

## Employee Disclosure Guidelines

**1.1** Each business should nominate a senior manager, and additional managers if its size and structure make this appropriate, to deal with cases of employee disclosure. Nominees should preferably be people with HR training and skilled in interview techniques. Arrangements should be publicised internally to all employees, giving contact details.

**1.2** On receipt of information about any unethical or unlawful practice, the nominated manager should approach the complainant discreetly and sympathetically and invite them to be interviewed confidentially. During the confidential interview, all relevant information should be gathered and an initial assessment should be made of whether the complaint is made in good faith or whether it appears to be malicious, mischievous or made out of a desire for personal vengeance. In cases of doubt, it must be assumed that the complaint is made in good faith. A confidential note of the interview may be made, but the informant should not be identified in it by name or by inference if they wish their anonymity to be respected at this stage. (But see section 1.4 below).

**1.3** When a disclosure case is received for investigation, the case must be reported to the Head of Internal Audit on GRO in order for the case to be logged.

**1.4** The nominated manager should then pursue the complaint with the director of the department concerned (provided he or she is not implicated in the complaint) and conduct an enquiry to confirm the facts. If it is apparent that financial irregularity is involved, Royal Mail Internal Audit and Risk Management must be involved immediately. If there is a suspicion of criminal activity, Royal Mail Corporate Security must be involved immediately. Royal Mail Internal Audit and Risk Management and/or Royal Mail Corporate Security will pursue their investigations independently of management, but may require the production of, and retain, any documentation relating to the complaint or initial management enquiry. They may also require the disclosure of the identity of the employee who has provided information.

**1.5** Once an enquiry has been completed, the nominated manager should (after appropriate consultation with other senior managers) recommend to the line manager whether there is a case to be pursued under the business conduct code. If it is decided that there is not, the complainant should be told, and given reasons. If the complaint is found to be wholly or partly substantiated, appropriate action should be taken according to the business conduct code. In this case (and particularly if criminal prosecution is involved), the complainant should be advised only that their concern is being dealt with and that they will be notified of the outcome. They should be given a further report, in writing if requested, once resulting action has been concluded, and asked to confirm that their complaint has been dealt with satisfactorily. The need for any further action should then be reviewed by management.

**1.6** Once a disclosure enquiry has been completed, the outcome must be reported to the Head of Internal Audit (contact numbers in 1.3) to close the case.

**1.7** Employees who have disclosed information about any misconduct or malpractice must be given every reasonable protection against any form of recrimination or intimidation. This will be particularly necessary where the complaint involves previous instances of harassment or bullying. The complainant's identity must be protected so far as possible, and not disclosed to the person who is the subject of the complaint. If it becomes absolutely necessary to disclose it in order to substantiate the complaint, the subject of the complaint should be warned that any attempt at recrimination will be a serious disciplinary matter, and firm action must follow if the warning is ignored. If separation of the employees in question is appropriate, then on principle (as in sexual harassment cases) it is the perpetrator, not the victim, who should be moved. If, however, the victim asks to be moved for their own protection or peace of mind, prompt and supportive action must be taken to help them. If appropriate, the complainant should be supported by counseling both during and after the outcome of the investigation.

**1.8** Where information is provided anonymously, the allegation should be investigated as in 1.4 above and appropriate action should be pursued. There need be no attempt to establish the identity of the complainant unless their testimony is essential to substantiating a serious complaint.

**1.9** Any complaint upheld against a Royal Mail Group director must be notified in confidence to The Secretary to Royal Mail Group. If financial activity and/or criminal activity are involved, Royal Mail Internal Audit and Risk Management and Royal Mail Corporate Security must also be notified.

**1.10** Throughout the enquiry process, the rights of the person or persons complained of must be adequately respected while the facts are being established. It may be that the perpetrator, or alleged perpetrator, requires counseling or other support and this should be provided as appropriate. Managers making enquiries must take care to establish facts and to take an evenhanded approach. This will be particularly challenging when allegations and denials of harassment or bullying may largely depend on the differing perceptions of the parties involved.

**1.11** Nothing in this guideline should be taken to affect an employee's right to involve their trade union in accordance with agreed practice should they choose to do so.

### Further Information

In such a sensitive area, no rule can cover every eventuality. It is essential that good behaviour and integrity are fostered and supported throughout the organisation, and recourse to the employee disclosure system should be necessary only as a last resort. Its effectiveness will depend on the discretion, good judgement and impartiality of the nominated managers responsible for operating it and of managers who are called on to take remedial action.

**The channels for making a protected disclosure are listed below:**

<b>Concerned about</b>	<b>Contact</b>	<b>Number</b>
A colleague or a contractor	Your manager Your manager's manager. <i>Any contact listed below where appropriate.</i>	<b>GRO</b>
Your manager or contract manager	Your manager's manager. <i>Any contact listed below where appropriate.</i>	
Financial irregularities, fraud	Head of Internal Audit	
Unsafe work practices, Health & Safety policy	CSR Helpdesk	
Crime or suspicion of a crime	Royal Mail Corporate Security Helpdesk Crime Stoppers Post Office Ltd Security	
Bullying and harassment	Bullying and Harassment Helpline	
A Royal Mail Group Director	Company Secretary	
A concern about any employee or contractor where you are not comfortable with any of the above alternatives, or if you believe that	Head of Internal Audit	

appropriate action hasn't been taken from an earlier report		
Any employee disclosure matter	Your local CWU or CMA union representative	<b>GRO</b>
Wrongdoing at work – free of charge confidential advice can be obtained from the whistleblowing charity, Public Concern at Work	Public Concern at Work	

For advice concerning the Public Interest Disclosure Act 1998 please contact People Contact Services on **GRO** or **GRO** Post Office Ltd employees should contact **GRO**  
**GRO**

Once a disclosure is received via the above channels, it should be re-directed to a nominated senior manager for further investigation. Nominated contacts for each Business Unit can be found in the contacts table.