



Post Office Whistleblowing Investigations Procedure

1. Introduction

This guidance explains the procedure to follow when a whistleblowing disclosure as defined by the Post Office Whistleblowing Policy is received. This document should be read together with the Post Office Whistleblowing Policy.

2. Who is covered by the Whistleblowing Policy?

The statutory protection under the Employment Rights Act 1996 applies to employees and workers which (for these purposes) include agency workers, homeworkers, casual workers and contractors.

3. Investigating procedure

When a whistleblowing disclosure is made, the Whistleblowing Officer will decide whether an investigation is appropriate and what form the investigation should take. He/she can decide to take no action if the complaint appears to be vexatious or is a matter which is more appropriate to be investigated under a different procedure. If the Whistleblowing Officer concludes that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

The action taken following a disclosure will depend on the nature of the concern and may be:

- resolved by agreed action as determined by the Whistleblowing Officer without the need for investigation
- investigated internally;
- referred to the police;
- referred to a regulatory authority.

If an investigation is appropriate, the Whistleblowing Officer will appoint an Investigation Manager to investigate the concern. The appointed Investigation Manager must be a manager at an appropriate level for the matter under investigation. They must not have any conflict of interest with the people or issues concerned. In some cases an investigator or team of investigators may be appointed including staff with relevant experience of investigations or specialist knowledge of the subject matter.



4. Responsibilities of the Investigation Manager

Following this appointment, the Investigation Manager should write to (if the whistleblower's identity is known) or otherwise contact the whistleblower acknowledging their disclosure and confirming that an investigation will be carried out.

If the whistleblower is prepared to meet, the Investigation Manager should arrange a meeting as soon as possible to discuss the concerns. The individual is entitled to bring a companion who must be a Post Office colleague or a Post Office recognised Trade Union representative. Any companion must respect the confidentiality of the disclosure and any subsequent investigation.

The Investigation Manager should obtain full details and clarifications of the complaint and keep a written record of the key points of concerns raised, especially if the worker has not put the matter in writing themselves.

The Investigation Manager should fully investigate the allegation with the assistance, where appropriate, of other individuals. The Investigation Manager should keep the Whistleblowing Officer updated during the investigation and liaise with the Whistleblowing Officer in the event of any concerns or questions.

5. Confidentiality and Anonymity

The Whistleblowing Officer and Investigating Manager should ensure that, whenever possible, those making disclosures are protected through a confidential investigation of their concerns.

If it is necessary for anyone involved in the investigation of the concern to know the whistleblower's identity this should be discussed with the whistleblower and explained. Proper investigation may be more difficult or impossible if Post Office cannot obtain further information from the individual. It is also more difficult to establish whether any allegations are credible. If whistleblowers are concerned about possible reprisals if their identity is revealed, they should come forward to the Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality.

6. The rights of the whistleblower

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If the Investigation Manager believes the whistleblower has



suffered any such treatment the Whistleblowing Officer should be informed immediately.

7. Conclusion of the investigation

The Investigation Manager must conclude the investigation by writing a report containing the findings of the investigation, including conclusions as to the validity of the allegations and recommendations for further action. The report should be submitted to the Whistleblowing Officer.

Post Office does not have to inform the whistleblower of the outcome of any investigation, nor provide them with any copies of any reports produced during the investigation, and in some cases Post Office may need to protect confidentiality or rights of other individuals. However, Post Office may provide an update on progress of the investigation where this is deemed appropriate.

8. Investigation records

The investigation paperwork including interview records, correspondence and final report should be sent to [xxxxxxx]

6. Advice and Support

For advice and support relating to this procedure please contact the Whistleblowing Officer.