

Guernsey Island Games Association LBG

Whistleblowing Policy

Contents

1. Background and purpose
2. Scope
3. Definitions and abbreviations
4. Reporting and Standards
5. Roles and responsibilities
6. Policy adherence - consequence management
7. Implementation and training

1. Background and Purpose

1.1. The purpose of this Policy is to provide all Guernsey Island Games Association (GIGA) Officers, GIGA Member Organisations, Volunteers and Third Parties (as defined below under Section 3., Definitions) with a mechanism for reporting concerns (also defined below) outside of the normal management reporting channels.

2. Scope

2.1. This Policy applies to all GIGA officers, Member Organisations, Volunteers and Third Parties and should be regarded as the minimum standard requirement.

3. Definitions

3.1. Definitions:

Board - means the Management Board or the Board of Directors of GIGA.

Concerns - means a suspicion of or actual knowledge of any of the following behaviours in a work-related context:

- (a) questionable or improper accounting or processing matters;
- (b) violations of GIGA's policies;
- (c) breaches of regulatory requirements;

GIGA Whistleblowing Policy Version 1 for Member agreement 11 March 2025

(d) illegal and/or dishonest activities; or

(e) any other wrongdoing at work.

Officer - means a GIGA Director or an individual appointed to exercise powers under the authority of the Board

Member Organisations - means those sporting bodies admitted as Members of GIGA

Volunteers – means those individuals, excluding Board Members and individuals who are working with Member Organisations, who have chosen to support the activities of GIGA on a voluntary basis

Third Party - means those parties connected but not part of the GIGA organisation, including:

(a) contractors;

(b) persons working under the supervision and direction of contractors, subcontractors, and suppliers; or

(c) former officers;

Whistleblower - means the person that reports a concern.

Whistleblowing - means the reporting of a concern.

4. Reporting and Standards

4.1 Reporting

4.1.1. All Officers, Member Organisations, Volunteers and Third Parties are encouraged to report concerns and should feel no restraint in doing so.

4.1.2. The Whistleblower is not responsible for investigating concerns or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

4.1.3. All Officers, Member Organisations, Volunteers and Third Parties must follow the Whistleblower procedure when reporting a Concern.

4.1.4 The Whistleblowing reporting procedure for the raising of a concern should be to a GIGA director who is independent of the concern itself and who can therefore objectively consider the matter raised.

4.1.5 The GIGA Director who has received the information relating to a concern is responsible for documenting the matter and bringing it to the attention of the Chair and remaining Board Members

who are also independent of the incident as soon as possible.

4.1.6. This sub-set of the Board will then consider the appropriate action to respond to the incident and any measures that might remediate the situation presented.

4.2. Standards

GIGA supports the highest standards of ethical behaviour in its activities and encourages the safe reporting of any incident or concern that a GIGA Officer, Member Organisation, Volunteer or Third-Party feels should be brought to the attention of GIGA.

4.2.1 No retaliation

a) No Officer, Member Organisation, Volunteer, Third Party or other person (as defined below) who reports a Concern whilst acting in good faith shall be subject to retaliation or to other adverse consequences.

b) Anyone who retaliates against a Whistleblower will be subject to disciplinary measures including but not limited to dismissal and administrative sanctions.

4.2.2 Acting in good faith

The Whistle-blower must act in good faith and must have reasonable grounds for a Concern. The act of reporting a Concern that proves to be unsubstantiated, malicious, reckless, or with the foreknowledge that the allegations made in the report are false, will be viewed as a serious disciplinary offence and may result in disciplinary measures including but not limited to dismissal and administrative sanctions.

4.2.3. Confidentiality

a) Reports of Concerns, and investigations pertaining to these, must, as far as possible, be treated as confidential. The identity or any information relating to the Officer or Third Party shall not be disclosed to anyone beyond authorised persons without their explicit consent.

b) Disclosure of reports of Concerns to individuals without a need to know will be viewed as a serious disciplinary offence and may result in disciplinary measures including but not limited to dismissal and administrative sanctions. Such conduct may also give rise to other actions, including civil lawsuits.

4.2.4 Position of Whistleblower

Whistleblowers raising a Concern whose own conduct is implicated in the Concern will not be given any automatic immunity from investigation, disciplinary action, criminal prosecution and/or civil liability. The same applies to any other Officer or Third Party that provides information, causes information to be provided, or who otherwise assists an investigation.



GIGA Whistleblowing Policy Version 1 for Member agreement 11 March 2025

4.2.5. Policy deviations

Any specific deviation from this Policy must be subject to prior approval by the Chairperson.

5. Roles and Responsibilities

5.1. Board of Directors - the GIGA Board is the required approval body for material changes to this Policy and is ultimately responsible for setting the tone and culture of GIGA to facilitate the proper operation of this Policy.

6. Policy Adherence - Consequence Management

6.1. Not complying with this Policy may result in internal and/or external disciplinary measures including but not limited to financial penalties, dismissal, administrative and/or criminal sanctions.

7. Implementation and Training

7.1. The Chair is responsible for the implementation of changes to this Policy when deemed necessary and to ensure that the arrangements described in the Policy are put in place within three months of its agreement by the Board.

7.2 The Chair will also co-ordinate any training arrangements which are considered appropriate to support the implementation of the Policy as amended.

7.3. This Policy will also be published on the GIGA website.