

# Speak Up

## Two Year Strategy

Version 1.0



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# 1 Purpose

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## 1.1 Purpose of the Strategy

The Speak Up Strategy sets out Post Office Limited's (POL) two-year vision for the Speak Up function. The purpose of this Strategy is to deliver increased awareness, listening up and use of the Speak up function as part of POL's determination to restore trust in POL amongst our staff and post office network.

It should be read in conjunction with POL's Speak Up Policy, Code of Conduct and Dignity at Work Policy, which provide guidance to employees and the wider network on the behaviours expected to ensure everyone is treated with respect at work.

## 1.2 Understanding Speak Up (Whistleblowing)

Speak Up' (Whistleblowing) is the reporting of issues of concern, wrongdoings, illegal activities, or unethical behaviour made in good faith and in the interest of the public or POL.

We have followed external best practice in changing the terminology from 'whistleblowing' to 'speak up' as its connotations are generally more positive, thus encouraging employees and Postmasters to voice their concerns and speak up without fear of retaliation.

The Public Interest Disclosure Act (PIDA) 1998 makes it unlawful for an employer to dismiss or victimise a worker for having made a 'protected disclosure.' A protected disclosure is one that is given in good faith, is in the public interest and addresses one of more of a number of listed 'wrongdoings.' These fall under six categories:

- criminal offences;
- failure to comply with legal obligation;
- miscarriages of justice;
- dangers to health or safety;
- dangers to the environment;
- or deliberate concealment of any of the above categories.

The Speak Up team provides monthly analysis of trends and common drivers from received reporting to the Speak Up Champion and senior POL staff. This provides insights and helps increase an understanding of the type of Reporters and risks. The business can then act on these identified risks. Where an investigation results from Speak Up reporting, any findings are passed to Group Assurance for resolution.

## 1.3 POL Commitments to Speak Up

Changing from 'Whistleblowing' to 'Speak up' as the function name and the promotion of 'speaking up', which generally has more positive connotations, is to encourage employees and POL to voice their concerns without fear of retaliation.

Trust is a pillar of the Speak Up function. Without it, employees who want to speak up may hold back due to concerns about possible consequences. To address these concerns, leaders need to have 'buy in'.

There is the negativity and belief that no action will be taken once the Reporter speaks up. Therefore, it is important to keep the Reporter in the loop at each stage of the reporting process to reassure them that their claims are being taken seriously. It is not enough to set up a telephone line and hope for the best. To reap the benefits of transparency and trust, POL need to ensure that the speak up procedures are effective.

It is therefore imperative that the Speak Up Team and POL raise awareness of the Speak Up function on a continual basis, beyond merely posting guidance on the POL intranet.

It is not the sole responsibility of the Speak Up Team to foster a 'Speak Up' Culture. Everyone has their role in promoting 'doing the right thing'.

- We will work to remove any stigma and real or perceived barriers to Speaking Up to foster a culture that gives Reporters confidence that they will be listened to, treated fairly and with respect.
- We will work to remove barriers and regain trust, by engaging with the business and providing awareness and being receptive to feedback.

## 1.4 What does the Strategy aim to achieve?

An effective 'Speak Up' function is key to cultivating a safe, supportive culture within POL and to identify and manage risk within the business. Everyone in POL and the post office network should be able to engage safely and meaningfully by having their voices heard. Speaking out against wrongdoing, poor practice, discrimination, and intolerance can lead to real actions and create a culture of openness and transparency where employees, Postmasters and the wider business network feel confident to speak up.

Since the dedicated Speak Up function was formed in 2021 there have been 281 reports. Analysis of the reports shows an increase in serious issues being raised. Fraud and theft remain the highest categories, but code of conduct, compliance and regulation violation cases are the areas showing a greater increase in reporting. We have also seen an increase in reporting from POL staff (31%) and Postmasters and their staff (29%). We wish to build upon this. These groups, POL staff and Postmasters will be central to this two-year strategy.

To deliver this strategy and help bring about change in culture, this strategy will concentrate efforts in following focus areas depicted in the next page.

## 2 Focus Areas

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### 2.1 Awareness



Increased awareness of the Speak Up function is necessary among both postmasters and colleagues so that everyone knows how to raise concerns confidentially or anonymously and to whom concerns can be raised.

## 2.2 Confidence in Speaking Up

Encouraging employees and Postmasters to voice their concerns without fear of retaliation is essential so that concerns are heard and are promptly and thoroughly investigated, with feedback provided and outcomes shared wherever possible.

## 2.3 Training and Support

If POL teams and Postmasters, particularly those in management and leadership roles, have a range of training and support around the Speak Up process it is more likely that issues will be raised and effectively resolved. It is important to improve the knowledge and visible support for Speak Up at the top of the organisation relating to the value and processes of Speak Up.

To deliver the strategy, the following key objectives and actions have been identified based on the premise of using multiple communications channels. These key objectives are outlined in the next page.

## 3 Delivering the Strategy

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### 3.1 Improve awareness of the Speak Up Function

- All new starters are made aware of the Speak Up function. The rhythm of this awareness activity will be increased throughout year, stages of employment, and the audience broadened.
- An ongoing communications plan to ensure all employees and the wider network are made aware of the Speak Up function through engagement with POL's colleague networks and with Postmaster groups such as the NFSP and focus groups.
- There is clear, living, and accessible information about how to speak up and raise concerns on internal POL hub and Branch Hub pages (available to employees and postmasters respectively).
- A programme of engagements takes place with the Speak Up Champion and GE members across the key stakeholder groups to provide regular communication and to maintain visibility and facilitate engagement.

### 3.2 Improve confidence in Speaking Up

- Provide increased visibility to the good work being carried out by publishing each quarter on the Speak Up intranet page informative statistics and thematic insights. Where possible, Reporters would provide publishable feedback (attributable and unattributable) as to their experience for inclusion on the intranet site.
- Ensure that any cases are handled according to published timescales and that concerns are dealt with promptly and confidentially.
- Wherever possible, case studies will be developed and communicated to share the outcome from investigations, or examples will be given where case studies may not be possible.
- The Speak Up team will consult colleague networks and Postmaster groups as part of the annual review of Speak Up policy and strategy to ensure they are fit for purpose.
- All those who raised concerns receive feedback on the outcome of the investigation and have their opportunity to provide feedback on the process.

### 3.3 Training and Support

- Annual training and provision of support on good Speak Up leadership behaviours for all leaders and managers, including training on the importance of listening to and positively responding to concerns, will be undertaken by SLG and managers.
- Training and support will be provided to key areas of the business to recognise Speak Up reports and what to do when one is made, e.g., Executive Assistants, Area Managers and Branch Assurance team.
- The training is not solely web-based and will provide an opportunity for employees and POL's network to ask questions.
- Activities in these areas will be led by the Speak Up Team, with support from the People Team, SLG, Board and Non-Executive Director Speak Up Champion.

## 4 Communication Plan

### 4.1 Communication Plan

Communicating and engaging with our different stakeholder groups is key to each of the focus areas. Each focus area will have its own communications plan. A high-level outline of audiences and activities has been created which will then be adapted into a communications timeline in collaboration with communications colleagues and key stakeholders.

We will measure how effectively the strategy is being implemented using the approaches annotated in the next page.



## 5 Measure of Effectiveness

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### 5.1 Improved Awareness

Using opinion poll surveys, understand what employees know about Speaking Up at POL and identify improvements. We will provide MI reports and high-level findings to RCC and SEG for oversight on trends and themes and then publish the findings on the intranet page.

### 5.2 Better Relationships

We will ask POL employees, Stakeholders and Reporters for feedback on our relationship via focus or contact groups and whether they feel it is improving through our engagement and training.

### 5.3 External Assurance

The Speak Up team become members of Protect to conduct an assessment following their benchmark assessment conducted in 2021. Membership of Protect would also enable the Speak Up team to attend Protects' masterclasses and training events to remain current with continuous learning in their respective roles.

### 5.4 Continuous Improvement

We will ask Reporters for feedback. Assurance and Complex Investigations (AC&I) will review a sample of the Speak Up team's investigations on a two-monthly basis, making recommendations as to improvements and knowledge or training gaps. Group Assurance will review Speak Up's work annually. The Speak Up team will establish a network of contacts in the Whistleblowing management industry to access best practice and learn from the wider experience of their peers.

## 6 Reviewing the Strategy

### 6.1 Reviewing the Strategy

- Implementation of the strategy will be overseen by the Head of A&CI. An evaluation of progress will be made in April 2024 with revised/new priorities identified for 2024 – 2025 and a report of progress published.
- A new two-year strategy will be devised for April 2025-2027.



