



Post Office
Whistleblowing Policy

The purpose of this Policy is to set out the process by which Post Office employees and others who are contracted to personally perform work on behalf of Post Office, can raise concerns in confidence and, if required, anonymously about serious malpractice in the organisation.

Version History

Version Number	Date	Editor	Status
0.1	17/02/2014	Georgina Blair	Draft

Version History

Date	Version	Updated by	Change summary

Document Location

The latest version of this document can be found in the Post Office SharePoint Policy Library

For Sign-off - This document has been approved by the following people:

Name	Title - Department	Date of Sign off
David Mason	Head of Risk Governance	
Chris Aujard	General Counsel	

For Information - This document will be distributed to the following people:

Name	Title - Department

This policy will be reviewed annually. Next review date March 2015.

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1. Purpose

The Whistleblowing Policy sets out the process by which Post Office employees and others who are contracted to personally perform work on behalf of Post Office, can raise concerns in confidence and, if required, anonymously about serious malpractice in the organisation in the knowledge that concerns will be acknowledged and action taken where appropriate. This policy is intended to ensure that the treatment of workers who raise concerns within Post Office does not breach their rights as expressed in the Public Interest Disclosure Act (PIDA).

2. Scope and definitions

This policy applies to Post Office employees and others who are contracted to personally perform work on behalf of Post Office. This policy does not apply to agents, operators and their assistants.

The term 'worker' is used throughout the policy to refer to Post Office employees and those who are contracted to personally perform work on behalf of Post Office.

The term 'whistleblowing' refers to the disclosure by a worker of serious concerns about malpractice that has taken place or is taking place within the organisation, to a line manager, independent manager or external body.

The Public Interest Disclosure Act (PIDA) is legislation which provides workers who raise a concern with the right not to suffer any detriment or dismissal by the employer if they make a protected disclosure. PIDA identifies protected disclosures as those which are made in good faith and are reasonably thought to show one or more of the following:

- That a criminal offence has been committed, is being committed or is likely to be committed
- That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he /she is subject
- That a miscarriage of justice has occurred, is occurring or is likely to occur
- That the health or safety of any individual has been, is being or is likely to be at risk
- That the environment has been, is being or is likely to be damaged; or
- That information about any of the above matters is being or is likely to be deliberately concealed

A disclosure will not qualify as protected if the person making the disclosure commits an offence by making it.

3. Governing principles

Post Office is committed to conducting business with the highest standards of honesty, integrity and openness in order to create a workplace where workers feel able to raise concerns internally.

Any worker who raises a legitimate concern in good faith under this process will not in any way be liable to disciplinary action or loss of benefits, rights or prospects as a result of their action.

Disciplinary action may be taken against any worker who is shown to have used whistleblowing procedures to make malicious or misleading allegations that they know to be false.

4. Types of concerns

Workers should raise a concern if they are aware of, or suspect, wrongdoing which affects others (eg. customers, members of the public, colleagues or the Post Office).

Some examples of situations where a worker may raise a concern are:

- Fraud
- Giving or taking of bribes
- Financial malpractice
- Misreporting
- Practices that might put individuals or the environment at risk

5. Ways to report concerns

In the first instance workers should raise concerns with their line manager, or a senior HR manager in the Post Office. They will either act on the information given to them, or pass it to the relevant person who can deal with it.

It is recognised that sometimes raising a concern directly with the business will not be possible, for example, if the worker considers that the line management may be involved in the issue or if they have a concern about confidentiality.

In such instances workers should contact the "Speak Up" confidential reporting service which is run by InTouch MCS Ltd, an independent company. InTouch will treat concerns in complete confidence and the worker does not have to provide contact details.

The Speak Up service is available on GRO or via a secure on-line web portal at <http://www.intouchfeedback.com/postoffice>.

The worker will be requested to provide information about their concern, for example the history of the concern, relevant individuals and the reason why they are particularly concerned about the situation.

There is no requirement to provide contact details. However, not providing details may reduce the business' ability to make a thorough investigation into the concerns raised. All reports to the Speak Up line will be acknowledged within five working days.

6. Investigation of reported concerns

Details of concerns raised via the Speak Up service will be forwarded to the Post Office who will act on each concern in the most appropriate way. Any resulting investigations will be made by people with appropriate authority who have the technical and professional knowledge needed for the particular case.

In some cases it is possible that the business may wish to directly contact the worker to request additional information. This will be done only where the worker has given express consent and are happy for a representative from the Post Office to speak directly to them. In all cases the individual's concern will be treated sensitively and in confidence.

Where concerns about serious malpractice are raised through other routes, such as via line managers, other senior managers or by other business helpdesks, and the concern would appear to be sufficiently serious as to be covered by the Public Interest Disclosure Act, this should be investigated and managed in line with this policy.

The Post Office does not have to inform a worker who raises a concern the outcome of any investigation and in some cases the Post Office may need to protect confidentiality or rights of other individuals and workers. However, the Post Office may provide an update on progress where this is deemed appropriate.

7. Roles and responsibilities

The Risk and Compliance team supplies an annual summary of reports made via the Speak Up line and other known instances of whistleblowing to the Risk and Compliance Committee and to the Post Office Board.

Any serious concerns reported by whistleblowing will be escalated by the Head of Risk Governance to the Chairman of the Audit and Risk Committee.

7. Risk

8. Contact

For further information about this policy contact the Risk and Compliance team on GRO