



Whistleblowers Protection Procedure

The procedure for Whistleblowers Protection consists of 10 components.

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1. Making a disclosure

Disclosures may be made orally, in writing or anonymously.

Where a disclosure is made anonymously, the Institute will not be required to notify the whistleblower in accordance with these procedures.

All correspondence, phone calls and emails from internal and external whistleblowers will ultimately be referred to the **Protected Disclosure Coordinator**.

A person who is contemplating making a disclosure and is concerned about approaching the protected disclosure co-ordinator or a protected disclosure officer in the workplace may request that the meeting be held in a discreet location away from the workplace.

A person who is contemplating making a disclosure must be convinced of the truth of their concerns, have reasonable grounds for believing that the alleged conduct has occurred, and will be required to substantiate any allegations.

It is an offence for a person to knowingly provide false information under the Act with the intention that it is acted on as a disclosed matter.

Internal to the Institute

The Institute has nominated the following officer to receive and facilitate disclosures of improper conduct or detrimental action by the Institute or its officers, employees or contractors:

Protected Disclosure Coordinator

Contact Details:

Darrell Cain
Chief Operating Officer / Deputy CEO
Building 3, Elgar Campus, 465 Elgar Road, Box Hill,
Email: d.cain@bhtafe.edu.au
Direct Telephone Number: (03) 9286 9262
Mobile Number 0401 999 798

Protected Disclosure Officers will be appointed from time to time by the Protected Disclosure Coordinator to facilitate the receiving of disclosures. The names and contact details of Protected Disclosure Officers will be made available via the Institute's website.

External to the Institute

The Ombudsman

A disclosure under this procedure may also be made directly to the Victorian Ombudsman on the online form provided on the website: www.ombudsman.vic.gov.au

The following table sets out where disclosures about persons other than officers, employees or contractors of the Institute should be made.

Person who is the subject of the disclosure	Person/body to whom the disclosure must be made
Employee of the Institute	The Institute or the Ombudsman
Member of Parliament (Legislative Assembly)	Speaker of the Legislative Assembly
Member of Parliament (Legislative Council)	Speaker of the Legislative Council
Board Member	The Ombudsman
Chief Commissioner of Police	The Ombudsman or Deputy Ombudsman
Member of the Police Force	The Ombudsman, Deputy Ombudsman or Chief of Police

2. Roles and Responsibilities

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Officers, employees, contractors and members of the public

- Are encouraged to report known or suspected incidences of improper conduct or detrimental action in accordance with these procedures and cooperate with the implementation of this policy and procedure.
- Refrain from any activity that is or could be perceived to be victimisation or harassment of a person who makes a disclosure,

- Protect and maintain the confidentiality of a person they know or suspect to have made a disclosure.

Protected Disclosure Officers

- Provides general advice about the operation of the Act for any person wishing to make a disclosure about improper conduct or detrimental action,
- Makes arrangements for a disclosure to be made privately and discreetly and if necessary away from the workplace,
- Receives any disclosure made orally or in writing,
- Commits to writing any disclosure made orally, including details of the supporting facts for the reasonable grounds of the disclosure
- Takes all necessary steps to ensure that the identity of the whistleblower and the identity of the person who is the subject of the disclosure are kept confidential.
- Forward all disclosures and supporting evidence including printouts of e-mails in a sealed envelope marked “Private and Confidential” and deliver by hand to the Protected Disclosure Coordinator and
- Ensure that any e-mails forwarded to them in their capacity as Protected Disclosure Officers are deleted, including any back up copies, once sent in hard copy to the Protected Disclosure Coordinator.

The Protected Disclosure Coordinator

- Receives all disclosures forwarded from the Protected Disclosure Officer
- Receives all phone calls, emails and letters received directly from people seeking to make a disclosure,
- Impartially assesses each disclosure to determine whether it is a protected disclosure and whether it is a public interest disclosure,
- Refers all public interest disclosures to the Ombudsman,
- Appoints an investigator to carry out an investigation referred by the Ombudsman,
- Oversees and co-ordinates an investigation if an investigator is appointed,
- Appoints a welfare manager to support the whistleblower and to protect him/her from any reprisals,
- Makes appropriate arrangements for support for any employee who is the subject of a disclosure
- Advises the whistleblower of the progress of an investigation into the disclosed matter,
- Establishes and manages a confidential filing system,
- Collates and publishes statistics on disclosures made,

- Takes all necessary steps to ensure that the identities of the whistleblower and the person who is the subject of the disclosure are kept confidential and
- Liaises with the Chief Executive Officer and the Ombudsman as appropriate.
- Will have unfettered access to the CEO, and independent legal, financial and operational advisers as required.

The **Investigator**

- May be a person from within the Institute or a contractor engaged for that purpose.
- Carries out an internal investigation into a disclosure referred to the Institute in accordance with these procedures.

The **Welfare Manager**

- Provides support and advice to the Whistleblower in accordance with these procedures.
- Examines the immediate welfare and protection needs of the whistleblower and seeks to foster a supportive work environment,
- Advises the whistleblower of the legislative and administrative protections available to them,
- Listens and responds to any concerns of harassment, intimidation or victimisation in reprisal for making disclosure
- Keeps a contemporaneous record of all aspects of the case management of the whistleblower including all contact and follow up action and
- Ensures that the expectations of the whistleblower are realistic.

Where appropriate the Institute will appoint an external investigator and/or an external welfare manager to undertake the respective roles required under these procedures giving due consideration to ensuring that externally appointed investigators and welfare managers have the necessary skills, qualifications and experience to undertake these roles.

3. Confidentiality

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The Institute will take all reasonable steps to ensure that the identity of the whistleblower and the identity of the person who is the subject of the disclosure are kept confidential.

The Institute is also required to protect whistleblowers from reprisals for making a protected disclosure.

Whistleblowers are advised that it is in their own interests to keep disclosures confidential.

It must be recognised that in some circumstances it may be impossible to protect the identity of the whistleblower. For example, a case may arise where it is well known within the Institute that only the whistleblower could have access to information in the disclosure. In certain circumstances the law may require disclosure of identity of the whistleblower in legal proceedings. In these circumstances, the whistleblower must be made aware that to

investigate a matter, his or her identity will probably be revealed. Whilst confidentiality may not be maintained, the whistleblower is still afforded the various protections of the Act and will have a welfare manager appointed to his/her case.

Where confidentiality cannot be maintained, the whistleblower has the right to request additional positive action by the Institute to protect them.

Any person who receives information due to the handling or investigation of a protected disclosure must not disclose that information. Disclosure of information in breach of the Act constitutes an offence that is punishable by a maximum fine of 60 penalty points or six months imprisonment or both.

The **Protected Disclosure Coordinator** has the authority to disclose information about a protected disclosure in the following limited circumstances.

- Where exercising the functions of the Institute under the Act,
- When making a report or recommendation under the Act,
- When publishing statistics in the Institute's annual report and
- In criminal proceedings for certain offences under the Act.

The Act prohibits the inclusion of particulars in any report or recommendation that is likely to lead to the identification of the whistleblower. The Act also prohibits the identification of the person who is subject of the disclosure in any particulars included in an annual report.

As a further assurance of confidentiality, a person cannot obtain information about a protected disclosure under the *Freedom of Information Act 1982*.

The **Protected Disclosure Coordinator**

- Ensures all files, paper or electronic and including all materials relevant to an investigation such as tapes, are kept in a secure room and can only be accessed by the protected disclosure co-ordinator, protected disclosure officers, the investigator or the welfare manager (in relation to welfare matters),
- Ensures that all printed materials are kept in files that are clearly marked as a Whistleblower Protection matter and warn of criminal penalties that apply to any unauthorised divulging of information concerning a protected disclosure, and
- Ensures that all electronic files are stored securely and password protected.

The Institute and relevant officers:

- will not email or fax documents relevant to a whistleblower matter,
- will ensure confidentiality via personal delivery of documents,
- will ensure that all phone calls and meetings are conducted in private.

4. Collating and Publishing Statistics

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The **Protected Disclosure Coordinator** establishes a secure register to record the information required to be published in the annual report and to generally keep account of

the status of whistleblowers disclosures. The register will be confidential and will not record any information that may identify the whistleblower.

The register will contain the following information:

- The number and types of disclosures made to the Institute during the calendar year,
- The number of disclosures referred to the Ombudsman for determination as to whether a public interest disclosure
- The number and types of disclosed matters referred to the Institute by the Ombudsman for investigation
- The number and types of disclosures referred by the Institute to the Ombudsman for investigation
- The number and types of investigations taken over from the Institute by the Ombudsman
- The number of requests made by a whistleblower to the Ombudsman to take over an investigation by the Institute
- The number and types of disclosed matters that the Institute had declined to investigate
- The number and types of disclosed matters that were substantiated upon investigation and action taken on completion of the investigation and
- Any recommendations made by the Ombudsman that relate to the public body.

5. Receiving and Assessing a Disclosure

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Receiving Disclosures

A complaint or report or allegation of improper conduct or detrimental action may be received where the person making the allegation does not refer to the Whistleblowers Protection Act. Staff receiving allegations should advise the person that he/she may wish to make a disclosure under the Act due to the protections it provides to genuine whistleblowers. Guidance on how to make the disclosure in accordance with the Act should be provided.

Assessment of Disclosures

Where a disclosure has been received the **Protected Disclosure Coordinator**

- Assesses whether the disclosure has been made in accordance with the Act and meets the criteria for a **protected disclosure**
- Determines whether the disclosure relates to an employee, contractor, member or officer of the Institute. If it doesn't relate to an employee, contractor, member or officer of the Institute, advises the whistleblower of the correct person or body to whom the disclosure should be directed and where such a disclosure is made anonymously, refers the disclosure to the Ombudsman.

In assessing whether a disclosure is a **protected disclosure** for the purposes of the Act, the **Protected Disclosure Coordinator** must consider the following criteria:

- A) For a disclosure to be a **protected disclosure** it must
- Be made by a natural person (i.e. An individual and not a corporation) **and**
 - Relate to the conduct of the public body or public officer, employee or contractor of the Institute acting in their official capacity **and**
 - The alleged conduct is either **improper conduct** or **detrimental action** against a person in reprisal for making a protected disclosure under the Act **and**
 - The person making the disclosure must have reasonable grounds for believing that the alleged conduct has occurred.

- B) For conduct to be considered **improper conduct** and therefore within the provisions of the Act it must meet **one** of the following definitions

It must be conduct that is corrupt, i.e.

- Conduct of any public body or person (whether or not a public official) that adversely affects the honest performance of a public officer's or body's functions,
- Relate to the performance of a public officer's functions dishonestly or with inappropriate partiality,
- Conduct of a public officer, former public officer or a public body that amounts to a breach of public trust,
- Conduct of a public officer, former public officer or a public body that amounts to the misuse of information or material acquired in the course of the performance of their official functions or
- A conspiracy or attempt to engage in the above conduct, **or**
- It must be conduct involving a substantial mismanagement of Institute resources **or**
- It must be conduct involving substantial risk to public health or safety, **or**
- It must be conduct involving substantial risk to the environment **and**
- that would, if proved, constitute a criminal offence or reasonable grounds for dismissing or dispensing with, or otherwise terminating, the services of the public officer who was, or is, engaged in that conduct.

Where a disclosure fails to meet **all** of the criteria in (A) above, and at least **one** of the criteria in (B) above, and would not, if proved, constitute a criminal offence or reasonable grounds for dismissing or dispensing with, or otherwise terminating the services of the public officer who was, or is, engaged in that conduct, it will not be assessed as a protected disclosure under the Act.

Where a disclosure is assessed and is determined **not** to be a protected disclosure, the whistleblower is informed and advised that the Institute's normal complaints handling procedures apply.

Where a disclosure **is** assessed as a protected disclosure in accordance with these criteria, the disclosure must be dealt with under the Act.

Following the determination that a disclosure is assessed as a protected disclosure, the Protected Disclosure Coordinator then determines whether the protected disclosure is a **public interest disclosure**.

Public Interest Disclosures

The determination of whether a protected disclosure is assessed as a public interest disclosure must be made **within 45 days of the receipt of the disclosure**.

For a protected disclosure to be assessed as a **public interest disclosure** it must show, or tend to show that the public officer to whom it relates:

- has, is or proposes to engage in improper conduct in their capacity as a public officer **or**
- has, is taking or proposes to take detrimental action in reprisal for the making of the protected disclosure.

The **Protected Disclosure Coordinator**, on behalf of the Institute, must be satisfied that there is sufficient supporting material to demonstrate that the conduct has actually occurred. A mere allegation with no supporting evidence is not sufficient.

Where the protected disclosure is **determined to be a public interest disclosure**, within 14 days of reaching a conclusion,

- Notifies the person who made the disclosure of the conclusion and
- Refers the disclosure to the Ombudsman for formal determination as to whether it is a public interest disclosure.

Where the protected disclosure is **not determined to be a public interest disclosure**, within 14 days of reaching a conclusion,

- Notifies the person who made the disclosure of the conclusion
- Advises the person that they may request the Institute to refer the disclosure to the Ombudsman for a formal determination as to whether it is a public interest disclosure and that **this request must be made within 28 days of the notification**.

All protected disclosures that are assessed by the Protected Disclosure Coordinator as public interest disclosures, must be referred to the Ombudsman who will confirm the assessment and will either instigate an investigation through the Ombudsman's Office, refer the matter to the police for investigation or refer the matter back to the Institute for investigation and reporting back to the Ombudsman upon completion of the investigation.

Where the disclosure relates to the **Protected Disclosure Coordinator**, the **Chief Executive Officer** will assume the role and responsibility of the Protected Disclosure Coordinator.

Where the disclosure relates to the **Chief Executive Officer**, the Protected Disclosure Coordinator will report directly to the **Chairperson of the Institute Board**.

Where the disclosure relates to a member of the **Institute Board**, the Protected Disclosure Coordinator will liaise directly with the Ombudsman.

6. Investigation

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Where the Ombudsman refers a protected disclosure to the Institute for investigation, the **Protected Disclosure Coordinator** appoints an investigator to carry out the investigation.

The objectives of the investigation will be to

- Collate information relating to the investigation as quickly as possible, including steps to protect or preserve documents, material and equipment,
- Consider information collected and draw conclusions objectively and impartially,
- Maintain procedural fairness in the treatment of witnesses and the person who is making the disclosure and
- Make recommendation arising from the conclusions drawn concerning remedial or other appropriate action.

The **Protected Disclosure Coordinator**

- Draws up the terms of references and obtains authorisation for those terms from the Chief Executive Officer.
- Ensures that the terms of reference include
 - The date by which the investigator is to complete the investigation
 - The resources available to the investigator to complete the investigation within the time set
 - Requirement for the investigator to make regular status reports to the Protected Disclosure Coordinator
- Approves a request for an extension of time by the investigator, if reasonable
- Approves the investigation plan prepared by the Investigator
- Informs the Ombudsman of general progress

The **Investigator**

- Prepares an investigation plan for approval by the Protected Disclosure Coordinator which will include
 - List of issues to be substantiated
 - Description of the avenue of inquiry
 - Description of the allegation(s)
 - Description of the possible findings or offences
 - Description of the facts in issue

- The process for conducting the inquiry
- The resources required.
- After commencement of the investigation, notifies the whistleblower that he/she has been appointed to conduct the investigation
- Asks the whistleblower to clarify any matters and to provide any additional material that he/she may have.
- Is sensitive to the whistleblowers possible fear of reprisals and will be aware of the statutory protections provided to the whistleblowers.
- Follows the principles of natural justice concerning procedural fairness.
- Must be impartial in assessing the credibility of the whistleblowers and any witnesses and where appropriate, conclusions, as to the credibility should be included in the investigation report.

The Institute will have regard to the following issues in ensuring procedural fairness

- The person who is the subject of the disclosure is entitled to know the allegations made against him/her and be given a right to respond. This does not mean that the person must be advised of the allegations as soon as the disclosure is made or the investigation commenced.
- If the investigator is contemplating making a report adverse to the interests of any person, that person should be given the opportunity to put forward further material that may influence the outcome of the report and that person's defence should be fairly set out in the report.
- All relevant parties to a matter should be heard and all submissions considered.
- A decision should not be made until all reasonable inquiries have been made.
- The investigator or any decision maker should not have a personal or direct interest in the matter being investigated.
- All proceedings must be carried out fairly and without bias.

During the conduct of the investigation, the **investigator**

- Makes contemporaneous notes of all discussions, phone calls and interviews with witnesses.
- Stores all information securely.
- Conducts interviews in private and takes all reasonable steps to protect the identity of the whistleblower.
- Where the identity of the whistleblower cannot be avoided due to the nature of the allegations, warns the whistleblower and his/her welfare manager of the probability.
- Has the discretion to allow any witness to have legal or other representation or support during an interview. Where a witness has special need for legal representation or support, permission should be granted.

The **Protected Disclosure Coordinator**

- Makes the decision regarding the referral of an investigation to the Ombudsman where on the advice of the Investigator
 - The investigation is being obstructed or
 - The investigation has revealed conduct that may constitute a criminal offence.
 - Ensures the whistleblower is kept regularly informed concerning the handling of a protected disclosure and investigation.
- Reports to the Ombudsman about the progress of an investigation
- Where the Ombudsman or whistleblower requests information about the progress of an investigation, provides the information within 28 days of the date of the request.

7. **Actions taken after an Investigation**

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At the conclusion of the investigation, the **investigator**

- Submits a written report of his/her findings to the **Protected Disclosure Coordinator**. This report will contain:
 - The allegations
 - An account of all relevant information received and if evidence has been rejected as unreliable, the reasons for this opinion being formed
 - If an adverse comment against any person is included, that person's defence is to be also included fairly
 - The conclusions reached and the basis for them and
 - Any recommendations arising from the conclusions, which will include:
 - Steps required by the Institute to prevent the conduct from continuing or occurring in the future and
 - Any action that should be taken by the Institute to remedy any harm or loss arising from the conduct. This action may include bringing disciplinary proceedings against the person responsible for the conduct and referring the matter to an appropriate authority for consideration.

The report must not disclose particulars likely to lead to the identification of the whistleblower.

The transcript or other record of any oral evidence taken, including tape recordings and all documents, statements or other exhibits received by **the Investigator** and accepted as evidence during the course of the investigation, will accompany the report.

Where the **Protected Disclosure Coordinator** is satisfied that the investigation has found that the disclosed conduct has occurred, **the Protected Disclosure Coordinator**

- Recommends to the **Chief Executive Officer** the action that must be taken to prevent the conduct from continuing or occurring in the future.
- May also recommend action required to remedy harm or loss arising from the conduct.
- Provide a written report to the Minister for Tertiary Education, the Institute Board, the Ombudsman and the whistleblower setting out the findings of the investigation and any remedial steps taken.

Where the investigation concludes that the disclosed conduct did not occur, **the Protected Disclosure Coordinator** will report these findings to the Ombudsman and to the whistleblower.

8. **Managing the Welfare of the Whistleblower**

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The Institute is committed to the protection of genuine whistleblowers against detrimental action taken in reprisal for the making of protected disclosures.

The Protected Disclosure Coordinator will appoint a welfare manager to all whistleblowers who have made a protected disclosure.

The roles and responsibilities of the **welfare manager** are outlined under the [Roles and Responsibilities](#) section of this procedure.

All employees are advised that it is an offence for a person to take detrimental action in reprisal for a protected disclosure and that the maximum penalty under the Act is a fine of 240 penalty units or two years imprisonment or both. The taking of detrimental action in breach of this provision can also be grounds for making a disclosure under the Act and can result in an investigation.

The Protected Disclosure Coordinator

- Ensures the whistleblower is kept informed of action taken and the timeframes that apply.
- Ensures that the whistleblower is informed of the objectives and findings of an investigation, the steps taken by the Institute to address any improper conduct that has been found to have occurred, reasons for decisions made by the Institute in relation to the disclosure. All communications will be in plain English.

If a whistleblower reports an occurrence of a detrimental action, **the welfare manager**

- Records the details of the incident.
- Advises the whistleblower of his/her rights under the Act and
- Advises the Protected Disclosure Coordinator or Chief Executive Officer of the detrimental action.

Where detrimental action is reported, the **Protected Disclosure Coordinator** assesses the report as a new disclosure under the Act and these procedures.

Where a person who makes a disclosure is implicated in the misconduct, the Institute will handle the disclosure and protect the whistleblower from reprisals in accordance with the Act, the Ombudsman's guidelines and these procedures.

Consequences for Whistleblowers Implicated in Improper Conduct

The Institute acknowledges that the act of whistle blowing should not shield a whistleblower from the reasonable consequences flowing from any involvement in improper conduct. A whistleblower's liability for his or her own conduct is not affected by his or her disclosure of that conduct under the Act. However, in some circumstances, an admission may be a mitigating factor when considering disciplinary or other action.

The Chief Executive Officer

- Makes the final decision on the advice of the Protected Disclosure Coordinator as to whether disciplinary or other action will be taken against the whistleblower where the whistleblower is implicated in the misconduct.
- Ensures that the disciplinary or other action is undertaken only after the disclosed matter has been appropriately dealt with.
- Is satisfied that it has been clearly demonstrated that:
 - The intention to proceed with disciplinary action is not causally connected to the making of the disclosure as opposed to the content of the disclosure or other available information
 - There are good and sufficient grounds that would fully justify action against any non-whistleblower in the same circumstances and
 - There are good and sufficient grounds that justify exercising any discretion to institute disciplinary or other action.

The Protected Disclosure Coordinator

- Thoroughly documents the process including the reasons why disciplinary or other action is being taken and the reasons why the actions is not a retribution for making the disclosure.
- Clearly advises the whistleblower of the proposed action to be taken and any mitigating factors that have been taken into account.

9. [Management of the Person Against Whom a Disclosure is Made](#) [Back to Top](#)

The Institute recognises that employees against whom disclosures are made must also be supported during the handling and investigation of the disclosures. Appropriate steps will be undertaken to avoid unnecessary damage to that person, particularly as the investigation may totally exonerate him/her from any wrongdoing.

The Institute will take all reasonable steps to ensure the confidentiality of the person who is the subject of the disclosure during the assessment and investigation process.

The **Protected Disclosure Coordinator** may appoint an internal contact or make use of an Employee Assistance Program to ensure persons who are the subject of disclosures are given the appropriate support.

Where investigation does not substantiate the disclosures, the fact that an investigation has been undertaken, the results of the investigation and the identity of the person who is the subject of the disclosure will remain confidential.

The **Protected Disclosure Coordinator** ensures that the person who is the subject of the disclosure is

- Informed as to the substance of the allegations.
- Given the opportunity to answer the allegations before a final decision is made.
- Informed as to the substance of any adverse comment that may be included in any report arising from the investigation and has
- His or her defences set out fairly in any report.

Where the allegations in a disclosure have been investigated and the person who is the subject of the disclosure is aware of the allegations or the fact of the investigation, the **Protected Disclosure Coordinator** will formally advise the person who is the subject of the disclosure of the **outcome** of the investigation. It must be clearly explained that no detail that has any potential to compromise the confidentiality requirements under the Act, or contribute to the identification of the whistleblower can be provided. Disclosure of information in breach of the Act constitutes an offence which is punishable by a maximum fine of 60 penalty points or six month imprisonment or both.

The Institute will give its full support to a person who is the subject of a disclosure where the allegations contained in the disclosure are clearly wrong or unsubstantiated.

If the matter has been disclosed publicly, the Chief Executive Officer will consider any request by that person to issue a statement of support setting out that the allegations were clearly wrong or unsubstantiated.

10. Criminal Offences

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The Institute will ensure officers appointed to handle protected disclosures and all other employees are aware of the following offences created by the Act:

- It is an offence for a person to take detrimental action against a person in reprisal for a protected disclosure being made. *Penalty: Maximum fine of 240 penalty units or two years imprisonment or both.*
- It is an offence for a person to divulge information obtained as a result of the handling or investigation of a protected disclosure without legislative authority. *Penalty: Maximum fine of 60 penalty units or 6 months imprisonment or both.*
- It is an offence for a person to obstruct the Ombudsman in performing his responsibilities under the Act. *Penalty: Maximum fine of 240 penalty units or two years imprisonment or both.*
- It is an offence for a person to knowingly provide false information under the Act with the intention that it is acted on as a disclosed matter. *Penalty: Maximum fine of 240 penalty units or two years imprisonment or both.*

Forms

[Register of Whistleblower Disclosures](#)

Register of Whistleblower Disclosures

The register below records information about disclosures made to the Institute that have been determined to be protected disclosures.

NB: This register must not include any information that may identify the whistleblower.

	File A	File B	File C	File D	File E
Date Disclosure received					
Type of Disclosure					
Is disclosure a public interest disclosure?					
Date above determination made.					
Date WB* informed of determination.					
Date Disclosure referred to Ombudsman.					
Determination made by Ombudsman.					
Was the investigation referred back to the Ombudsman?					
Did the Ombudsman take over the investigation?					
Did WB request the Ombudsman to take over the investigation?					
Findings of the Institute.					
Recommendations made by the Ombudsman.					
Date reporting requirements satisfied.					

* WB refers to whistleblower.