

## Draft Whistleblower Policy

### Introduction

Post Office Ltd (POL), attaches great importance to the ethical conduct of its business and to the protection of its good reputation. This policy sets out POL' s requirements for enabling employees to disclose information ( "Whistleblowing" ) about breaches of its policies and standards of conduct.

The implementation of such a policy becomes even more pressing with the impending separation of the business from the wider Royal Mail Group. A stand alone policy is therefore desirable to comply with all aspects of the Public Interest Disclosure Act (PIDA) 1998, which ensures staff, or employees, who make a genuine 'protected disclosure' are protected from mistreatment or dismissal as a result of their acting in good faith.

### Definition

A whistleblower is defined as a person who raises a concern about a wrongdoing within an organisation (usually one in which they work). 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).

### The Policy

Post Office Ltd is committed to trust and openness in its dealings with all employees, and to listening to their views. It has adopted a Code of Business Standards, and is determined to see that the standards in it are effectively observed. It seeks to foster a working environment where line managers are accessible to their staff and can be expected to give a fair hearing to any legitimate concern which is raised with them, and to respond positively. In some cases however, an employee may find it difficult to approach their line manager with sensitive information for a number of reasons, the availability of a whistleblower medium to capture such information should prove

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extremely beneficial to the business.

This policy will ensure that staff have a robust, yet discreet process to follow to divulge actions, or information, relating to others within the business that may prove of detriment to the business.

This will be achieved by the initiation of a dedicated Whistleblower Helpline and e mail address for such reporting means. The Helpline will be operated by 3<sup>rd</sup> party staff employed to pursue the various requirements emanating from the POL Grapevine service. Grapevine is owned and funded by POL, and has been operational since January 2007. A number of bespoke security services are carried out by Grapevine, the whistleblower process will be an addition to this portfolio.

The existence of a safe channel for employee disclosure is important to ensuring the ethical health of the organisation, it needs to be sensitively managed. It should support morale and promote employee confidence and loyalty in the organisation. Genuine complainants must be encouraged and protected, but malicious complainants are to be discouraged, and in this respect the discipline process may be invoked to deal with individuals found to be making such calls.

### Training

- Grapevine personnel tasked with the operation of the whistleblower line will need to be trained to a level to ensure that callers feel comfortable with the professionalism and sensitivity displayed in order to divulge as much information as possible, including their own details ideally.
- Likewise, appointed whistleblower colleagues within POL may need further training to enhance their capabilities to deal with the variety of information types received via this source.

### Call Management Process

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- Callers should be encouraged to submit their details in order that a thorough investigation of the information received can take place, with further discreet contact with the source being available if needed.
- Genuine calls escalated back into POL by Grapevine for further investigation should be to the designated whistleblower colleague whose area of expertise the contents of the call falls under.
- All information and data held by Grapevine in relation to this service will be held securely, and remain the sole property of POL. All calls will be recorded for accuracy and verification purposes. Reports and other management information streams may be required from Grapevine as detailed in any service level agreements in place.

## Further Support For Callers

- Employees who raise legitimate concerns under these guidelines in good faith must not suffer disciplinary action or discriminatory treatment as a result, even if a subsequent enquiry concludes that the complaint cannot be substantiated in whole or in part.
- All information sources should be treated with the upmost discretion to ensure that personal details are not divulged to anyone acting outside the limitations and guidelines of this policy.

## Review

An annual review should be undertaken following deployment of this policy. This can be undertaken on a more frequent ad hoc basis if this is deemed necessary in conjunction with information from stakeholders, and/or the service provider.