

Royal Mail Group Policy

Employee Confidential Disclosures

Royal Mail Group



Royal Mail Group Policies

Code	Policy Title
G07	Employee Confidential Disclosures

Brief Description:	RMG places great importance on the ethical conduct of its business and the protection of its good reputation. In accordance with best practice, RMG has adopted this Employee Confidential Disclosure Policy. This policy allows workers to raise reasonably held concerns relating to serious matters that could put RMG, its workers, or members of the wider public at risk. Worker confidential disclosures usually involve bringing forward concerns that are in the organisation's interest to investigate and resolve. Examples include fraud, the giving or taking of bribes, financial malpractice, misreporting, or practices that might endanger individuals or the environment.
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1. ROYAL MAIL GROUP (RMG) POLICY STATEMENT

RMG is committed to the highest standards of probity, transparency and accountability. The RMG Employee Confidential Disclosures Policy sets out the process by which workers (i.e. employees and others who are contracted to personally perform work on behalf of RMG) can raise concerns in confidence and, if required, anonymously about serious malpractice in the organisation in the knowledge that reports will be taken seriously and action taken where appropriate.

Workers, who appropriately raise legitimate concerns under the process in good faith, will not suffer any detriment as a result. RMG will endeavour to inform workers who raise such concerns 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.

2. BACKGROUND

Every organisation faces the risk that something will go seriously wrong. Whenever such a risk arises the first people to know something about it will usually be those who work in, or with, the organisation. It is vital therefore that workers are confident that they can raise their concerns without suffering any detriment. Workers should ideally raise concerns initially with line management, or where appropriate, with other dedicated helplines, such as the Security Helpdesk, the Bullying and Harassment Helpline, and the Corporate and Social Responsibility Helpline. The Speak Up hotline has been created in order to supplement existing helplines, to be used where the worker concerned does not feel confident in raising concerns via these existing routes. (See appendix A).

Worker rights in law where a concern is raised are covered by the Public Interest Disclosure Act (PIDA) 1998. PIDA enables workers to approach their employer or other relevant person in the event of a significant concern, and sets out the protection afforded to workers where a concern is appropriately raised. PIDA protects workers who make certain disclosures of information in good faith, and which in the reasonable belief of the worker are related to a dangerous or illegal activity that has occurred, or is likely to occur.

3. PURPOSE

RMG places great importance on the ethical conduct of its business and the protection of its good reputation.

In accordance with best practice, RMG has adopted this Employee Confidential Disclosure Policy. This policy allows workers to raise reasonably held concerns relating to serious matters that could put RMG, its workers, or members of the wider public at risk. Worker confidential disclosures usually involve bringing forward concerns that are in the organisation's interest to investigate and resolve. Examples include fraud, the giving or taking of bribes, financial malpractice, misreporting, or practices that might endanger individuals or the environment.

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4. SCOPE

This RMG policy applies to all business units within RMG including RMG Letters and Wholesale, Parcelforce Worldwide, Post Office Ltd and all group and support functions. For clarification, General Logistics Systems is not in the scope of this policy.

5. CONFIDENTIALITY AND THE PROTECTION OF WORKERS

Workers should ideally disclose any concern in the first instance to RMG in order to provide management with an opportunity to attempt resolution of the issue appropriately.

Confidentiality is not the same as anonymity. Workers who raise concerns through confidential disclosure 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 hotline 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 the commencement of investigations in certain cases.

RMG will always seek to protect workers who raise concerns under this policy from reprisal. Reprisals against workers who raise concerns in good faith are unacceptable and may give rise to disciplinary proceedings. In addition, workers are protected by legislation: PIDA provides workers who raise a concern with the right not to be subjected to any detriment through an act (or a failure to act) on the part of the employer, where a protected disclosure is made. PIDA identifies protected disclosures as those which, in the reasonable belief of the individual making the disclosure, tend to show one or more of the following, and are made in good faith to designated parties (including the employer):

- (a) That a criminal offence has been committed is being committed or is likely to be committed;
- (b) That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he /she is subject;
- (c) That a miscarriage of justice has occurred, is occurring or is likely to occur;
- (d) That the health or safety of any individual has been, is being or is likely to be endangered;
- (e) That the environment has been, is being or is likely to be damaged; or,
- (f) That information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

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

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

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6. RMG'S APPROACH TO EMPLOYEE CONFIDENTIAL DISCLOSURES

RMG prefers workers to raise concerns about serious malpractice with line management in the first instance. The business also has in place specialist helplines to offer advice and address certain types of concern (Appendix A). However, RMG recognises that sometimes escalation through these routes will not be possible (for example, if the worker considers that the line management may be involved in the issue, or the worker has a concern about confidentiality). In such instances RMG encourages workers to contact the "Speak Up" confidential hotline, which is run by InTouch MCS Ltd, a third party supplier.

Access to the hotline can be made by phone or via an on-line web service. InTouch will treat concerns in complete confidence and workers do 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 the worker is particularly concerned about the situation.

There is no requirement to provide contact details. However lack of such details may reduce the business' ability to undertake a full and robust investigation into worker concerns.

Details of the concern raised will be forwarded to RMG who will act on it in the most appropriate way. Any resultant investigations will be undertaken by people with appropriate authority who have the technical and professional knowledge relevant to the particular case.

It is possible that the business may wish to directly contact workers to request additional information. This will be undertaken only where workers have given express consent and are happy for a representative from RMG to speak directly to them. In all cases worker concerns will be treated sensitively and in confidence.

All calls to the Speak Up hotline will be acknowledged within 5 working days. RMG is not obliged to inform a worker who raises a disclosure the outcome of any investigation. In certain cases, to do so, could breach the rights of other individuals or workers. However, RMG may provide an update on progress where this is deemed appropriate. RMG will not provide such information in response to claims where the person making the call is not identifiable to RMG.

Worker concerns about serious malpractice may also be raised via other routes (e.g. through discussions with line managers or through raising concerns via alternative business helpdesks). Where concerns are raised by workers through these routes, but the concern would appear to be sufficiently serious to be covered by PIDA, the concern should be investigated and managed in line with this RMG policy. If clarification is required as to whether or not a claim raised by a worker is relevant to the Employee Confidential Disclosure Policy, please email "[speakupenquiries](#)" or contact Internal Audit & Risk Management.

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7. RESPONSIBILITIES

Key responsibilities under this policy are as follows:

Group Executive Committee (GET)

- Approval of the Employee Confidential Disclosures Policy;
- Ensuring that resources are made available within RMG as required.

Internal Audit & Risk Management (IA&RM)

- The development and maintenance of the Employee Confidential Disclosures policy;
- The development and maintenance of the framework and associated high level processes;
- Coordinating the receipt of cases from RMG's hotline provider and reporting back on progress and outcomes;
- Reporting incidents and outcomes to the Audit & Risk Committee and to GET;
- Chairing a working group consisting of the subject matter experts, to ensure that serious claims are effectively investigated.
- Contractual management of the 3rd party hotline provider.

Group Functional Heads

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

Business Unit / 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.

8. MAINTENANCE & CONTINUOUS IMPROVEMENT

IA&RM is responsible for ensuring that this policy is reviewed annually, and that learning and latest good practice are applied where appropriate.

Business Units and **Group Functions** are responsible for ensuring that local processes that support the investigation of worker confidential disclosures are maintained and updated to take account of changes to business structures.

Date of Next Review: August 2011

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Appendix A

CONTACT POINTS

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To report a concern.

Telephone **GRO** and choose to either speak to an operator, or leave a voicemail message. Your call will be treated in confidence.

Alternatively leave a message using the confidential on-line web based service using www.intouchfeedback.com/royalmail

Note: For queries relating to this policy or related processes contact Internal Audit & Risk Management (Email: speakupenquiries@royalmail.com) **GRO**

Bullying & Harassment Helpline

A free helpline, operated by an independent company, to offer confidential advice relating to bullying or harassment concerns, and to assist in initiating harassment complaints.

Telephone: **GRO**

Security Helpdesk

To report any information about a crime relating to RMG, or for advice regarding security.

Telephone: **GRO** or Postline **GRO**
Email: **GRO**

Corporate & Social Responsibility Helpdesk

To ask a question relating to health, social engagement, the environment, and safety issues.

Telephone: **GRO** or Postline **GRO**
Email: HRSC_CSR@royalmail.com **GRO**

Ask Adam

The Ask Adam channel encourages all our people to voice their opinions, share their ideas or seek clarification on any subject.

Email: **GRO**