

Whistleblowing Briefing Paper

Definition & Legalities

- A whistleblower is defined as a person who raises a concern about a wrongdoing within an organisation. The revealed misconduct may take a number of forms, including violation of a law, direct threat to public interest, fraud, health & safety, or corruption.
- The allegations may be made internally (to people within the business), or externally (regulators, law enforcement agencies, media).
- Whistleblowers frequently face reprisals, sometimes at the hands of colleagues, the organisation, or under law depending on the nature or validity of the concerns raised.
- Employees and staff who make a genuine 'protected disclosure' are protected from being treated badly or being dismissed under the 'Public Interest Disclosure Act (PIDA) 1998.
- A clear procedure for raising issues or concerns will help to reduce the risk of such concerns being mishandled, whether by employees or the organisation.
- The existence of such a policy, together with evidence that an employer was concerned to deal effectively with any malpractise, will make it less likely that any tribunal will find an employee was behaving reasonably by making disclosures to an outside body or person.

Creating a Whistleblowing Policy within Post Office Ltd (POL)

- The above points give good reason why it is important and sensible to develop a bespoke employee confidentiality disclosure policy unique to POL, especially with the impending separation from Royal Mail Group.
- The provision of a whistleblower facility would be available to all employees within POL, including Agents staff within the Network.

- Such a policy and confidential helpline would supplement existing specialist services within the overall business, including, Security Helpdesk, Bullying & Harassment Helpline, NBSC and HR Helpline.
- By creating a whistleblower facility, it may also mitigate against illegal or inappropriate activities by employees, in as much as such a facility may have a deterrent value to staff who may have been contemplating inappropriate actions.
- In recent months much groundwork has been done to pave the way for the implementation of such a policy. Activities undertaken have included liaison and benchmarking within RMG, as well as with external companies.
- Further stakeholder engagement will be necessary in the future and prior to any official launch. Engagement should be sought with appropriate personnel from Network, Supply Chain, Admin functions, NFSP and unions.
- It is intended to utilise the Post Office Grapevine service to manage and operate this facility. The facility will incorporate a confidential helpline number which can either generate an operator response, or on which a message can be left. There will also be a dedicated e mail address to facilitate the provision of information by secure electronic means.
- Grapevine is owned and funded by POL, and has been operational since January 2007. A number of bespoke security orientated services are provided to POL by Grapevine.
- All information and data held be Grapevine in relation to this service will be held securely, and remain the sole property of POL.

Future progress towards implementation & potential obstacles

- Although the intended use of 3rd party staff to manage this operation should be of benefit in creating an atmosphere of impartiality and reassurance in the mind of the whistleblower, it will also highlight some concerns which will need to be managed.

- Not least of these concerns will be ensuring that all staff assigned to this task receive the necessary level of training to enable them to deal professionally with incoming calls.
- Line operator training will to some degree determine the level and type of information the caller is willing to divulge. If a professional environment is engendered, the caller may feel more comfortable in divulging more comprehensive information.
- Further escalation of initial calls will need to be managed carefully. The use of a 3rd party operated helpline may suggest a mistrust of individuals, or the company, by the whistleblower in the first instance.
- If calls are escalated back into the business as part of a pre-defined policy, there must be absolute transparency and impartiality from all those involved for the reasons outlined in the point above.
- Calls received on the helpline that are found to be of a malicious nature must be investigated thoroughly with a view to the disciplinary process being invoked if appropriate.
- Prior to any launch, engagement should be sought with the Internal Communications Team. They should be able to guide and assist in terms of poster/literature content and design, as well as identifying the appropriate vehicles to ensure the launch is communicated in a timely and comprehensive manner.