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Whistleblowing – high level investigation process and lifecycle

All reports and allegations received via any of the Whistleblowing channels are always logged and investigated – whether they are reports from employees, Postmasters, Agent Assistance or members of the public and whether they are within the definitions and protections of Whistleblowing or not.

- Reports are received via the following channels:
  - Direct to the Whistleblowing Officer or the Whistleblowing Inbox GRO
  - Complaint to a team, e.g. customer complaints, BSC, Executive Correspondence team and Grapevine. These may be verbal or written communications.
  - Via confidential "Speak Up" line or on-line web portal. An automated email is sent to members of the Whistleblowing team when a new report has been submitted. The report can be viewed and downloaded via the speak up portal

- Acknowledgement that the report has been received sent via email, letter, speak up portal or telephone call - where contact details are provided

- All whistleblowing reports are logged within 24 hours (Monday to Friday) on 'The Whistleblowing log spreadsheet'. Once logged, a supporting folder is also created to save any relevant documents and communication exchanges

- Each report is reviewed to determine priority. If considered sensitive, serious, repeat (potential trend), this is referred to the Whistleblowing Officer for guidance on who should undertake the investigation. Before assigning for investigation the following is considered:
  - Should the report be investigated internally or externally (e.g. allegations of fraud by a Postman would be sent to Royal Mail Whistleblowing Officer to progress)
  - Nature of report?
  - Who is the report about? e.g. Direct employee, Agent or Agent Assistant
  - Is further information required?
  - Which business area is the report about?
  - Are there any steps that need to be taken to ensure impartial investigation. Is Legal advice required?
  - Any potential conflicts of interest with the person? i.e. Are they close friends with the individual or within line management
  - Consider if we need to contact the reporter (if possible) to gather further information (if anonymous via Speak Up portal, a request will be posted for the reporter to contact with further information and provide assurances about confidentiality)

- Where deemed appropriate, the case is assigned by email to the most appropriate person within the business. The email includes the following:
  - the action required
  - timescale for responses (progress update – within 2 weeks)
  - copy of the report (password protected)
  - copy of the Investigation Managers guide
  - instruction that the investigation must be undertaken confidentially

- Team diarise for response and send chaser to investigator if required (consider escalation if response not received)

- Monitor for further communication from reporter or similar reports (where we start to see a pattern of reports, we draw instances together, discuss with the Whistleblowing Officer, and agree next steps)

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- Review response from investigator and consider if actions and mitigation taken are appropriate (consider escalation if required). Where required, Whistleblowing Officer or Legal guidance is sought.

- Case is closed and feedback provided (where appropriate) to reporter via the reporting channel they have used or have given the Whistleblowing Officer permission to use (Speak Up line, e-mail or phone call). Where a report received is anonymous, whistleblowers will not ordinarily be able to receive feedback and details of any action taken

- If the case has been referred by an internal team, advise of closure

- If the reporter contacts again, the case and investigation will be reviewed, and if appropriate, discussed with the Whistleblowing Officer

- Report and case outcomes form part of monthly MI, and any trends/issues are highlighted. Material issues reported to RCC and ARC, if appropriate.