it are substantially true; in the case of a prescribed person, the worker must also reasonably believe the wrongdoing falls within that person's prescribed remit.

A worker may also obtain confidential legal advice about the operation of the legislation from a barrister, solicitor, trade union official or other person covered by the statutory legal-advice route. WLIL does not require a worker to obtain legal advice before reporting internally.

CURRENT EXTERNAL INFORMATION

The official list of prescribed persons and current information on the Office of the Protected Disclosures Commissioner are available through Gov.ie and www.opdc.ie. Because prescribed persons and contact details can change, workers should check the current official information when considering an external report.

15. Roles and responsibilities

ROLE	RESPONSIBILITY
Board of Directors	Approves this policy, oversees the effectiveness of the reporting arrangements and receives appropriately anonymised governance information without compromising confidentiality.
Designated Persons	Receive reports, protect confidentiality, acknowledge reports, perform initial assessment, maintain communication, ensure diligent follow-up and provide feedback.
Chairperson of the Board	Acts as the alternative confidential route where the concern involves either Designated Person or where a conflict makes the normal route inappropriate. Ensures an impartial and competent person handles the matter.
Managers and all workers	Know how to recognise a possible protected disclosure, preserve confidentiality and pass any misdirected report promptly to the appropriate route without investigating it themselves.

16. Training, awareness and review

WLIL will ensure that the Designated Persons receive appropriate training in the receipt, assessment, follow-up and confidentiality requirements for protected disclosures. Managers and relevant staff will receive awareness guidance so that reports are recognised and routed correctly.

This policy will be made easily accessible to workers and will be included in relevant induction and staff information arrangements. It will be reviewed at least annually and sooner where there is a change in legislation, official guidance, WLIL structures or learning from the operation of the procedure.

Appendix A - Optional protected disclosure report guide

You do not have to use this format. It is provided to make reporting easier. Give only information you reasonably believe is relevant. Do not investigate the matter yourself.

1. Reporting person	Name and confidential contact details (leave blank if reporting anonymously):
2. Date of report	
3. What happened / may happen?	Describe the information that you reasonably believe tends to show wrongdoing.
4. When and where?	Dates, period, location or service area, if known.
5. Is it ongoing?	Yes / No / Unsure - add brief detail.
6. People involved	Names only where relevant and necessary.
7. Previous reporting	Have you raised this before? If yes, to whom and when?
8. Supporting information	List any documents or information already in your possession. Do not obtain material unlawfully.
9. Preferred contact	Email / phone / meeting / other secure method.

HOW TO SEND IT

Send it directly to the Designated Persons, two Service Coordinators appointed by the Board. Current names and contact details are displayed on WLIL's staff noticeboard and available from the General Manager, rather than fixed in this policy, so they stay accurate as the role-holders change, hand it to either Designated Person, or place it in a sealed envelope clearly marked PRIVATE & CONFIDENTIAL - PROTECTED DISCLOSURE. If either Designated Person is involved in the concern, use the Chairperson route.

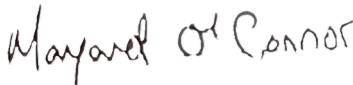
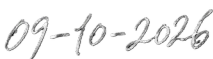
Appendix B - One-page staff flowchart

1	You become aware of possible wrongdoing through your work.
2	Ask: Do I reasonably believe the information tends to show relevant wrongdoing?
3	Report to either Designated Person — the Designated Persons, two Service Coordinators appointed by the Board. Current names and contact details are displayed on WLIL's staff noticeboard and available from the General Manager, rather than fixed in this policy, so they stay accurate as the role-holders change. If either is involved, report to the Chairperson of the Board.
4	WLIL secures the report and acknowledges it in writing within 7 days (where contact details are available).
5	A Designated Person carries out an initial assessment and may ask for further information.
6	If relevant wrongdoing may have occurred, appropriate follow-up / investigation is arranged.
7	Feedback is provided within 3 months and, if requested in writing, every 3 months while the procedure remains open.
8	Actions and learning are recorded securely. Confidentiality and protection from penalisation continue throughout.

REMEMBER

You do not have to prove wrongdoing. Do not investigate it yourself. Report what you know. WLIL will assess and follow up the concern.

Approval

Approved by	Board of Directors, West Limerick Independent Living CLG — 9 October 2026
Signed on behalf of the Board, on its instruction, by	Margaret O'Brien O'Connor, General Manager 
Date signed	
Next review	12 months after approval, or earlier if required