POST OFFICE LIMITED
RISK & COMPLIANCE COMMITTEE

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8.3) Whistleblowing

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Executive Summary

Context

Post Office has a Whistleblowing Policy (adopted in May 2016) which requires an annual report to the Risk & Compliance Committee and the ARC on any whistleblowing reports which have been made in the year. The last report was made to the RCC in May 2016 covering the period to March 2016.

Questions this paper addresses

- What whistleblowing reports have been made this year?
- What actions have been taken to investigate these reports?
- What issues do these reports raise?

Conclusion

- Whistleblowing concerns can be raised in a number of ways: to line managers, other senior managers, through the Speak Up line, to the General Counsel via the email address whistleblowing GRO or in certain cases through external reporting lines such as to a regulator.
- 2. Postmasters can also raise concerns through the Grapevine reporting line and website, although concerns raised this way are investigated by the Security team.
- 3. In the period from end March 2016 to date only 2 whistleblowing reports have been received. This seems low compared to the number of reports received in previous years (3 in 2014-15, and 7 in 2015-16).
- 4. The reports in the current year related to the following:
 - A report was made to the FCA by an individual who was concerned that it appeared to be custom for staff at a specific branch to be able to initiate transactions under a single log-in. The FCA referred the concern to Bank of Ireland. Bank of Ireland requested Post Office's assistance to respond to the complaint. POL provided a response to BoI as to the required Horizon protocols and there has been no follow up from the FCA or BoI.
 - An anonymous report was made to the Speak Up line expressing concern as to the software procurement practices at Post Office. The CIO and Head of Procurement have been asked to review the software procurement processes and confirm that they are satisfied that the processes are appropriate so as to ensure that requirements are properly scoped and

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relevant procurement processes followed. The advice received was that while anomalies will always occur, and the processes are cumbersome, they believe that overall the processes are sufficiently robust.

5. The whistleblowing policy is referenced in many of the other Post Office policies and the Code of Conduct. Since the beginning of the calendar year we have issued communications across the business reminding colleagues of the whistleblowing policy and advising how concerns can be reported. Interestingly the report raised in relation to software procurement followed one such communication.

Input Sought

The Committee is asked to note the report.

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