



# The ID Register

## *Whistleblowing Policy*

*Updated May 2019*



## **THE ID REGISTER – Whistleblowing Policy**

### **Policy Statement**

The ID Register Whistleblowing Policy outlines the manner in which employees of The ID Register can report wrongdoing without fear of recrimination.

This policy applies to employees of The ID Register (Guernsey) Limited and The ID Register (Ireland) Limited.

### **Scope**

The purpose of this policy is to provide employees with a safe and secure mechanism for reporting certain categories of wrongdoing without fear of recrimination. This policy outlines: the applicable types of wrongdoing; the manner in which reporting can be made; the process for investigating each disclosure; and the protections afforded employees making such disclosures.

### **Covered Disclosures**

This policy covers relevant information that comes to the attention of the employee<sup>1</sup> in connection with employment in The ID Register and where the employee holds the genuine belief that one of the following categories of wrongdoing has occurred, is likely to occur or is occurring:

- a criminal offence
- failure to comply with any legal obligation, other than one arising under the employee's contract of employment or other contract whereby the employee undertakes to do or perform personally any work or services;
- a miscarriage of justice
- endangerment of the health or safety of any individual

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<sup>1</sup> Employee includes permanent employees, temporary employees and contractors

- the environment has been, is being or is likely to be damaged; and
- concealment of any of the above

This policy does not apply to other grievances such as an employee's personal situation, for example, performance management or conflicts with other staff members. These concerns should be raised through the normal channels as outlined in The ID Register Employee Handbook.

### **Method of Disclosure**

The ID Register understands that it can be difficult to report wrongdoing, particularly where other employees are involved. Notwithstanding this, The ID Register encourages employees to make disclosures to managers within The ID Register at first instance.

### **Contacts for disclosures**

- Martin Mullins – Operations Manager - [martin.mullins@theidregister.com](mailto:martin.mullins@theidregister.com)
- Mark Quigley – Legal Manager - [mark.quigley@theidregister.com](mailto:mark.quigley@theidregister.com)
- David Riordan – Project Manager - [david.riordan@theidregister.com](mailto:david.riordan@theidregister.com)
- Tim Andrews – Director - [tim.andrews@theidregister.com](mailto:tim.andrews@theidregister.com)

Where the employee reasonably believes that such a disclosure will be ignored, involves a member of the management team or that they will experience adverse consequences as a result of the disclosure, a disclosure can be made to The ID Register Non-Executive Director.

- Bryan Atkinson – Non-Executive Director - [bryan@apexfunds.ie](mailto:bryan@apexfunds.ie)

Where a disclosure is made directly to the Non-Executive Director and relates to one or more members of The ID Register management team or board of directors, all reasonable efforts will be made to keep the identity of the employee confidential from the subjects of the investigation.

### **Process and Confidentiality for Internal Disclosures**

Where an internal disclosure is made to any of the above contacts, The ID Register will endeavour to keep the identity of the employee making the disclosure confidential except where the employee is comfortable being identified and/or it is necessary to disclose the employees identity in order to effectively investigate the wrongdoing.

Each internal disclosure will be assessed on its merits and investigated appropriately. The ID Register will aim to share the results of the investigation with the employee, however, this will be a case by case assessment and subject to any legal or confidentiality restrictions.

### **Protections for Internal Disclosures**

Employees who report genuine concerns will not be subject to any adverse consequences in relation to their employment with The ID Register and The ID Register will take all reasonable steps to protect the confidentiality of the employee. The ID Register will not tolerate any victimisation of the discloser.

This protection extends to disclosures made based on a genuine belief even if the investigation ultimately reveals that the purported wrongdoing is not true. This protection does not extend to disclosures made frivolously, in bad faith or for personal gain – such disclosures could result in disciplinary procedures in accordance with The ID Register Employee Handbook.

### **External Disclosures**

In Ireland and Guernsey there are also external channels for making disclosures relating to a regulated Financial Services Business.

### **Guernsey**

The Guernsey Financial Services Commission provides the below email and hotline for reporting misconduct.

+44 1481 748094 / [whistleblower@gfsc.gg](mailto:whistleblower@gfsc.gg)



It should be noted that in Guernsey there is no statutory protection for breaches of confidence by staff of regulated businesses calling the whistleblowing line or sending messages to the whistleblowing email address. Whilst the Commission states that all information provided to the Commission will be treated in the strictest confidence, the Commission cannot guarantee that a whistleblower's identity could not be discovered for example through a Court Order or as a result of an investigation by a law enforcement agency.

## Ireland

Where an employee wishes to make a report to the Central Bank under the 2014 Act relating to breaches of financial services legislation by their employer they may make the disclosure through the following channels.

**E-mail:** confidential@centralbank.ie

**Telephone:** 1890 130014 : Calls are answered Monday to Friday 9.30am - 5.00pm

**Post:** Protected Disclosures Desk, Central Bank of Ireland, PO Box 11517, Spencer Dock, Dublin 1, D01 W920.

The Irish statutory protections for protected disclosures in Ireland are outlined in the below statute and also on the website of the Central Bank of Ireland.

<http://www.irishstatutebook.ie/eli/2014/act/14/enacted/en/html>

<https://www.centralbank.ie/regulation/protected-disclosures-whistleblowing>