

LOCOG ‘Speak up’ policy

Introduction

1. At LOCOG we are committed to the highest standard of employment practices and want to encourage a climate and culture of openness. This means that we will listen when an employee raises a genuine concern in good faith, and we will respond by investigating the concern and addressing the issue appropriately.

Scope

2. This policy is designed to encourage LOCOG employees to raise concerns which are not covered by disciplinary or grievance procedures either at a high level internally, or, if that is not appropriate, externally. Everyone should feel able to speak up and disclose information which they believe shows malpractice or wrongdoing within LOCOG.

3. Examples of the types of issues regarded as ‘malpractice’ or ‘wrongdoing’ for the purpose of our policy are set out below, although this list is not meant to be exhaustive: -

- Fraud or financial irregularity
- Corruption and bribery
- Improper conduct such as bullying, harassment, discrimination or blackmail
- Unethical behaviour
- Breach of internal policy
- Criminal offences
- Endangering the environment
- Inappropriate use of websites
- Endangering the health or safety of any individual
- Failure to comply with legal or regulatory obligations
- Concealment of information relating to any of the above

How do I raise a concern?

6. If you believe something is not right, you should speak up by raising your concern internally with your line manager or the Head of Risk Assurance (“HRA”), or externally with an independent third party. Each of these routes is described below.

7. Whether you disclose your concern internally or externally you will qualify for protection under existing legislation. The Public Interest Disclosure Act 1998 states that individuals who act in the public interest by “blowing the whistle” on wrongdoing must be protected against any detrimental response by their employers. Retaliation against any LOCOG employee for the good faith reporting of a suspected violation of law or policy or for participating in any investigation of a suspected violation will not be tolerated.

Raising your concern internally at LOCOG

8. In the first instance you should discuss your concern with your immediate line manager. You may subsequently be asked to follow up your discussions by setting

out the background and history of the concern in writing. The manager should acknowledge what you have disclosed, and then report it to the Head of Risk Assurance (HRA)

10. If you have a concern that you do not feel able to discuss with your own line manager, you should report the matter direct to the HRA.

11. Where reasonably practicable the HRA will follow the steps below:

- Obtain full details and clarifications of the concern from the person raising it and evaluate what further action is appropriate;
- If so decided, investigate fully with assistance, where appropriate, from other individuals;
- If any other member of staff is implicated, inform the person(s) as soon as is practically possible. Anyone who raises a concern or is the subject of one has the right to be accompanied by a trade union representative (if a member of a trade union) or colleague at any future interview or hearing relating to the concern.
- The HRA should consult with the Chief Executive Officer (CEO), the Chief Financial Officer (CFO) and the external auditors as appropriate. In matters of fraud, the Fraud Response Group may be convened in accordance with the Anti-Fraud Policy and the investigation will then be conducted in line with that policy.
- On completion of the investigation the HRA will provide a written report with the findings of the investigation, recommendations as to action, if any, and the reasons for the recommendations. The report will be passed to the CEO and the CFO as appropriate.
- The HRA together with the CEO and the CFO will decide what action to take, if any. If the concern needs to be addressed or rectified, then the appropriate LOCOG procedures will be invoked.
- If appropriate, a copy of the outcome will be passed to the LOCOG external auditors to enable a review of relevant procedures.

Raising your concern externally

12. LOCOG recognises that employees may find it difficult to report concerns of malpractice and wrongdoing to their work colleagues. As an alternative, the Company has, therefore, made arrangements for concerns to be reported in strict confidence to either the external specialist organisation, Expolink, or to the Chair of the LOCOG Audit Committee, currently Mr Martin Stewart.

13. Reports can be made through Expolink by calling a FREE confidential helpline - 0800 374199; by email - hotline@expolink.co.uk; or via the internet - www.expolink.co.uk. To use web-based reporting the log on code is LOCOG2012. The helpline is available 24 hours a day, 7 days a week.

14. Reports can be made to Mr Stewart by calling 07802 933 625 or by emailing martindstewart@gmail.com.

15. Any disclosure you make will be treated confidentially and, if you wish, anonymously. In both instances, the disclosure will be passed to the HRA who will follow the steps set out in paragraph 11 above. An indication of how LOCOG proposes to deal with the matter will be given within 21 days where reasonably possible. An indication of the likely time-scales involved in providing a final response

will also be provided. If it is not possible for initial enquiries to be completed within 21 days Expolink or Mr Stewart will provide telephone feedback to explain the situation. If a decision is made not to investigate, an explanation will be provided of the reasons for the decision.

16. In addition to the above, staff are able to make a disclosure to various authorised external organisations which are listed on www.pcaw.co.uk/law/lawregulatorses.htm.

Taking care of our staff

17. Anyone raising a concern or implicated in an investigation will be dealt with sensitively and, to the fullest extent appropriate, should be kept informed of the progress of the investigation and of the final outcome. We believe it is essential that genuine concerns are addressed and will work with all those involved to protect the rights of everyone and ensure that appropriate action is taken.

Anonymity

18. We will treat all disclosures with the utmost confidence and will do everything possible to protect a person's identity when a concern is raised and the individual does not want his or her name disclosed. It is important to note, however, that unless expressly stated that a person wishes to remain anonymous, the investigation process may reveal the source of the information and a statement may be required as part of the evidence.

19. We strongly encourage individuals to put their name to any disclosure they make and concerns expressed anonymously will be considered at LOCOG's discretion. In exercising this discretion, LOCOG will take into account whether the matter raised is significant to LOCOG's business, the credibility of the concern, the seriousness of the issues raised, the likelihood of obtaining the necessary information and of confirming the allegation from other sources.

20. If you are contemplating speaking up and you are in doubt as to your legal rights, you should consider obtaining independent legal advice from an appropriately qualified advisor. You could also contact Public Concern at Work, a charity specialising in providing advice for whistleblowers, on 020-7404-6609 or visit their website, <http://www.pcaw.co.uk/>.

Contacts

If you have any questions on this policy, please contact the Head of Reward, Policy & OD, Rob Clarke, on 2403, or the Head of Risk Assurance, Mary Hardy, on 2842.

Related policies

Staff handbook – in particular the section on Ethics
Anti-fraud policy
Gifts and Gratuities policy
Conflicts of Interest