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# WHISTLEBLOWING POLICY

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## Key Points

The Whistleblowing Procedure sets out the framework for dealing with allegations of illegal and improper conduct.

JEM CiC (JEM) is committed to the highest standards of transparency, probity, integrity and accountability.

This procedure is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged.

This procedure does not replace other policies and procedures such as the complaints procedure, the Grievance and Harassment and Bullying Policies and other specifically laid down statutory reporting procedures.

This procedure is intended to ensure that the company complies with its duty under the Public Interest Disclosure Act 1998.

## Scope

This procedure applies to all employees, including Associates and contractors.

This procedure does not replace other policies or procedures. For example, if an employee has a grievance about their working conditions they should use the Grievance Policy or, if they felt that their manager or a colleague was treating them unfavourably, they should use the Harassment and Bullying Policy. Similarly if an employee has a concern about the conduct of a fellow employee in the working environment (e.g. that they are not treating colleagues with respect) they should raise these with their line manager, or if that is not possible, with the Directors.

This procedure applies to, but is not limited to, allegations about any of the following: