

Royal Mail Group

Speak Up (Whistleblowing) Policy

Royal Mail Group is committed to conducting business with the highest standards of honesty, integrity and openness where our employees feel able to raise concerns internally. This policy outlines how employees can raise genuine concerns about wrongdoings at the earliest possible stage and in the right way.

Main topic areas

- Overview
- Policy statement
- What is Whistleblowing?
- Confidentiality and protection of workers
- Underpinning legislation
- When should concerns be raised?
- How should concerns be raised?
- Other routes to raising concerns
- How should concerns be dealt with?
- Investigation outcome
- Responsibilities
- Where to go for further information
- Forms
- Related documents

Getting help

Contact your line manager if you have any queries about this policy.

Line managers can obtain advice by:

Calling the HR Services Advice Centre on **GRO**

Managers working for Parcelforce Worldwide should call **GRO**

For web access go to:
<https://www.psp.royalmailgroup.com>



Speak Up (Whistleblowing) Policy

Overview

This policy applies to all employees of Royal Mail Group Ltd unless stated otherwise within the policy. 'Royal Mail Group Ltd' will be referred to as 'Royal Mail Group'.

Employees working for Post Office Ltd should refer to their own Speak Up Policy.

This policy is effective from 28 April 2012.

This policy does not form part of contracts of employment. Royal Mail reserves the right to amend this policy from time to time.

Policy statement

The Speak Up (Whistleblowing) Policy sets out the process by which workers, i.e. employees and others who are contracted to personally perform work on behalf of Royal Mail Group, can raise concerns in confidence and if required, anonymously, about serious malpractice in the organisation, in the knowledge that concerns will be acknowledged and action taken where appropriate.

Any worker who raises a legitimate concern in good faith under this process will not in any way be liable to disciplinary action or loss of benefits, rights or prospects as a result of their action.

Disciplinary action may be taken against any worker who is shown to have used whistleblowing procedures to make malicious or misleading allegations.

What is whistleblowing?

Whistleblowing refers to the disclosure by an employee of serious, potentially criminal matters that have taken place or are taking place within the organisation, to a line manager, independent manager or external body.

Confidentiality and protection of workers

Confidentiality is not the same as anonymity. Workers who raise concerns via whistleblowing procedures are sometimes understandably concerned about their position, and may wish to remain anonymous.

However, it is often difficult to conduct an effective investigation without being able to discuss it fully with the person who raised the concern. Consequently, although the helpline staff will ask callers if they are willing to provide a contact name and number, callers do not need to provide contact details.

Although the business will attempt to investigate anonymously raised concerns wherever possible, practical difficulties may prevent investigations from being undertaken in certain cases.

Underpinning legislation

Workers are protected by the legislation, *Public Interest Disclosure Act*, which provides workers who raise a concern with the right not to suffer any detriment by the employer if they raise a concern (make a protected disclosure).

The Public Interest Disclosure Act identifies protected disclosures as those which are made in good faith and are reasonably thought to show one or more of the following:

- That a criminal offence has been committed, is being committed or is likely to be committed
- That a person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject

- That a miscarriage of justice has occurred, is occurring or is likely to occur
- That the health or safety of any individual has been, is being or is likely to be at risk
- That the environment has been, is being or is likely to be damaged; or
- That information about any of the above matters is being, or is likely to be, deliberately concealed

A disclosure will not qualify as protected if the person making the disclosure commits an offence by making it.

When should concerns be raised?

Concerns should be raised if they are in the organisation's interest to investigate and resolve.

Some examples of situations where a worker may raise a concern are:

- Fraud
- Giving or taking of bribes
- Financial malpractice
- Misreporting
- Practices that might put individuals or the environment at risk

How should concerns be raised?

We hope that employees are able to tell Royal Mail Group about any concerns to provide the business with the opportunity to solve the issue appropriately. In the first instance workers should raise concerns with their line manager, or a senior HR manager in Royal Mail Group. They will either act on the information given to them, or pass it to the relevant person who can deal with it.

Alternatively, the business provides a specialist help line to offer advice and address certain types of concern. Details of these are contained in the 'where to go for more information' section of this policy.

Royal Mail Group will try to inform the worker of the results of investigations or actions taken wherever possible. However, in order to protect the confidentiality of third parties, this may not always be possible.

Other routes to raising concerns

InTouch MCS Ltd

It is recognised that sometimes raising a concern directly with the business will not be possible, for example, if the worker considers that the line management may be involved in the issue or if they have a concern about confidentiality.

In such instances workers should contact the "Speak Up" confidential helpline, which is run by InTouch MCS Ltd, a third party supplier. Access to the helpline can be made by phone or via an on-line web service. InTouch will treat concerns in complete confidence and the worker does not have to provide contact details.

The worker will be requested to provide information about their concern, for example the history of the concern, relevant individuals and the reason why they are particularly concerned about the situation.

There is no requirement to provide contact details. However, not providing details may reduce the business' ability to make a thorough investigation into the concerns raised. All calls to the Speak Up helpline will be acknowledged within five working days.

How should concerns be dealt with?

Details of the concern raised will be forwarded to Royal Mail Group who will act on it in the most appropriate way. Concerns will be reviewed and prioritised depending on the issue. Any resulting investigations will be made by people with appropriate authority who have the technical and professional knowledge required for the particular case. Serious issues will be investigated independently with the most serious investigated externally

It is possible that the business may wish to directly contact the worker to request additional information. This will be done only where the worker has given express consent and is happy for a representative from Royal Mail Group to speak directly to them. In all cases the individual's concern will be treated sensitively and in confidence.

Where concerns about serious malpractice are raised through other routes, such as other business helpdesks, and the concern would appear to be sufficiently serious to be covered by the Public Interest Disclosure Act, this should be investigated and managed in line with this policy.

Investigation outcome

Royal Mail Group does not have to inform a worker who raises a concern of the outcome of any investigation and, in some cases, Royal Mail Group may need to protect the confidentiality or rights of other individuals and workers. However, Royal Mail Group may provide an update on progress where this is deemed appropriate.

Responsibilities **Chief Executive Committee (CEC)**

- Approval of the Speak Up (Whistleblowing) Policy
- Ensuring that resources are made available within Royal Mail Group as required

Internal Audit & Risk Management (IA&RM)

- The development and maintenance of the Speak Up (Whistleblowing) policy
- The development and maintenance of the framework and associated high level processes
- Coordinating the receipt of cases from Royal Mail Group's helpline provider and reporting back on progress and outcomes
- Reporting incidents and outcomes to the Audit and Risk Committee and to CEC
- Chairing a working group consisting of the subject matter experts, to ensure that serious claims are effectively investigated
- Contractual management of the third-party helpline provider

Group Functional Heads

- Facilitating a consistent approach to investigations that cover multiple business areas/group functions, and for developing any cross-unit plans that are required

Business Area/Group Function Heads

- Deploying the resources to ensure that the applicable business unit / group function develops and maintains its disclosure investigation capabilities so it

complies with this policy and associated procedures

Where to go for further information

Speak Up (Whistleblowing)

To report a concern:

- Telephone: and choose to either speak to an operator or leave a voicemail message
- Alternatively leave a message using the confidential on-line web based service using www.intouchfeedback.com/royalmail

If clarification is required as to whether a claim raised by an employee is relevant to the *Speak Up (Whistleblowing) Policy* email speakupenquiries@royalmail.com or contact Internal Audit and Risk.

Bullying & Harassment Helpline

A free helpline, operated by an independent company, to offer confidential advice relating to bullying or harassment concerns:

Telephone:

Security Helpdesk

To report any information about a crime relating to Royal Mail Group, or for advice regarding security:

- Telephone: or Postline
- Email: securityhelpdesk@royalmail.com

Just Say It

The Just Say It channel encourages all our people to ask questions, suggest ideas or make comments about the business:

- email: justsayit@royalmail.com

Forms

There are no forms relevant to this policy.

Related documents

There are no related documents to this policy.