

Whistleblowing Policy

April 2025

Organisations this policy applies to	London Legacy Development Corporation and its associated entities
Date	April 2025
Purpose of issue	Updated to include new Chief Operating Officer role and to reflect changes to subsidiaries
Title	Whistleblowing Policy
Description	Our whistleblowing policy aims to ensure that Board Members and all colleagues are able to report any issues, concerns or wrongdoing related to LLDC and its associated entities which they believe need to be brought to the attention of management without fear of reprisal. LLDC encourages external parties to raise any concerns they have about wrongdoing at LLDC or its associated entities.
Author	Rachel Massey
Location	LLDC intranet, website
Contributors	Programme Management Office (PMO); People and Organisational Development
Distribution	All colleagues (via the intranet)
Status	Published
Protective marking	Not Protectively Marked

Version control

Version	Date	Description	Author
v1.0	June 2012	First published version	
V2.0	June 2014	Review of policy for Audit Committee approval	Oliver Shepherd
V3.0	June 2016	Review of policy for Audit Committee approval	Oliver Shepherd
V4.0	July 2018	Review of policy for Audit Committee approval	Oliver Shepherd
V5.0	November 2019	Review of policy for Audit Committee approval	Marion O'Donnell
v.6.0	July 2022	Review of policy for Audit Committee approval including information about reporting hotline for colleagues, and details of how public, partners and Members can raise any concerns	Rachel Massey
v.7.0	June 2024	Review of policy for Audit Committee approval	Rachel Massey
V8.0	April 2025	Updated for the new Chief Operating Officer role and changes to subsidiaries and other operational changes	Rachel Massey

1. OUR AIM

- 1.1. The London Legacy Development Corporation (LLDC) and all its associated entities aims to promote and pursue high standards of employment practices and encourage a climate and culture of openness in the workplace. Our whistleblowing policy aims to ensure that Members and all colleagues (including contractors, temporary staff, interims, agency workers, secondees and volunteers) are able to report any issues which they believe need to be brought to the attention of management without fear of reprisal. LLDC also encourages external parties to raise any concerns they have about wrongdoing at LLDC or its associated entities.
- 1.2. This policy sets the standards that will apply throughout the Corporation and its entities and incorporates the Corporation's legal obligations (including the protection afforded to whistleblowers under the Public Interest Disclosure Act 1998). When referring to the LLDC in this policy we are also referring to, and including the following LLDC entities and subsidiaries unless stated otherwise:
 - Stratford Waterfront Management Company Ltd¹
 - Stratford East London Developments Ltd
 - Stratford Waterfront Retail Management Company Ltd
 - Pudding Mill Legacy Development Ltd

2. POLICY STATEMENT

- 2.1. LLDC is committed to encouraging a climate and culture of openness in all areas of operation. LLDC recognises that effective and honest communication is essential to its success and acknowledges that colleagues may have difficulty in communicating circumstances where they are aware of suspected wrongdoing or malpractice within the organisation. This policy confirms to LLDC colleagues that they can disclose their concerns without fear of recrimination.

3. IMPLEMENTING THE POLICY

- 3.1. LLDC and its entities are committed to dealing with wrongdoing and malpractice immediately, addressing the causes and putting in place preventative measures to avoid recurrence in the future. LLDC will treat all disclosures with the utmost confidence and will do everything possible to protect individual identities when a concern is raised and the individual does not want their name disclosed. It must be appreciated, however, that the investigation process may reveal the source of the information and a statement may be required as part of the evidence.
- 3.2. This policy also seeks to balance the need to provide safeguards for colleagues who raise genuine concerns about wrongdoing and malpractice in the public interest, against the need to protect other colleagues against uninformed or vexatious allegations, which can cause serious difficulty to innocent individuals. Personal grievances such as bullying, harassment and discrimination are not covered by whistleblowing law or this policy, unless the case is in the public interest. If a concern is raised through the whistleblowing process that would be more properly dealt with through the LLDC's grievance procedure, it will be referred to the People Organisational Development team.
- 3.3. Whistleblowing refers to reporting certain types of issues in the public interest. The types of matters regarded as wrongdoing or malpractice for the purpose of LLDC's policy are as follows but are not meant to be exhaustive: -
 - Fraud or financial irregularity

¹ No longer an LLDC subsidiary; LLDC is a member of the company. E20 Stadium LLP, Stratford East London Holdings Ltd and London Stadium 185 Limited were LLDC subsidiaries until 31 March 2025 and were covered by this policy.

- Corruption, bribery or blackmail criminal offences
- Endangering the environment
- Endangering the health or safety of any individual
- Modern slavery and people trafficking
- Failure to comply with legal or regulatory obligations
- Concealment of information relating to any of the above

4. PROCEDURE FOR MAKING AN INTERNAL DISCLOSURE

- 4.1. Where a colleague has a concern about a matter involving an LLDC colleague, sub-contractor or partner they should, in the first instance, report the matter to their immediate line manager or a director, setting out the background and history of the concern. The line manager or director should acknowledge the disclosure and then report it to LLDC's Chief Operating Officer who will decide how the matter raised should be dealt with. As soon as the matter is reported to LLDC's Chief Operating Officer, the manager or director should also send the following information to LLDC's PMO:

- the date/time of the disclosure
- the department to which the disclosure relates.

This is purely so the incident can be recorded, no other details should be disclosed. Where the reports are of a serious nature, the Audit Committee will be informed and kept updated, whilst maintaining the confidentiality of the whistleblower. Any whistleblowing incidents will be recorded in high level in the Annual Governance Statement in the Annual Report and Accounts.

- 4.2. In the event that the colleague has a concern that they do not feel able to discuss with their own manager, they should report the matter direct to the LLDC's Chief Operating Officer. If an LLDC colleague has a concern that they would rather not report to their line manager, a director or the LLDC Chief Operating Officer they can report their concern to the Chief Executive of LLDC, Chair of the LLDC Board or Chair of the LLDC Audit Committee.
- 4.3. Concerns can be raised anonymously, and LLDC has a reporting service called *Ethicspoint* run by an external third party under contract to the GLA family. Concerns can be reported by phone on 0800 249 4584, or online via <https://glagroup.ethicspoint.com>. Reports can be raised anonymously, although contact information is needed if the person making the report wishes to be kept informed of how the report is being progressed.
- 4.4. A disclosure will qualify for protection under existing legislation if, in the reasonable belief of the individual, it relates to one or more of the actions mentioned in 3.3 above. LLDC will protect any colleague who makes such a disclosure whether or not the concern raised is upheld. While LLDC will protect individuals who raise public interest concerns, disciplinary action may be taken against an employee who makes a malicious or knowingly false claim.
- 4.5. Any concern raised under this policy will be investigated thoroughly and promptly.

5. PROCEDURE FOR MAKING AN EXTERNAL DISCLOSURE

- 5.1. Where colleagues make an external disclosure to a prescribed person, instead of to their employer or via internal procedures, they will still qualify for protection under existing legislation if, in the reasonable belief of the individual, it relates to one or more of the actions outlined above. Disclosures can be made to the Comptroller and Auditor General (prescribed person) at the National Audit Office; the hotline number for the public is 020 7798 7999, the weblink for information is <https://www.nao.org.uk/contact-us/whistleblowing-disclosures/>. Background on the responsibilities of the Comptroller and Auditor General is at <http://www.nao.org.uk/about-us/what-we-do/>

- 5.2. Where an individual is contemplating making a disclosure and they are in doubt as to their legal rights, they should consider obtaining independent legal advice from an appropriately qualified advisor. They can 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>.
- 5.3. A list of other bodies authorised to receive whistleblowing disclosures is at <http://www.legislation.hmso.gov.uk/si/si2003/20031993.htm>

6. REPORTING ROUTES FOR PUBLIC, PARTNERS AND BOARD MEMBERS

- 6.1. Concerns can be raised using the routes below. If the concern is about something in the public interest, it will be passed to the Chief Operating Officer.
- 6.2. Members of the public should normally use LLDC's complaints process, detailed on the website [here](#) or contact LLDC at customerservices@queenelizabetholympicpark.co.uk, either setting out their concern or asking for the contact details of the Chief Operating Officer to contact them directly. If a member of the public is not comfortable reporting concern to LLDC, it can be reported to the relevant external body.
- 6.3. Partners should normally raise any concerns with their LLDC contract or project manager in the first instance. Alternatively, they can contact the Chief Operating Officer directly.
- 6.4. Board members should raise their concern with the Senior Leadership Team member in the relevant area in the first instance. Alternatively, they can contact the Chief Operating Officer directly.