

## ACTIVITY CAMPS



# Whistleblowing Policy

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### Monitoring and Review

This policy will be reviewed annually to ensure they remain correct and are fit for purpose. However, the policy may be reviewed and updated at any time to reflect any changes made by Le Mourier or the regulatory authorities or government legislation

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<b>Next review date</b>	November 2025

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## Policy

Le Mourier is committed to achieving our vision of transforming into a centre of excellence, operating to the highest standards. The Company's Staff Code of Conduct is designed to ensure maintenance of such standards.

Le Mourier recognises that the business can only achieve the high standards it sets through the conduct of its employees, however, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring or to address them when they do.

The aims of this Policy are:

- to encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected wherever possible.
- to provide staff with guidance as to how to raise those concerns; and
- to reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This Policy does not form part of any employee's contract of employment, and it may be amended at any time. This Policy applies to all individuals working at all levels of the organisation, including senior managers, officers and directors, employees, part time and fixed term workers.

## What is Whistleblowing?

Whistleblowing is disclosure of information which relates to suspected wrongdoing or dangers at work, as defined by the Public Interest Disclosure Act 1998 (the "Act"). The Act specifies that any disclosure of information, which in the reasonable belief of the worker making the disclosure, tends to show one or more of the undernoted, is a protected disclosure under the Act:

- criminal activity.
- miscarriages of justice.
- danger to health and safety.
- damage to the environment.
- failure to comply with any legal obligation.
- the deliberate concealment of any of the above matters.

A whistle-blower is a person who raises a genuine concern relating to any of the above. It is important to note that the Act only covers protected disclosure by workers. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

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This Policy should **not** be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Policy and Procedure.

If you are uncertain whether something is within the scope of this Policy, you should seek advice from the Whistleblowing Officer whose contact details are at the end of this Policy.

The Company is committed to acting ethically and with integrity in all business dealings and to taking steps to ensure that modern slavery and human trafficking do not exist in any part of our business or supply chains. If you have a concern that there may be a risk of modern slavery or human trafficking occurring within the Company, or in any part of our supply chains, then you are encouraged to raise your concerns using the methods set out below in section 3. More information on the Company's compliance with the Modern Slavery Act 2015 can be found in our Modern Slavery Statement, which is updated annually.

## Raising a Concern

We hope that in many cases, you will be able to raise your concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Le Mourier Management Team.

However, where the matter is more serious and is concerning a safeguarding issue or you feel that your line manager has not addressed your concern, or you would prefer not to raise it with them for any reason, you should contact:

The Children and Families Hub

01534 519000

[childrenandfamilieshub@gov.je](mailto:childrenandfamilieshub@gov.je)

We hope that staff will feel able to voice whistleblowing concerns openly under this Policy. Proper investigation may be difficult or impossible if we cannot obtain further information from you and it can often be difficult to establish if the allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer (Stuart Diack) and appropriate measures can be taken to preserve confidentiality.

Following any disclosure that raises any issues covered in the Safeguarding policy, referrals will be made to the:

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## Jersey Designated Officers

(JDO) 01534 443566

## Independent Safeguarding And Standards

Tele - 01534 443566

Email - [iss@health.gov.je](mailto:iss@health.gov.je)

## Investigation and Outcome

Once you have raised your concern, it will be assessed to determine what initial action or further investigation should be taken. You will be told:

- who is handling the matter.
- how you contact them.
- whether your further assistance will be needed; and
- if you request it, a written summary of your concern and how it will be handled will be provided including the timescales within which you should expect a response, if this is possible.

The person appointed to deal with your allegation will be responsible for deciding at the earliest opportunity on how they will progress with the allegation and must ensure that this is appropriately communicated and documented. They will also ensure that disclosures are logged, monitored and response time frames are provided to you.

Please note that it may not be possible to tell you the precise action taken if this could infringe a duty of confidence owed to someone else. The process will be as open as possible within these constraints.

Following the initial assessment, the Whistleblowing Officer may appoint a team/individual with relevant experience or specialist knowledge should further investigation be deemed necessary. You may be called upon to attend meetings to provide further information.

Whilst we cannot always guarantee the outcome you are seeking; the Company will try to deal with your concern fairly and in an appropriate way. By using this Policy, you can help achieve this.

The aim of this Policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally, and we would encourage you to report such concerns internally first.

The law recognises that in some circumstances, it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, (if ever) be appropriate to alert

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the media. We strongly encourage you to seek advice before reporting a concern to anyone externally.

## **Assurances**

Le Mourier is committed to this Policy. It is understandable that whistle-blowers are sometimes worried about possible repercussions. We aim to encourage openness and transparency and will support staff who raise genuine concerns under this Policy even if they turn out to be mistaken.

Staff should not suffer any detrimental treatment because of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Policy and Procedure.

If however, Le Mourier concludes that a whistle-blower has made false allegations maliciously, or with a view to personal gain, the whistle-blower will be subject to disciplinary action.

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## Document Control

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