

## Message

**From:** Sally Smith [GRO]  
**on behalf of** Sally Smith [GRO]  
**Sent:** 20/03/2017 11:32:44  
**To:** Georgina Blair [GRO]  
**CC:** Paul Blackmore [GRO]; Thomas Richmond [GRO]  
Richard Williams [GRO]; Sharon Rai [GRO]; John Flood [GRO]  
**Subject:** RE: Whistle Blowing and Grapevine

Hi Georgina,

Jane seemed to think that we may have transferred the Speak Up Line to King's, but John advised last week that this was not the case, but it had been looked at previously.

When we moved to the King's Grapevine service (back in October/November 2012), it was launched as a whistle blowing service for agents and their staff, and so it is just a case of re-invigorating this, which John can achieve easily. We already get monthly MI categorised by call types, so it will be very simple to include the data that Jane has requested.

John – let me know if you can implement from the below, or if you need a meeting? We need to get this sorted asap so that when Sharon sends the comms out, if it does prompt any agency calls to Grapevine, then they know to take the details, 'ring-fence' and e-mail the details to the whistleblowing e-mail account.

Thanks,  
Sally



**Sally Smith**  
Head of Financial Crime

Finsbury Dials, 20 Finsbury Street, London EC2Y 9AQ

[GRO] Mobex [GRO]  
[GRO]

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**From:** Georgina Blair  
**Sent:** 16 March 2017 18:09  
**To:** Sally Smith [GRO]; John Flood [GRO]  
**Cc:** Paul Blackmore [GRO]; Thomas Richmond [GRO]  
Richard Williams [GRO]; Sharon Rai [GRO]  
**Subject:** RE: Whistle Blowing and Grapevine

Hi Sally,

Just to clarify:

The Speak Up line (for employees only) is run by a third party under contract (In Touch Ltd).

Jane wants to encourage agents to report concerns, which is also an FCA requirement, and we want to use Grapevine as their reporting line.

John is setting up a meeting for us to discuss the possibilities - would be good for you to attend if Jane wants you to do something with whistleblowing going forward.

Thanks

Georgina

Georgina Blair  
Risk Business Partner

**GRO**

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**From:** [Sally Smith](#)

**Sent:** 16/03/2017 17:44

**To:** [John Flood](#)

**Cc:** [Paul Blackmore](#); [Thomas Richmond](#); [Richard Williams](#); [Georgina Blair](#); [Sharon Rai](#)

**Subject:** Whistle Blowing and Grapevine

Hi John,

As discussed briefly yesterday, I have had a conversation with Jane and we need to do some work around Whistle Blowing, as we have identified discrepancies between HR Intranet site and policy following a report that came in via a paper SAR the other week. We are going to incorporate a review of the policy with the ABC, Financial Crime and AML/CTF work that Tom is currently working through (and that hopefully when Paul gets back can assist with), as Whistleblowing is cross referenced in all these policies.

Part of our policy review will be to do a thorough gap analysis against actual operational processes to ensure these reflect policy, and we will be documenting the processes for Whistleblowing.

Sharon is arranging for some comms to go out which reinforces that agents and agent employees (who are not strictly covered in the same way as direct employees), should report suspicions to Grapevine. We need to ensure that any potential whistleblowing calls that Grapevine receive are flagged as such, not shared with anyone else, and e-mailed each day to the whistleblowing inbox. This is accessed by Jane on a daily basis, she will then log and deal or pass to myself or the appropriate stakeholder if the matter is not strictly Whistleblowing.

We need to ensure that Grapevine introduce this asap, and I would like them to add the Whistleblowing category onto their monthly incident report – obviously just showing the volume or 'nil' not any of the details.

Can you confirm when this has been set up?

Also, Jane understood that the Speak Up Line may now be run by Grapevine, but you said yesterday that this is not the case – can you confirm? Can you also let me know what the costing impacts were when you looked at this proposal?

Many thanks, and please shout if you have any queries.

Richard/Georgina – FYI only.

Sally



**Sally Smith**  
Head of Financial Crime

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**GRO**

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