



WHISTLEBLOWING POLICY

(November 2023)

The Office of the COSICA is committed to the highest possible standards of openness and accountability in the delivery of its services. COSICA staff and members of the public should therefore feel assured that they can raise genuine concerns about potential wrongdoing in confidence, through a clear internal whistleblowing process, without putting their position at risk.

Corporate Governance Manager

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Guidance for handling whistleblowing concerns in the Office of the Commissioner

1. INTRODUCTION

- 1.1 This guidance details the process to be followed by any COSICA staff member who receives notification, either orally or in writing (letter or email), of a concern relating to suspected malpractice, risk, abuse or wrongdoing that affects others (a Public Interest Disclosure). A full list of the types of concern covered by Public Interest (Whistleblowing) arrangements is detailed in [The Public Interest Disclosure \(Northern Ireland\) Order 1998](#). These procedures should be read in conjunction with the [NICS Public Interest Disclosure \(Whistleblowing\) Policy](#).
- 1.2 To ensure that COSICA deals with all concerns in a responsive, proportionate and effective way, it is necessary for staff at all levels to know and understand what action is required when they receive a public interest disclosure (whistleblowing concern). The guidance is based on the principle that the COSICA will not tolerate harassment, victimisation or bullying under any circumstances; and that all staff and stakeholders are encouraged to raise genuine concerns in the knowledge that they will not be disadvantaged as a result.

2. WHAT IS A WHISLEBLOWING CONCERN?

All of us, at one time or another, may have concerns about what is happening at work.

- 2.1 A simple way to establish whether or not a concern about a risk, malpractice or wrongdoing falls under whistleblowing is to consider the nature of the concern. If the concern refers to 'others' e.g. the Commissioner, COSICA staff, clients, the wider public, then it is a whistleblowing concern. If the concern relates to an employee raising the concern or the member of the public as an individual 'self' e.g. a personal grievance about terms of employment, pay, unfair treatment then this is not a whistleblowing concern. Consequently, complaints, personal grievances or dissatisfaction in respect of employment issues are not covered by whistleblowing, unless a particular case is in the public interest. Generally, a whistle-blower has no self-interest in the issue being raised. However, each whistleblowing concern must be considered, on a case by case basis, to determine whether it fits within the 'whistleblowing' category.
- 2.2 Similarly, whistleblowing does not cover complaints about COSICA's performance or standards of service, for which separate procedures exist. These are set out in the COSICA Complaints Policy.
- 2.3 If you have any doubt as to whether a concern falls under the category of 'whistleblowing', you should contact the COSICA Accounting Officer (CAO), Fiona Ryan.

3. GENERAL GUIDANCE ON HANDLING A WHISTLEBLOWING CONCERN

Types of public interest disclosures

- 3.1 There are broadly three main types of public interest disclosures that COSICA staff should be aware of:
 - i. disclosures made by COSICA staff;

- ii. disclosures made directly to TEO in relation to the COSICA by a member of the public or an external stakeholder; and
 - iii. disclosures made directly to the Commissioner or COSICA staff by members of the public, employees or workers in external organisations (or their representatives) for which the COSICA has some degree of association and/or responsibility, or individuals in receipt of services directly from COSICA, or organisations representing stakeholders.
- 3.2 Line managers need to understand the process and procedures that apply in each of these scenarios. They are set out separately in the relevant sections, below.
- 3.3 Regardless of the source of the concern (ie, from COSICA staff or from an external source) the following guidance should be followed by COSICA staff who receive a whistleblowing concern:
- have a positive and supportive attitude towards people raising a concern;
 - record as much detail as possible about the concern being raised and agree this record with the person;
 - be aware of the process following the raising of a concern and explain this to the person;
 - make sure the person knows what to expect, for example in relation to feedback on their concern;
 - assure the person that their confidentiality will be protected as far as possible, if they request this;
 - make no promises and manage the person's expectations;
 - make it clear that COSICA will not tolerate harassment of anyone raising a genuine concern and ask the person to let you know if this happens;
 - if the issue is raised by COSICA staff, you should refer the person to available sources of support, for example Protect, the whistleblowing charity (<https://protect-advice.org.uk/>); and
 - pass the information, as quickly as possible, to those responsible for dealing with concerns in the COSICA office; so that the appropriate procedures for consideration and investigation of the concern can be initiated.

Confidentiality

- 3.4 Where possible, all matters raised should be treated confidentially. This includes applying the appropriate information management standards to ensure that neither the identity of the person who has made the disclosure, nor information which may prejudice any investigation, is inappropriately released.

For example, any information provided should not be copied to other parties unless relevant personal details have been removed. A document may have hidden electronic 'properties' containing the author's name or other pertinent details that should be removed before documents are released to other parties.

Access to whistleblowing information

- 3.5 Access to whistleblowing information must only be granted to those who have a genuine business need. COSICA staff should not create their own HPRM Folders for whistleblowing concerns nor store information on their desktop. All information in relation to whistleblowing concerns should be stored centrally in Content Manager containers set up by COSICA Corporate Services (CGB) only, with access controlled by CGB.
- 3.6 Practical steps that you can take to protect the confidentiality of those raising concerns include:
- classifying all information provided, in relation to a whistleblowing concern, as **OFFICIAL-SENSITIVE-PERSONAL** and managing it in line with the guidelines set out the NICS Guide to Physical, Document and IT Security;
 - only printing where absolutely necessary;
 - ensuring that the minimum number of people have access to case files;
 - being discreet about when and where any meetings are held with the person raising the concern; and
 - ensuring that confidential case papers are not left on printers or photocopiers.
- 3.7 Appendix 1 to this guidance provides further instructions on the Information Management procedures to be applied when handling a whistleblowing concern.
- 3.8 While confidentiality should be assured if requested, a manager or a member of staff in receipt of a public interest disclosure should point out potential risks to the person raising the concern:
- colleagues may try to guess the person's identity if they become aware that a concern has been raised; and
 - as the investigation progresses, there may be a legal requirement to disclose the identity of the person raising the concern, for example, under court disclosure rules.

4 GUIDANCE ON MANAGEMENT OF WHISTLEBLOWING CASES

- 4.1 It is the responsibility of the COSICA office to manage any whistleblowing concerns raised directly to them. However, COSICA has a responsibility to notify TEO, as their sponsor Department, without undue delay and to subsequently provide progress updates.

It is also the COSICA's responsibility to perform periodic reviews into awareness of the guidance and procedures and confidence in the effectiveness of their application. COSICA will also provide formal assurance on these matters to TEO as part of the quarterly Assurance Statement process.

- 4.2 The office of the COSICA carries out a wide range of work from assisting victims and survivors on issues surrounding the redress process to ensuring victims and survivors can avail of the appropriate emotional support services. As such, the scope for potential public interest disclosures is also wide ranging and it is therefore not possible to set a strict protocol for handling every disclosure. However, it is essential that the action taken by the COSICA office in each case is proportionate, effective and timely, with accurate records being kept of actions taken and with the rationale for each course of action being clearly documented.
- 4.3 COSICA staff should make themselves aware of the COSICA Code of Ethics.
- 4.4 COSICA staff can also avail themselves of the current NICS guidance relating to Ethics and Whistleblowing, included in the NICS HR Handbook at Section 6.01 (Standards of Conduct) of Chapter 6 (Employee Relations) [NICS Public Interest Disclosure \(Whistleblowing\) Policy](#). This section contains details of the Code; reporting procedures for raising issues which fall within the NICS Code of Ethics; and Public Interest Disclosure ("Whistleblowing").
- 4.5 Sub-section 4 of Section 6.01 (Standards of Conduct) sets out the provisions of the Public Interest Disclosure (NI) Order 1998. It provides guidance on making public interest disclosures and outlines the protection available to staff who do so.
- 4.6 NI Government guidance on whistleblowing can also be found through NI Direct: <https://www.nidirect.gov.uk/articles/blowing-whistle-workplace-wrongdoing>.

5. MANAGING A WHISTLEBLOWING CONCERN RAISED DIRECTLY TO THE ACCOUNTING OFFICER FROM A COSICA STAFF MEMBER (PROCESS MAP 1)

- 5.1 It is recommended that concerns from COSICA staff are raised internally in the first instance, usually through a line manager. Sometimes, explaining the context of an issue to someone contemplating making a public interest disclosure may be enough to alleviate their concerns. Minor issues might be dealt with straight away by line management. Similarly a review by internal audit, as part of planned audit work, might be sufficient to address the issue e.g. through a change to the control environment. Where this is not possible, the following paragraphs provide line managers with guidance on handling disclosures made by members of COSICA staff.
- 5.2 On receipt of a disclosure from an COSICA member of staff, the COSICA staff member who received the concern should follow the following process:
 - i. assess if the concern is whistleblowing (or alternatively a complaint or an HR issue);
 - ii. if the concern is assessed not to be whistleblowing, the staff member should follow the relevant policy, eg NICS grievance policy or COSICA Complaints Policy;

- iii. if it is assessed to be whistleblowing, the staff member should contact the COSICA Accounting Officer (CAO) who will take the lead in managing the whistleblowing process;
- iv. the CAO will assess whether this relates to whistleblowing *and* fraud;
- v. if the CAO considers that the complaint relates to whistleblowing *and* fraud, the CAO will follow the COSICA Fraud Prevention and Response Plan which must include an initial review within 24 hours;
- vi. if it only relates to whistleblowing, the CAO will inform the TEO Senior Sponsor immediately;
- vii. TEO Senior Sponsor will follow their own whistleblowing action plan. TEO Senior Sponsor will also notify TEO Corporate Governance Branch (CGB) immediately. Corporate Governance Branch (CGB) will set up a new HPRM Container (Business areas must not set up their own HPRM folders for Whistleblowing cases or store information on their desktop);
- viii. CAO will acknowledge receipt of the whistleblowing concern (unless this is anonymous). The acknowledgement should be very general in nature, including thanking the individual for raising the concern and confirming that the concern will be looked at by the CAO with an update to be provided in due course;
- ix. CAO through the TEO Senior Sponsor engages the Designated Officer (Andy McCaw at E5.18 Castle Buildings, Stormont Estate, Belfast, BT4 3SL. Telephone: 028 9037 78618 Mobile: 07753 100315, email: andy.mccaw@executiveoffice-ni.gov.uk);
- x. if the concern does not relate to actual or suspected fraud, the CAO, in consultation with the Designated Officer will consider what action should be taken to deal with the matter raised, including if the concern has been raised anonymously. CAO will consult with all relevant parties as the part of the process, and as much information as possible gathered to aid decision making;
- xi. depending on the nature and seriousness of the concerns raised, the CAO, in consultation with the Designated Officer, may engage with the TEO Director of Finance and Corporate Services to consider whether it is appropriate to draw the matter to the attention of the Northern Ireland Audit Office (NIAO), the Department of Finance (DoF), other relevant stakeholders and/or Ministers;
- xii. CAO will also take a decision as to whether the disclosure should be redirected towards the appropriate HR services, such as dignity at work, grievance procedure, etc;
- xiii. CAO decides on whether further action is required; monitors action, provides feedback to whistleblower and updates the Commissioner and TEO Senior Sponsor. Senior Sponsor updates CGB; and

- xiv. CAO closes case and notifies the Commissioner and TEO Senior Sponsor who updates CGB.

5.3 Managing a Whistleblowing Concern raised directly to COSICA office from a member of the Public (Process Map 2)

On receipt of a disclosure from a member of the public, the COSICA staff member who received the concern should follow the following process:

- i. Immediately contact the COSICA Accounting Officer who will take over the management of the concern;
- ii. CAO will assess if the concern is whistleblowing (or alternatively a complaint or an HR issue);
- iii. the CAO will assess whether this relates to whistleblowing and fraud;
- iv. if the concern is assessed not to be whistleblowing, the CAO should follow the relevant policy, eg, NICS grievance policy or COSICA Complaints Policy;
- v. if it relates to COSICA staff conduct, the CAO will engage with the TEO Senior Sponsor to notify the Designated Officer (Andy McCaw at E5.18 Castle Buildings, Stormont Estate, Belfast, BT4 3SL. Telephone: 028 9037 78618 Mobile: 07753 100315, email: andy.mccaw@executiveoffice-ni.gov.uk);
- vi. if the CAO considers that the complaint relates to whistleblowing and fraud, the CAO will follow the COSICA Fraud Prevention and Response Plan which must include an initial review within 24 hours;
- vii. if it only relates to whistleblowing, the CAO will inform the TEO Senior Sponsor immediately;
- viii. TEO Senior Sponsor will follow their own whistleblowing action plan. TEO Senior Sponsor will notify TEO Corporate Governance Branch (CGB) immediately. Corporate Governance Branch (CGB) will set up a new HPRM Container (Business areas must not set up their own HPRM folders for Whistleblowing cases or store information on their desktop);
- ix. CAO will acknowledge receipt of the whistleblowing concern, unless no contact details are provided (for example an address, phone number or email address). The acknowledgement should be very general in nature, including thanking the individual for raising the concern and confirming that the concern will be looked at by CAO with an update to be provided in due course;
- x. if the concern does not relate to actual or suspected fraud, the CAO, in consultation with TEO Senior Sponsor and the Designated Officer will consider what action should be taken to deal with the matter raised, including if the concern has been raised anonymously. The CAO will consult with all relevant parties as the part of the process, and as much information as possible gathered to aid decision making;

- xi. depending on the nature and seriousness of the concerns raised, the CAO, in consultation with the TEO Senior Sponsor and the Designated Officer, may engage with the TEO Director of Finance and Corporate Services to consider whether it is appropriate to draw the matter to the attention of the Northern Ireland Audit Office (NIAO), the Department of Finance (DoF), other relevant stakeholders and/or Ministers;
- xii. CAO will also take a decision as to whether the disclosure should be redirected towards the appropriate HR services, such as dignity at work, grievance procedure etc;
- xiii. CAO decides on whether further action is required; monitors action, provides feedback to whistleblower and updates TEO Senior Sponsor. Senior Sponsor updates CGB; and
- xiv. CAO closes case and notifies TEO Senior Sponsor who updates CGB.

5.4 Managing a whistleblowing concern regarding the Commissioner, raised by a member of the public

On receipt of a disclosure from a member of the public, the COSICA staff member who received the concern should notify the Audit and Risk Assurance Committee (ARAC) Chair (David Small, email: david.small@cosica-ni.org)

The ARAC Chair will then follow the process outlined in section 5.3 above.

5.5 Managing a whistleblowing concern regarding the Commissioner, raised by a member of staff

The COSICA staff member who has the concern should notify the ARAC Chair (David Small, email: david.small@cosica-ni.org)

The ARAC Chair will then follow the process outlined in section 5.3 above.

6 GUIDANCE ON WHISTLEBLOWING CASES MADE DIRECTLY TO TEO IN RELATION TO THE DEPARTMENT OR ITS ALBS BY A MEMBER OF THE PUBLIC OR AN EXTERNAL STAKEHOLDER (PROCESS MAP 3)

When a TEO staff member receives a whistleblowing concern from a member of the public or an organisation representing stakeholders; they should immediately inform the Director (Grade 5)/Senior Sponsor responsible for that area of work.

6.1 TEO will follow their own Whistleblowing Action Plan.

6.2 In relation to a non fraud-related whistleblowing investigation, it will be the TEO Senior Sponsor who will determine when the CAO should be informed that a public interest disclosure concerning its activities has been made and the outcome of any decision relating to investigation.

7 FRAUD RELATED WHISTLEBLOWING INVESTIGATIONS

- 7.1 Once a concern has been determined as whistleblowing, you should then consider whether it relates to an actual or suspected fraud. If it is considered to be fraud related, COSICA's Fraud Prevention Policy & Fraud Response Plan (which includes a reference to the provisions of the Bribery Act 2010) must then be followed.
- 7.2 The fact that it is considered fraud related will affect the type and scope of any investigation required. It is for line management to undertake an initial fact finding exercise. This discreet enquiry must be carried out as speedily as possible and within 24 hours of the suspicion being raised. If the preliminary enquiry confirms that a fraud has been attempted or perpetrated, the facts should be reported immediately to the COSICA Accounting Officer (CAO) who should then notify the TEO Senior Sponsor and Fraud Oversight Manager and the Director of Finance and Corporate Services. Further investigations may involve the Group Fraud Investigation Service (GFIS).

8 NON FRAUD RELATED WHISTLEBLOWING INVESTIGATIONS

- 8.1 If the whistleblowing concern is not fraud related, the Accounting Officer will consult with the TEO Senior Sponsor to determine:
- the nature of the issue that requires investigation; and
 - responsibility for undertaking the investigation.
- 8.2 When considering who should undertake a non-fraud related investigation, the following options should be considered:
- Internal Audit Service (IAS);
 - COSICA's internal auditors where IAS does not undertake the audit function;
 - TEO staff independent of the business area to which the disclosure relates;
 - ALB's staff independent of the business area to which the disclosure relates;
 - independent external investigation;
 - HR Connect; and
 - a combination of one or more of the above, as required.
- 8.3 Having considered the options, it is important that the rationale for the way forward is clearly documented on the case file. The CAO should generally be the person to decide which approach to adopt.

- 8.4 In every case, it is important that investigations are undertaken by people with the necessary expertise, experience and independence. All concerns must be properly and promptly investigated, whether they have been raised directly with the Commissioner or with TEO.
- 8.5 Where it is considered appropriate for a concern to be investigated by an ALB, appropriate protocols and timescales should be established. Responses should be reviewed at a senior level within TEO (Grade 5 or above) to ensure the investigation/review has been properly and thoroughly completed and the recommendations made are appropriate.
- 8.6 Where a whistleblowing disclosure relates to senior members of ALB staff or ALB Board members, TEO will retain ownership of the investigation. Consideration should be given to the role that the ALB Board (and Audit & Risk Assurance Committee) might play in dealing with such cases.
- 8.7 Considerations for any investigative process should include:
- ensuring investigators have the necessary skills;
 - ensuring there is no conflict of interest between the investigator and the issue being investigated (i.e. the investigator should have had no previous involvement with the issue being investigated);
 - ensuring the investigation has clear and well defined terms of reference;
 - setting a clear scope for the investigation and drawing up a detailed investigation plan;
 - clarifying what evidence needs to be gathered and how it will be gathered (document search, interviews, securing computers, etc.);
 - deciding how best to engage with the whistle-blower and to manage their expectations;
 - maintaining sufficiently frequent contact with the whistle-blower throughout the course of the investigation; and
 - ensuring that all investigative work and findings are clearly documented.
- 8.8 When assigning the investigation to the investigation team, the CAO and TEO Grade 5 must establish the scope of the investigation at the outset; and agree this with their line manager (Grade 2/3). Scoping the investigation will include:
- defining the key points to be investigated;
 - identifying people who should be interviewed;
 - stipulating the investigation report should set out findings, conclusions and recommended actions; and

- setting out an estimated timescale for completion and provision of updates; and
- agreeing costs, if appropriate.

8.9 When the investigation is complete, the person who raised the concern should be informed that the investigation has been concluded and, where appropriate, that recommendations have been made to address any issues identified. Under no circumstances can details of disciplinary action taken or recommended against people be provided or discussed with the person who made the disclosure.

8.10 Where the disclosure relates to the Commissioner, and TEO has been informed of the investigation, agreement should be reached on how contact with the whistle-blower will be maintained throughout the investigation. The whistle-blower's views should be taken into account when agreeing these arrangements.

8.11 In all cases, employees who raise concerns should be protected and supported and should not suffer any detriment as a result of bringing forward their concerns. Appropriate and swift sanctions should be taken against employees who victimise individuals raising such concerns. It should be noted that, if an employee's confidentiality is not protected and they suffer detriment as a result, they may be able to seek redress through an Employment Tribunal.

9 MONITORING OF PUBLIC INTEREST DISCLOSURES

9.1 In order to provide CAO and the TEO Senior Sponsor with a clear understanding of the level and impact of public interest disclosures made, a central log is maintained with the purpose of recording and monitoring how many disclosures are received and the action taken to address them.

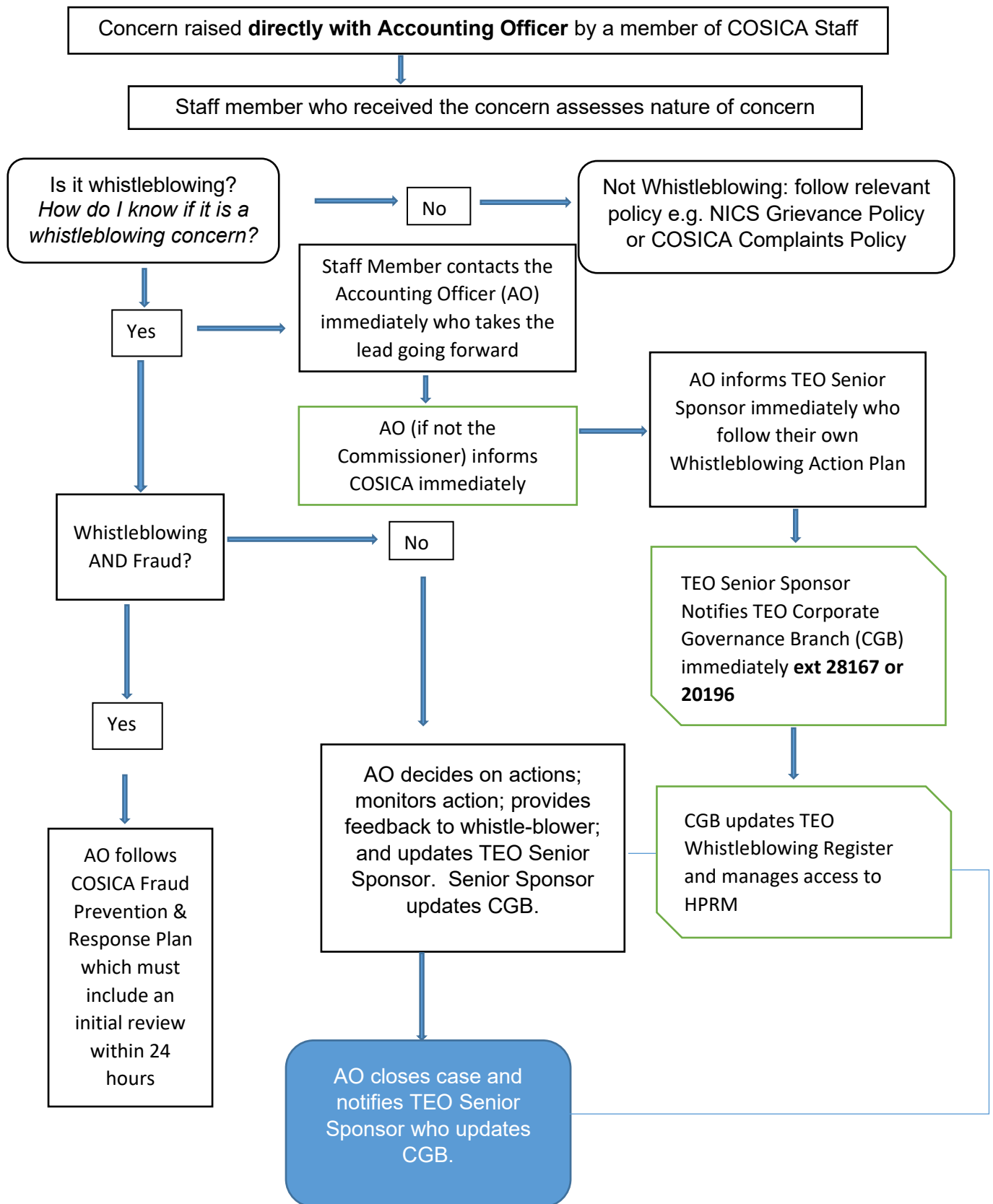
9.2 This log is maintained by Corporate Governance Branch and is held securely. Only the relevant staff in Corporate Governance Branch have access to the information held.

9.3 Upon receipt of a disclosure, the CAO will engage with the TEO Senior Sponsor who will engage with their Director (Grade 5) to advise Corporate Governance Branch immediately by completing and submitting Section A of the Public Interest Disclosure Form (attached at Appendix 2). While it may not be possible to complete Section A of the form in its entirety at the outset, the CAO should provide the TEO Senior Sponsor with as much information as possible. As a very minimum, it should be confirmed that that the disclosure is within their remit and should provide the information sought at points 1 to 6 of the form. The form must then be updated when an investigator is appointed – and information for points 7 and 8 provided.

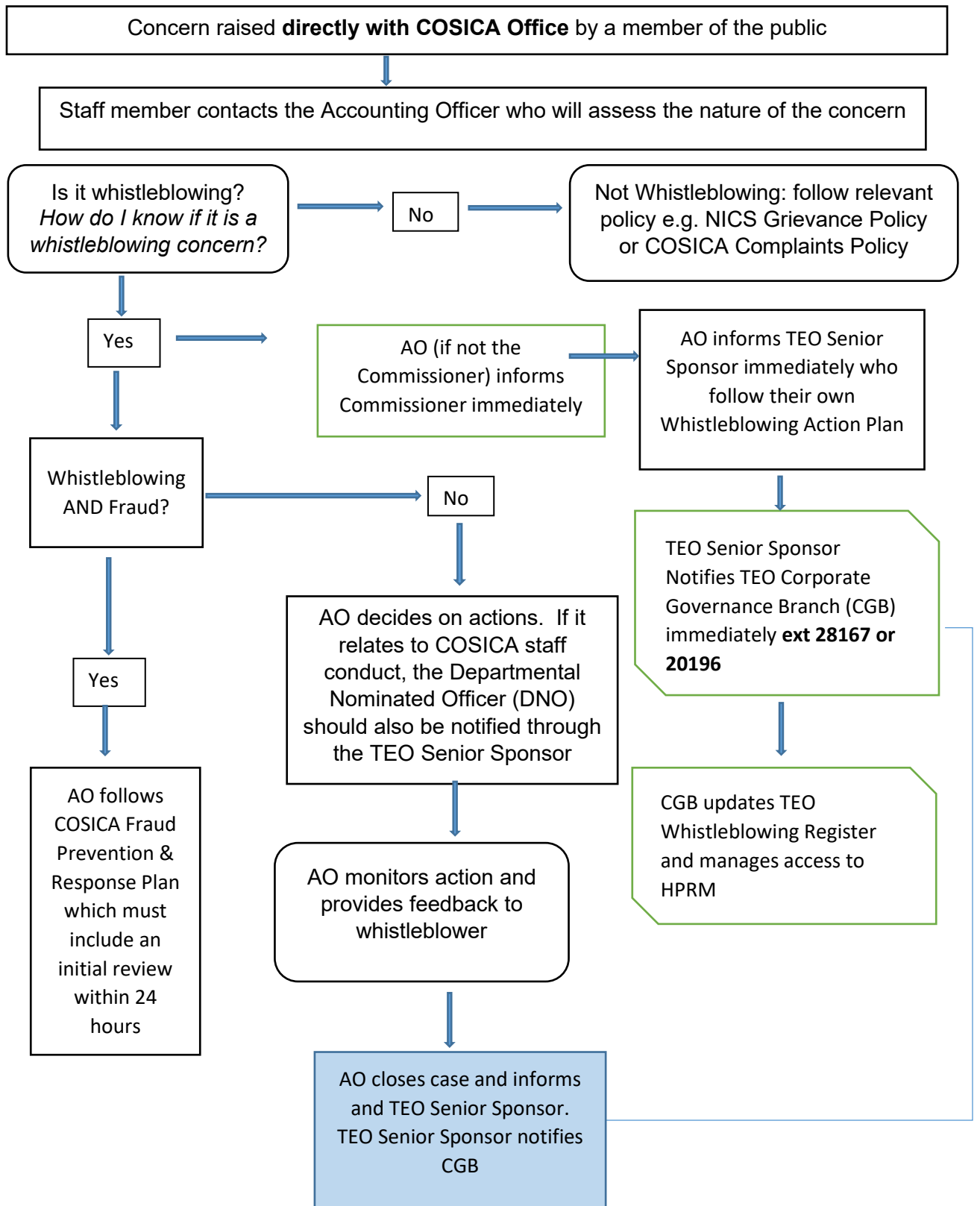
- 9.4 At the conclusion of any non-fraud related investigation, the CAO through the TEO Senior Sponsor should provide Corporate Governance Branch with a summary of the findings and any action taken, by completing Part B of the form. In due course, the CAO through the TEO Senior Sponsor should also confirm that the case has been closed and update the form accordingly. The TEO Senior Sponsor should provide this information by email to the confidential inbox raisingconcerns@executiveoffice-ni.gov.uk.
- 9.5 At the conclusion of a fraud related investigation, the CAO through the TEO Senior Sponsor and TEO Fraud Manager should provide Corporate Governance Branch with a summary of the findings and any action taken, by completing Part B of the form. In due course, the TEO Fraud Manager should also confirm that the case has been closed and update the form accordingly. This information should be provided by email to the confidential inbox raisingconcerns@executiveoffice-ni.gov.uk.
- 9.6 Corporate Governance Branch will analyse the information captured to allow the identification of trends or business risks which may need to be addressed and to provide management with useful information on the operation of whistleblowing procedures, such as:
- the number and types of issues raised;
 - how issues raised were dealt with; and
 - the length of time taken to resolve concerns.
- 9.7 Incidents of whistleblowing occurrences will be contained within the analysis of the TEO whistleblowing caseload and will be reported regularly to the Departmental Accounting Officer, Audit and Risk Assurance Committee and the Board. This will provide assurance to those charged with governance that our whistleblowing arrangements are operating satisfactorily, or will highlight improvements that may be required. The Department will report on the effectiveness of its whistleblowing arrangements in its Annual Report and Accounts.

Should you have any queries in relation to this policy, please contact Fiona Ryan or Joanne McComb.

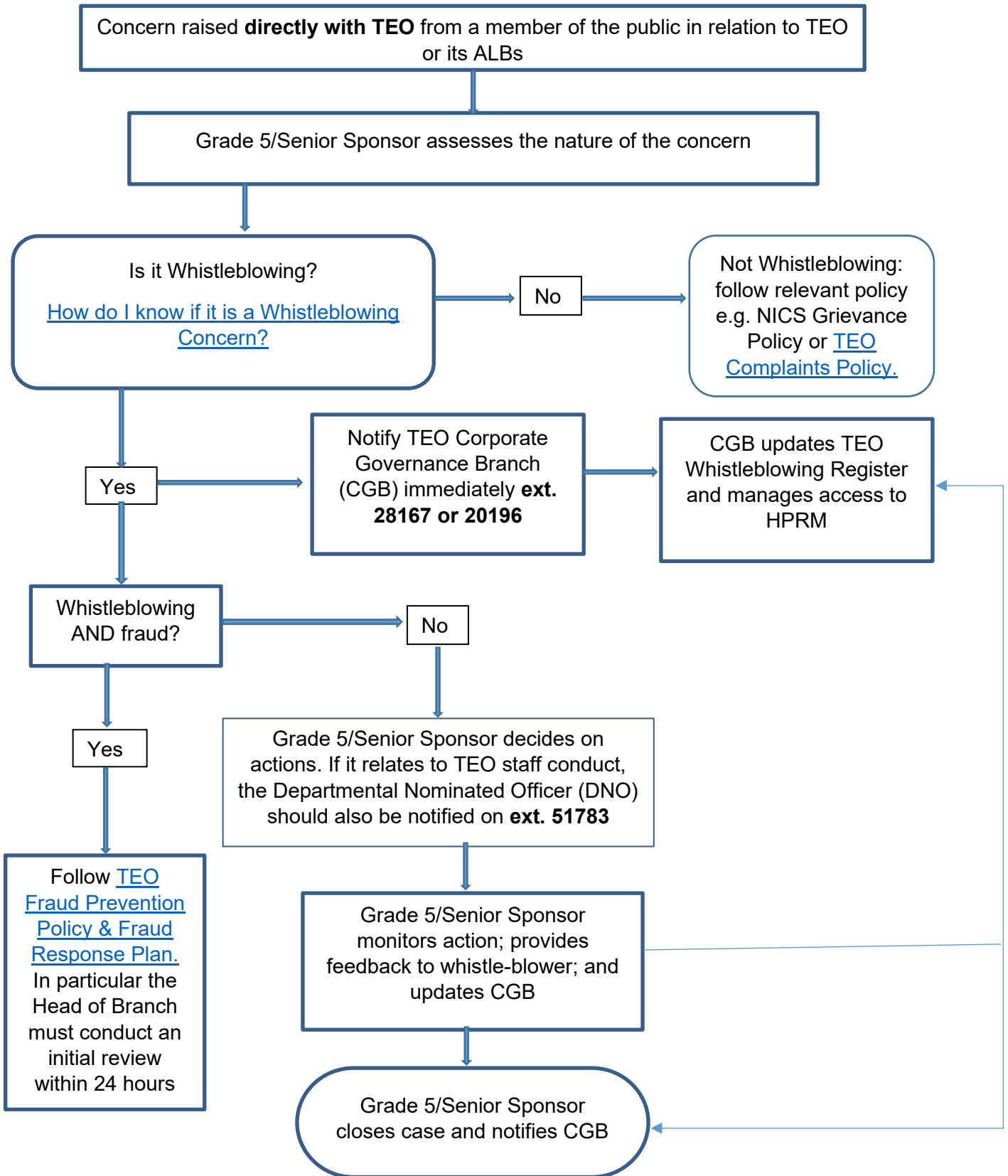
Process Map 1 - Managing a whistleblowing concern from a COSICA Staff member



Process Map 2 - Managing a whistleblowing concern from a member of the public



Process Map 3 - Managing a whistleblowing concern raised directly with TEO by a member of the public in relation to TEO or its ALBs



WHISTLEBLOWING - INFORMATION MANAGEMENT PROCEDURES

1. The procedures for the management of Whistleblowing information have been drafted based on the NICS Guide to Physical, Document and IT Security. All staff should familiarise themselves with the Guide attached at [NICS Guide to Physical, Document and IT Security](#).
2. Classification of Information and Marking - All information in relation to whistleblowing concerns should be classified **OFFICIAL-SENSITIVE-PERSONAL**. The marking should be clearly visible to anyone using or receiving the information. This will mean: including it in the top and bottom of documents; in the subject line or body of emails and in the front of folders or binders. Page 9 of the NICS Guide to Physical, Document and IT Security provides examples.
3. Extra care needs to be taken when handling information that falls within the OFFICIAL-SENSITIVE category, which means:

- ✓ only print where absolutely necessary;
- ✓ take care to be discreet when discussing sensitive issues by telephone, especially when in public areas and minimise sensitive details;
- ✓ store information securely when not in use and use an approved security cabinet;
- ✓ abide by the clear desk policy rule;
- ✓ do not send information to internet email addresses, eg, Gmail, Hotmail;
- ✓ assess the entire contents of an email string before adding to it and forwarding on;
- ✓ send the information by the secure NICS email route or use encrypted data transfers;
- ✓ when adding an address to an email, NICS Active Directory will suggest similar addresses you have used before. Make sure you choose the right address before you click send;
- ✓ use recognised commercial couriers or registered mail if sending hard copy and tamper evident envelopes;
- ✓ only use approved encrypted devices to store information;

4. Reproduction of information, eg, by photocopying or an electronic document forwarded by email, should be kept to an absolute minimum and such material should not be copied to other staff as a matter of routine unless they have a ‘need to know’.
5. Access to whistleblowing information must only be granted to those who have a genuine business need. All information in relation to a whistleblowing concern should be stored centrally in HPRM containers set up by Corporate Governance (CG) only, with access controlled by CG. Whistleblowing concerns should not be saved in a shared drive or on a desktop.
6. When sharing the information for business purposes you should ensure that the receiving party understands the obligations and protects the assets appropriately. This will be done by including the SENSITIVE-OFFICIAL-PERSONAL classification on any correspondence and by including a link to the Guide to Physical, Document and IT Security when you share the information. If there is any doubt about giving access to official sensitive information to other individuals or organisations, you should consult your line manager in the first instance.
7. In certain circumstances there may be a good reason to share selected information from the concern more widely. If required, a redacted version of the document could be shared more widely, subject to approval by Grade 7 over Corporate Services. The whistleblowing concern will more than likely include personal data on either the whistleblower or the individual who is the subject of the concern. When handling personal data provided through a whistleblowing concern, you need to be particularly careful to ensure compliance with the requirements of the General Data Protection Regulations (GDPR). A Privacy Notice has been provided with the Whistleblowing guidance which makes clear the Commissioner’s responsibilities in relation to the personal data provided as a result of the whistleblowing guidance. A link to the Privacy Notice is included <https://www.cosica-ni.org/privacy-notice>.

PUBLIC INTEREST DISCLOSURE FORM

Section A: Disclosure to Completion of Investigation

1	Date disclosure received:	
2	Source of disclosure: (eg, telephone call, email, letter)	
3	Did the whistle blower provide a means for providing feedback? If so, please state the proposed method for providing feedback (e.g. email address, telephone number, address)	
4	Names of officers to whom disclosure was notified:	
5	Division / Branch to which disclosure relates or details of ALB	
6	Date receipt of the whistleblowing concern was acknowledged by TEO/ALB:	
7	Was confidentiality requested?	
8	What approach was adopted? (eg, an internal desk based review, internal audit investigation etc.)	
9	Name of investigator assigned (eg, staff member in GFIS, Internal Audit, TEO (if an internal desk based review) etc:	
10	Date investigator assigned:	
<p>Commence completion of Section B of this form immediately after the investigation has been concluded.</p>		

Section B: Post Investigation Action

11	Date Investigation report received:	
12	Outcome recorded? (was concern founded or unfounded?):	
13	If appropriate, provide details of the financial implications of the disclosure?	
14	Action taken to address issues arising from the disclosure:	
15	Date final decision issued and case closed:	
16	Time taken to complete:	
17	Provide a record of the dates on which feedback was given to the person who made the disclosure:	
18	Was the person satisfied with the outcome? If not, why not?	
19	Business area contact details in case further information is required:	
20	Notes:	