



Post Office
Whistleblowing Policy

Version History

Version Number	Date	Editor	Status
0.1	17/02/2014	Georgina Blair	Draft
0.2	28/04/2015	Georgina Blair	Updated for comments from Nisha Marwaha (Legal)
0.3	30/04/2015	Georgina Blair	Updated after further discussion with Nisha Marwaha
0.4	01/05/2014	Georgina Blair	Updated for amends from Nisha

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
Jane MacLeod	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 May 2016.

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1. Purpose

The Whistleblowing Policy sets out the process by which Post Office employees, officers, consultants, contractors, casual workers and agency workers ("Workers") can raise concerns in confidence and, if required, anonymously about suspected wrongdoing in the organisation in the knowledge that concerns will be acknowledged and action taken where appropriate. Wrongdoing includes criminal activity, civil offences (including negligence, breach of contract, breach of administrative law), miscarriages of justice, dangers to health and safety or the environment and the cover up of any of these.

This policy is intended to

- (a) encourage Workers to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- (b) provide Workers with guidance as to how to raise those concerns; and
- (c) reassure Workers that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure or the Stop Bullying and Harassment Policy as appropriate. If you are uncertain of whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer, whose contact details are in section 2.

2. Scope and details of Whistleblowing Officer

The term 'Worker' is used throughout this policy to refer to Post Office employees, officers, consultants, contractors, casual workers and agency workers. This policy applies to Workers; it does not apply to Subpostmasters (i.e. agents, operators) and their assistants.

The term 'whistleblowing' refers to the disclosure by a Worker of serious concerns about any wrongdoing that has taken place or is taking place within the organisation, to a line manager, manager Whistleblowing Officer or in some circumstances, an 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 be dismissed by their employer if they make a 'protected disclosure'. The following are 'protected disclosures':

- 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.

The Whistleblowing Officer is Post Office's General Counsel, currently Jane MacLeod (or).

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 suffer any detriment 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, offering or taking of bribes
- Financial fraud or mismanagement
- Misreporting
- Practices that could put individuals or the environment at risk
- Breach of our internal policies and procedures (including the Code of Business Standards)
- Any conduct likely to damage Post Office's reputation

5. Ways to report concerns

- (a) In the first instance, Workers should raise concerns with their line manager, or a senior HR manager in the Post Office.
- (b) Alternatively Workers can notify the Whistleblowing Officer directly, using the contact details given in section 2.
- (c) 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 [\[GRO \]](#) [HYPERLINK].

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. We hope that Workers will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you. All reports to the Speak Up line will be acknowledged within five working days and will be passed to the Whistleblowing Officer.

6. Investigation of reported concerns

All concerns will be passed to the Whistleblowing Officer who will carry out an initial assessment to determine the scope of any investigation. In some cases the Whistleblowing Officer may appoint an investigator or team of investigators, including staff with relevant experience of investigations or specialist knowledge of the subject matter.

In some cases it is possible that Post Office may wish to directly contact the Worker to request additional information. This can be done anonymously through the Speak Up service via secure voicemail or secure messaging on the web portal. Where the Worker's identity is known, this will be done only where the Worker has consented and is happy for a representative from Post Office to speak directly to them. In all cases the individual's concern will be treated sensitively and in confidence.

Subject to concerns about confidentiality, the Worker may be required to attend additional meetings in order to provide further information. Workers can bring a colleague or union representative to any meetings under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

7. Outcomes

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

8. External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media.

We strongly encourage you to seek advice before reporting a concern to external parties. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are as follows:

Helpline:

E-mail:

Website: www.pcaw.co.uk

9. 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 Audit and Risk Committee. The confidentiality of whistleblowers will be respected.

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

10. Protection and Support for Whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support Workers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied you should raise it formally using Post Office's Grievance Procedure.

Workers must not threaten or retaliate against whistleblowers in any way. If anyone is involved in such conduct they may be subject to disciplinary action.

11. Contact

For further information about this policy contact the Whistleblowing Officer, Jane MacLeod on or