

Appendix B2 – Whistleblowing Process v2



# **Whistleblowing**

## **Process**

**Version – v2**

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# 1. Overview

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## 1.1. Introduction

Post Office is committed to conducting business with the highest standards of honesty, integrity and openness. Protecting our colleagues, postmasters and customers is our number one priority, and this includes protecting those that raise concerns. Those that whistle blow or report their concerns are actually displaying their loyalty and desire to 'do the right thing'.

This is particularly the case where colleagues are aware of, or suspect, wrongdoing which affects others (e.g. customers, colleagues, members of the public, or Post Office).

A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur. Any suspected wrongdoing should therefore be reported as soon as possible.

## 1.2. What is Whistleblowing?

"Whistleblowing" refers to the act of exposing potential or actual wrongdoing, misconduct and/or dangerous practices by reporting it either internally within an organisation, or to an external party, for example to a regulator.

Individuals should raise a concern if they are aware of, or suspect, wrongdoing which affects others (e.g. customers, members of the public, colleagues or the Post Office). Some examples (this is a non-exhaustive list) of situations where an individual may raise a concern are:

- Financial Crime including Fraud, Money Laundering and financing of terrorism,
- Giving, offering or taking of bribes,
- Financial mismanagement,
- Misreporting,
- Practices that could put individuals or the environment at risk,
- Breach of Post Office internal policies and procedures (including the Code of Business Standards),
- Concerns about slavery or human trafficking, and
- Any conduct likely to damage Post Office's reputation.

## 1.3. Protecting the Whistleblower?

Post Office has a statutory obligation to protect whistleblowers and will support any individual who raises genuine concerns as detailed in the business Whistleblowing Policy, even if they turn out to be mistaken. In respect of a certain class of person (broadly "staff" as defined in the policy) Post Office has a statutory obligation not to subject such persons to detriment or to dismiss them for whistleblowing.

Within Post Office, whistleblowers protected by law include:

- an employee, such as back office, Directly Managed Branch employees
- a trainee, such as a graduate employed by Post Office
- an agency worker

In order to encourage reporting of wrongdoing, Post Office will, where appropriate, and to the extent possible, follow equivalent principles to encourage, receive and investigate

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incidents of whistleblowing by Postmasters, Agent Assistants, and members of the public and will not subject any such persons to any detriment (including the termination of any contract or relationship with Post Office) for raising a genuine whistleblowing concern in an appropriate manner.

Post Office will, at all times, respect the confidentiality and protect the whistleblower's identity, however:

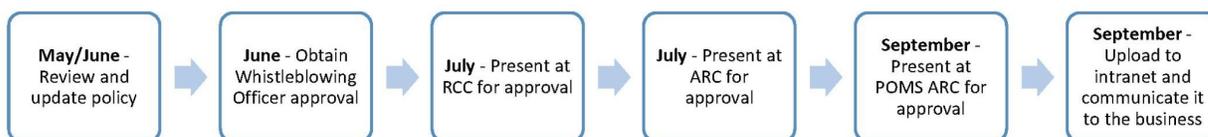
- It may be necessary in the course of an investigation to share this information with a relevant stakeholder (e.g. an investigator).
- There is no requirement for a whistleblower to provide personal contact information, but not providing this information may reduce Post Office's ability to undertake a thorough investigation into the concerns raised.

### 1.4. Whistleblowing Policy

The Whistleblowing policy is part of the Post Office Ltd Key Policies and can be located on the intranet. The policy has been established to set the minimum operating standards relating to the management of Whistleblowing throughout the Group<sup>1</sup>. It is one of a set of policies which provide a clear risk and governance framework and an effective system of internal control for the management of risk across the Group. Compliance with these policies supports the Group in meeting its business objectives and to balance the needs of shareholders, employees and other stakeholders.

The General Counsel has overall accountability to the Board of Directors for the implementation of controls ensuring Post Office meets its Whistleblowing obligations. However, the Financial Crime Team are responsible for maintaining and ensuring the policy is up-to-date. The policy is updated annually in July and is then presented for approval at the Risk and Compliance Committee (RCC) and the Audit, Risk and Compliance Committee (ARC). The Whistleblowing policy may be updated sooner if there are changes in legislation or a significant incident.

The following diagram shows the high-level journey of the policy update (dates could change).




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<sup>1</sup> "Post Office" and "Group" mean Post Office Limited and any wholly owned subsidiary that formally adopts this policy.

## 2. Reporting Channels

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### 2.1. How is Whistleblowing reported?

There are multiple ways in which colleagues can report a concern:

- By contacting their line manager or HR Director
- By contacting the "Speak Up" line on **GRO** or via **GRO** which is a secure on-line web portal
- Direct to the Whistleblowing Officer or the Whistleblowing Inbox **GRO**

It is also possible for individuals to make whistleblowing reports via other communications methods into different parts of the business, i.e. Customer complaints, calls to BSC, Executive Correspondence team and Grapevine. These may be verbal or written communications and may often be in the form of a complaint. Further guidance has been provided to these teams which instructs them to redirect all potential whistleblowing reports to the Whistleblowing mailbox.

### 2.2. Whistleblowing Officer

Post Office has appointed the General Counsel (Ben Foat) as the Whistleblowing Officer, refer to Section 6 Key Contacts. A whistleblower may choose to directly report to the Whistleblowing Officer via various channels, including telephone, post or email.

### 2.3. Speak Up Service

Speak Up Line is a 24/7 confidential reporting service provided by NAVEX Global (formally Expolink Europe Ltd and InTouch MCS Ltd.)

#### 2.3.1. Speak Up reporting channels

The Speak Up service offers reports to be made using the following:

- 24/7 Confidential hotline on **GRO**, or
- Via the secure on-line web portal: **GRO**

Once a report has been submitted the reporter will be given a reference number, which they can use to call back/log in to check the progress of the case.

#### 2.3.2. Speak Up Portal

All reports submitted via Speak Up reporting channels can be accessed via the Speak Up Portal, **GRO**. The following image is an example of the portal.

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The screenshot displays the ETHICSPPOINT Incident Management interface. The left sidebar contains navigation options: Home, Add Widgets, Cases, Open New Case, Assignments, Analytics, and Admin. The main content area is divided into two sections: 'Unassigned Cases' and 'New and Updated Cases'. Both sections feature a table with columns for Priority, Source, Case #, Date Opened, Assigned Tier, Primary Issue, and More Info. The 'Unassigned Cases' table lists five cases, including Case # 18 (Safety Issues and Sanitation), Case # 17 (Accounting/Audit Irregularities), Case # 16 (Customer Relations), Case # 15 (Accounting/Audit Irregularities), and two Legacy Data A cases. The 'New and Updated Cases' table lists four cases, including Case # 14 (Theft of Cash). A notification bubble with a question mark is visible in the bottom right corner of the interface.

Priority	Source	Case #	Date Opened	Assigned Tier	Primary Issue	More Info
	Hotline	18	09/11/2020	Post Office	Safety Issues and Sanitation	More Info...
	Hotline	17	08/26/2020	Post Office	Accounting/Audit Irregularities	More Info...
	Hotline	16	08/24/2020	Post Office	Customer Relations	More Info...
	Hotline	15	07/22/2020	Post Office	Accounting/Audit Irregularities	More Info...
		uauSKFL6	05/19/2020	Legacy Data A	Unassigned	More Info...
		oYVFO3nc	04/16/2020	Legacy Data A	Unassigned	More Info...

Priority	Source	Case #	Date Opened	Assigned Tier	Primary Issue	More Info
	Hotline	18	09/11/2020	Post Office	Safety Issues and Sanitation	More Info...
	Hotline	17	08/26/2020	Post Office	Accounting/Audit Irregularities	More Info...
	Hotline	15	07/22/2020	Post Office	Accounting/Audit Irregularities	More Info...
	Hotline	14	06/17/2020	Post Office	Theft of Cash	More Info...

An automated email is sent to each user when a new report has been submitted or there are any updates on existing reports (this includes notification if a reporter has checked the case status). Further information and user guides can be located within the Whistleblowing Teams site.

### 2.3.3. EthicsPoint Portal Access

Currently only the following have access to the EthicsPoint Portal:

- Sally Smith (Head of Financial Crime/MLRO)
- Paul Blackmore (Senior Financial Crime Manager)
- Vitor Camara (Senior Financial Crime Manager)
- Chris Jones (Compliance Officer)
- Angela Bishop (Compliance Officer)

Any additional access requests must be made by one of the above and made directly to Navex (refer to Section 6 Key Contacts). All new requests should only be made under the approval of the Whistleblowing Officer.

### 2.3.4. Navex Contract

NAVEX Global, formerly known as Expolink Europe Limited and InTouch MCS Ltd, is contracted to provide the external reporting telephone hotline and web portal. The contract is effective as of 5<sup>th</sup> March 2020 and remains in effect until terminated. The annual fee for the service is £9,270 and the fee covers the following:

- Hotline (Dedicated phone line & web portal for reporters)
- Incident Management (System to access and manage reports)
- Telephony (Set up of hotline)
- Gateway (Access to supported NAVEX Global solutions)

The annual fee is invoiced in July with payment due by the end of August each year.

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### 2.4. Whistleblowing Mailbox

The Whistleblowing Mailbox ([GRO](#)) is a point of contact for all whistleblowers and internal stakeholders such as investigating managers. The mailbox must be monitored daily to ensure all emails are actioned in a timely manner. The following are some best practices when managing this mailbox:

- All emails are worked within 24 hours of receipt, including new reports (refer to Section 3 Whistleblowing Reports).
- All emails sent from this mailbox will be automatically saved to your personal sent items. You should manually move these emails to the 'Whistleblowing Sent Items' Folder to ensure other users can have sight of it, if needed.
- All emails relating to active cases or are still being worked should remain in the Inbox. Once the case is closed/email worked then it should be moved to the 'Closed Case Folder'.

The mailbox access is restricted, and access request must be made through Service Now, accessed via the intranet. All new requests (and deletions) **must** be approved by the Whistleblowing Officer.

### 2.5. Front line teams

Due to the nature of our branch network, Post Office recognises that in some cases Postmasters, Agent Assistants and members of the public may be best placed to identify wrongdoing. Whistleblowing is normally reported to the Whistleblowing Officer, either directly or via the "Speak Up" Line. However, whistleblowing can be reported via other communication methods into different parts of the business. These teams are:

- Customer complaints
- Branch Support
- Executive Correspondence Team (ECT)
- Grapevine

These may be verbal or written communications. A process has been established that these teams escalate all Whistleblowing reports directly to the Whistleblowing Officer (via the mailbox) to manage. Appendix A details the guidance provided.

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### 3. Whistleblowing Reports

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#### 3.1. New Reports

Whistleblowing reports are most commonly received via the Speak Up Line, Whistleblowing mailbox and/or via an internal front line team. Regardless of the reporting methods, all reports **must** be logged, reviewed and assigned for investigation within 24 hours of receipt.

#### 3.2. Whistleblowing log

The Whistleblowing log spreadsheet is located on the Whistleblowing Teams site. This log must be constantly updated and ensures that there is a clear audit trail for each report. The following table provides a description of each heading and how it should be completed.

Table Heading	Description
Whistleblowing Log Reference	This field is automatically populated when a date is entered correctly in the "Date Referred" Column.  All documents relating to this entry should be saved with the reference in its title, and stored where appropriate.
Date referred	The date of the complaint received by the Whistleblowing Officer
Referred by	The name of the team or individual referring the complaint to the Whistleblowing Officer
Referral reference	Any reference numbers assigned to the complaint by the referring team or individual
Area of complaint	Select from the drop down menu the main area in which the complaint falls under.  If more than one, then add commentary of additional areas in the "Nature of Complaint" column.
Business Area affected	Select from the drop down menu the main area affected in which the complaint falls under.  If more than one, then add commentary of additional areas in the "Nature of Complaint" column.
Reporter Type	Select from the drop down who reported the allegations e.g. Employee, Postmaster, Anonymous
Subject Type	Select from the drop down who the reports relates to e.g. Employee, Postmaster, Post Office Ltd
Location or Branch (is applicable)	Add the name of the branch, CViT depot or head office location if detailed in the report and/or applicable
Nature of complaint	Free format text to provide a high level summary of the nature of the complaint
Complaint referred to	Names of any individual(s) or team(s) that the complaint is referred to by the Whistleblowing Officer for further action

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Action/Investigation Summary	A high level summary of actions or investigation to be undertaken.
Date of follow up	A follow up date for the Whistleblowing Officer to review progress of the complaint and any investigation
Follow Up Summary	Free format text to provide a high level summary of the progress being made and concluding results
Status (Open or Closed)	Drop down menu, Open or Closed
Date closed	The date of the complaint closed by the Whistleblowing Officer
Evidence Found	Have any of the allegations raised been confirmed during the investigation, enter either Yes or No
Action Taken	Has any action been taken to address any concerns identified during the investigation? Enter either Yes or No

Once the case has been logged, a supporting folder must be created on the Whistleblowing Teams page, refer to Section 5 Document Storage. The title of the folder should match the case reference number for the Whistleblowing log. Within this folder all information in relation to the report should be stored here, this includes the following (but not limited to):

- The original report (Email, scanned copy or downloaded Expolink report)
- Email/documentary exchanges with relevant parties
- Any evidence obtained
- Details of case outcome

### 3.3. Assigning Reports

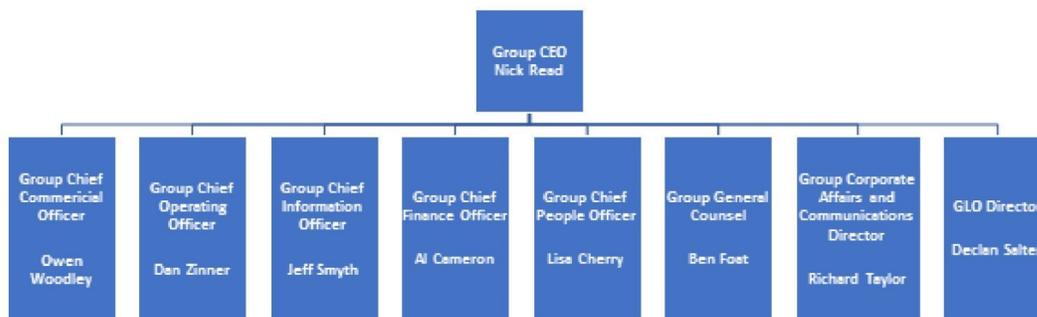
Each report must be reviewed to determine priority. If considered sensitive, serious, repeat (potential trend), this must be referred to the Whistleblowing Officer for guidance on who should undertake the investigation. Before assigning for investigation the following must be considered:

- Should the report be investigated internally or externally (e.g. allegations of fraud by a Postman would be sent to Royal Mail Whistleblowing Officer to progress)
- What is the report about?
- Who is the report about? i.e. Direct employee, Agent or Agent Assistant
- Consider if we need to contact the reporter (if possible) to gather further information (if anonymous via Speak Up portal, a request will be posted for the reporter to contact with further information and provide assurances about confidentiality)
- Which business area is the report about?
- Are there any steps that need to be taken to ensure impartial investigation? Is Legal advice required?
- Are there any potential conflicts of interest with the person you intend to assign it to? i.e. Are they close friends with the individual?

#### 3.3.1. Assigning reports internally

Once the appropriate business unit has been identified, then the report should be assigned to the relevant Group Executive (GE). In most cases, the GE member will then appoint the relevant person within their area to conduct the investigation.

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Over time it has been established that reports of a certain nature do not need to be assigned to a GE member but to an appropriate Senior Manager, these are:

- Reports of fraud/theft within the branch network are assigned to Mark Raymond, Head of Security.
- Reports of Postmaster contractual breaches are assigned to Tim Perkins, Head of Security, Safety and Loss Prevention
- Reports of Bullying & Harassment are assigned to Lee Kelly, Employee Relations and Policy Director.

### 3.3.2. Assigning reports externally

On occasion, reports may involve an individual not employed by Post Office and/or an external party would be in the best position to investigate the matter. Examples of these are as follows;

- An agent assistant for a multiple partner (i.e. WHSmith) reports Bullying & Harassment by a colleague.
- An allegation of fraud is made about a Postman, employed by Royal Mail.

### 3.3.3. Report Referral Email Template

All reports should be referred to the appropriate individual to investigate using the email template below. Whistleblowing reports must **NOT** be shared with generic team mailboxes, emails linked to Dynamics 365, with parties with no business need or with parties named in the report.

**\*Greeting\*,**

A Whistleblowing Report has been raised with allegations about **\*Subject/Location\***.

**Case Summary:**

**\*Add high level summary, and only including relevant information \***

**Action Required:**

Due to the nature of the allegations the below case has been assigned to you to undertake a full investigation and take necessary action. You are required to provide the outcome of your investigation and advise if there are any significant concerns relating to these allegations that need to be escalated further.

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In some cases, it may be required to delegate or seek help from another team. In these instances, please ensure the information is treated sensitively and only relevant information shared with the person directly (do not forward to generic mailboxes).

**Timescales:**

Please could you provide an update by *\*add date\** - *Usually Two weeks*

This case is classified as **Strictly Confidential** - Information that should be distributed in a highly controlled manner; where the Information Owner requires that the information is shared only within a known set of individual Information Users. Further guidance on Information Classification Standard click [here](#).

*\*Add appropriate signature\**

### 3.4. Closing Reports

Post Office is not obliged to share any information in relation to outcomes of internal investigations. In most cases the reporter is given acknowledgement that their report has been investigated and where appropriate, necessary action has been taken. This is sent via the reporting channel they have used or have given the Whistleblowing Officer permission to use (Speak Up line, e-mail or phone call). Where a report received is anonymous, whistleblowers will not ordinarily be able to receive feedback and details of any action taken.

When Speak Up Line reports are closed on EthicsPoint website a final message is posted for the reporter to view. As each case is different there is no exact wording to use, however, the following examples should be used as guidance.

*"Thank you for raising your concerns. We have completed our investigation and, where appropriate, we will take any necessary actions.*

*Please note that while all disclosures are taken very seriously, we are not obliged to share information in relation to outcomes of internal investigations.*

*Post Office"*

*Or*

*"Thank you for raising your concerns. We have completed our investigation and, where appropriate, we will take any necessary actions.*

*Please note that while all disclosures are taken very seriously, we are not obliged to share information in relation to outcomes of internal investigations.*

*To your points raised regarding your employment, you may wish to contact the Advisory, Conciliation and Arbitration Service (ACAS) and/or Citizens Advice Bureau for free and impartial information and advice on all aspects of workplace relations and employment law.*

*Post Office"*

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The Executive Complaints Team (ECT), Customer Support and BSC should be informed of case closure as they may still have an outstanding complaint.

There are currently no processes to send outcome notifications to Grapevine or reports received via other channels (I.e. Post). However, in some instances it may be appropriate to send notification of case closure.

## 4. Communication & Awareness

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### 4.1. Whistleblowing Log

The Whistleblowing log should be monitored and updated on a regular basis. If a case has been referred to someone, then they should be providing regular updates. If not, then it will be required to contact them directly to get updates to ensure reports are being dealt with.

### 4.2. MI

The Whistleblowing log should be monitored regularly to ensure that it is up-to-date. Regular updates must be obtained from the investigating manager to ensure the report is being investigated. The information on the log is used to populate the pivot tables on the MI tab. If this log is not accurate then this will produce incorrect MI.

Each month, generally in the first week, the Whistleblowing MI Pack needs to be produced and shared with the following:

- Ben Foat
- Sally Smith
- Paul Blackmore
- Jonathan Hill

#### 4.2.1 Producing MI Pack

The data from the pivot table is manually copied into the 'Financial Crime and Supply Chain MI' spreadsheet. This file is located on the Financial Crime Teams page and the graphs are automatically updated once the new data is pasted in.

The graphs are then used to produce a Power Point MI Pack using the same template as the Financial Crime & Supply Chain Monthly MI pack.

Monthly MI is provided to the Financial Crime on request and is including in the Financial Crime & Supply Chain Monthly MI pack. There is no defined layout or content requirement for this pack, but the following points should be covered:

- Graphs showing categories, subject types, reporting channels, reporter type and volumes of cases opened and closed. These graphs should show a rolling 12 month period to help identify any trends or spikes.
- Commentary should be provided to support the graphs.
- Any potential issues or concerns identified through the reports should be raised.
- Any news or media articles relating to Whistleblowing.
- Updates from any horizon scanning or industry forums.
- Any changes or potential changes in legislation.
- Any other work undertaken as part of the whistleblowing service.
- Communications planned and/or published to the business.

### 4.3. Communications and Awareness Plan

Since 2017, the Financial Crime Team have delivered a number of communications to raise awareness of whistleblowing across Post Office, including having posters delivered to all back office locations and DMBs, and including whistleblowing within the annual Anti-Bribery & Corruption training which is mandatory for all employees.

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Various communications should be published/delivered throughout the year to increase awareness and promote whistleblowing across Post Office. The team should work with the Security Communications Manager to plan and produce the communication material. The Comms could be an internal poster, a One article and/or a Branch Focus Article. Refer to Appendix B for examples of communications previously published.

After the Internal Audit report in 2019, an employee survey was promoted via One Comm in February 2019. Comms were issued in April 2019 and May 2019 to address issues relating to responders not understanding what whistleblowing meant, not knowing where to find the policy and raising concerns about the anonymity of reports. Communications since then have focused on these areas.

Also during 2019, work was undertaken with the People & Culture Director to raise awareness of business ethics and the importance of speaking up. This included running Business Ethics workshops at the Employee Engagement Conference in May 2019.

### 4.4. Upward Reporting

There are several reports which are produced to inform the business of the effectiveness of the Whistleblowing service.

#### 4.4.1. Annual Whistleblowing Report

This report provides an overview of the recent financial year and generally addresses the following questions:

1. What issues have been highlighted by the annual review of Whistleblowing reports?
2. What actions need to be undertaken to address any issues?
3. What changes to the Policy do we propose and why?
4. What are the implications of these changes?

This report is due in July and presented to the Risk & Compliance Committee (RCC).

#### 4.4.2. Internal Audit Report

The Internal Audit team conducted the last audit of Whistleblowing in January 2019. It was assessed that the Whistleblowing process was rated satisfactory. The next audit will be scheduled by Internal Audit and they will advise when it is due to take place and what is needed from the team.

#### 4.4.3. Annual MLRO Report

The Money Laundering Reporting Officer (MLRO) produces an annual compliance report every January. Although Whistleblowing is not covered within this report, it may be required to advise the MLRO of any financial crime risks or trends which has been identified through the Whistleblowing process.

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## 5. Document Storage

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### 5.1. Microsoft Teams

There is a dedicated Whistleblowing team site on Microsoft Teams and all documentation (including evidence) **must** be stored here. The site is marked as private and access will need to be granted by one of the current members. Click Teams or SharePoint to access the site.

### 5.2. File Storage

The below outlines the current storage structure of the folders within the Whistleblowing Teams page.

<b>Folder</b>	<b>Purpose</b>
General (Main page)	This is the main screen where other folders can be accessed. In addition, key files such as the Whistleblowing log is stored here.
Archive	Historic files should not be deleted and should be stored here if they are no longer required/relevant.
Case Documents	All documentation relating to Whistleblowing reports <b>MUST</b> be stored here in an appropriate sub-folder. The title of the sub-folder must be the case reference number (i.e. 2019-20-009).  Examples of evidence are: <ul style="list-style-type: none"> <li>- Email exchanges with stakeholders/investigating manager.</li> <li>- Open source information/evidence.</li> <li>- Relevant media files.</li> <li>- Scanned documents of any reports made by post.</li> </ul>
Comms	Any communications which have been issued must be saved here. These should be separated by year
Internal Audit	Any documents relating to the review conducted by Internal Audit
Monthly MI	Monthly MI is produced and shared with key stakeholders including the Whistleblowing Officer.
Speak Up Service	Documentation relating to the Speak Up service provided by Navex. This would include user guides, call scripts and a copy of the contract with Navex.

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**6.** Key contacts

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**6.1. Contacts**

General Counsel/ Whistleblowing Officer	Ben Foat	GRO
Head of Financial Crime/MLRO	Sally Smith	GRO
Senior Financial Crime Manager	Paul Blackmore	GRO
Senior Financial Crime Manager	Vitor Camara	GRO
Whistleblowing	Team Inbox	GRO
Financial Crime Team	Team Inbox	GRO
Navex Global	David Osborne	GRO
Navex Global (Accounts Receivable)	Team Inbox	GRO
WHSmith Speak Up	WHSmith Whistleblowing Team	GRO

## 7. Appendix

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### 7.1. Appendix A

#### Whistleblowing

Whistleblowing is the reporting of potential or actual wrongdoing, and there is a legal obligation for Post Office to address the concerns and to protect whistleblowers. Due to the nature of our branch network, Post Office recognises that in some cases Postmasters, Agent Assistants and members of the public may be best placed to identify wrongdoing

Whistleblowing is normally reported to the Whistleblowing Officer, either directly or via the "Speak Up" Line. However, whistleblowing can be reported via other communication methods into different parts of the business, i.e. Customer complaints, calls to NBSC and Grapevine. These may be verbal or written communications. This guidance is designed to provide further understanding to front line teams and help differentiate between complaints and whistleblowing, and ensure that any potential whistleblowing reports are correctly communicated to the Whistleblowing Officer.

#### What is whistleblowing?

"Whistleblowing" refers to the act of exposing potential or actual wrongdoing and/or dangerous practices by reporting it either internally within an organisation, or externally, for example to a regulator.

Individuals should raise a concern if they are aware of, or suspect, wrongdoing which affects others (e.g. customers, members of the public, colleagues or the Post Office). Some examples (this is a non-exhaustive list) of situations where an individual may raise a concern are:

- Financial Crime including Fraud, Money Laundering and financing of terrorism,
- Giving, offering or taking of bribes,
- Financial mismanagement,
- Misreporting,
- Practices that could put individuals or the environment at risk,
- Breach of Post Office internal policies and procedures (including the Code of Business Standards),
- Concerns about slavery or human trafficking, and
- Any conduct likely to damage Post Office's reputation.

#### Who is protected by law

Certain protections are provided for whistleblowers by law. Within Post Office this includes:

- an employee, such as back office, Directly Managed Branch employees
- a trainee, such as a graduate employed by Post Office
- an agency worker

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In order to encourage reporting of wrongdoing, Post Office will seek to provide equivalent protection to Postmasters, Agent Assistants, and Members of the public.

### What a whistleblower should expect?

A whistleblower has the right to raise their concerns anonymously, if they wish to do so. However, not providing details may reduce Post Office's ability to undertake a thorough investigation into the concerns raised.

Even if details are provided, a whistleblower can still ask to remain anonymous. Post Office Ltd has a legal obligation to make every effort to protect the individual's identity.

Post Office Ltd is required to listen to all concerns raised and decide on the necessary actions. Post Office Ltd can keep the whistleblower informed about the actions taken, but can limit this information in order to keep the confidence of other people.

### How to raise a concern

Whistleblowing can be reported via the following channels:

- Their line manager,
- A senior member of the HR Team, or
- If either or both are not available, staff can contact the Post Office's Whistleblowing Officer, who can be contacted by email at:  
[redacted] **GRO** [redacted]
- The confidential Whistleblowing Speak Up service 'Ethicspoint' provided by Navex Global via telephone on [redacted] **GRO** [redacted], or
- Via a secure on-line web portal: [redacted] **GRO** [redacted]

In some instances it may be appropriate for the individual to report in the form of a complaint to Grapevine, the Customer Support Team or the Executive Correspondence Team.

All whistleblowing cases should be treated as highly sensitive and only discussed with the Whistleblowing Officer and those working with the Officer to address the concerns.

### What to do

All whistleblowing reports should be passed to the Whistleblowing Officer, preferably via email. The Whistleblowing Officer will carry out an initial assessment of the issue to determine the scope of any investigation.

The Whistleblowing Officer will decide whether an investigation is appropriate and what form the investigation should take. The type of investigation will depend on the nature of the concern and may be:

- investigated internally
- resolved by agreed action as determined by the Whistleblowing Officer without an investigation
- referred to the police
- referred to a regulatory authority

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If you are unsure as to whether a report is classified as whistleblowing, then you should refer to one of the following.

- The Whistleblowing Policy
- Your line Manager
- Whistleblowing Officer (GRO)
- or the Financial Crime Team (GRO)

### When is it whistleblowing?

Sometimes an individual believes they are blowing the whistle when, in fact, their complaint is a personal grievance. Individuals who make a disclosure under an organisation's whistleblowing policy should believe that they are acting in the public interest. This means in particular that personal grievances and complaints are not usually covered by whistleblowing law.

**Note:** Personal grievances (i.e. bullying, harassment, discrimination) aren't covered by whistleblowing law, unless your particular case is in the public interest.

The following table demonstrates various scenarios, and whether or not it would be considered as whistleblowing.

Whistleblowing	Not Whistleblowing
An Assistant has seen the Postmaster process card payments with someone else's card and with no customer present.	An assistant has suspicions of a customer coming in to purchase large amounts of foreign currency on a regular basis.
A clerk has been selling Bureau de Change and taking a card payment. Then the customer gives the clerk cash as a personal payment for processing their transaction.	A clerk makes a mistake when processing a Bureau de Change sale. Initially processed as a card payment, but then cash payment taken.
Deliberately not checking customers ID where required and there is suspicions this may be linked to card fraud.	A newly hired clerk forgets to ask the customer for their ID.
A customer sends high value parcels on a regular basis. They suspect that an assistant is stealing the parcel, as parcels do not reach the destination when processed by this assistant.	A customer sends a high value parcel but it is never received by the recipient.
A clerk believes that a branch manager is using their knowledge of personal customer information to set up fraudulent accounts.	A customer has received Post Office Money correspondence to their home but addressed to another individual.

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<p>A customer reports that the branch is not opened as listed on the website, and whilst closed they can be seen processing transactions for other people.</p>	<p>A customer complains that a branch is opened for hours different than those stated on the Post Office website.</p>
<p>A clerk complains that the branch manager has made racist/discriminatory remarks to other members of staff and members of the public.</p>	<p>A clerk complains that they feel they are being bullied by their branch manager.</p>

7.2. Appendix B

**We protect whistleblowers’ anonymity**

Our recent whistleblowing survey results revealed some of you are concerned that reports raised by whistleblowers are not treated confidentially. You may have seen this recent news article:

***Revealing a whistleblower’s identity has large financial consequences***

[GRO], was fined £ [GRO] for trying to uncover the identity of an anonymous whistleblower. He had tried to find out the author of two anonymous letters to the Board that expressed concerns about a senior [GRO] employee.

Mark Steward, FCA Executive Director, commented, “[GRO] breached the standard of care required and expected of a [GRO]. He added, “Whistleblowers play a vital role in exposing poor practice and misconduct in the financial services sector. It is critical that individuals are able to speak up anonymously and without fear of retaliation if they want to raise concerns.”

All businesses have a statutory obligation to protect whistleblowers and at Post Office, we believe whistleblowing is a valuable source of information to help us identify and address risks and wrongdoing.

**At Post Office, you can raise your concerns in confidence and without fear of reprisals, even if they turn out to be mistaken. We will always take your concerns seriously, and act on them.**

Remember, to raise a concern, you can:

- Contact your line manager or HR Director
- Contact the Speak Up confidential reporting service run by Expolink Europe Ltd on [GRO] or click **here**

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-Contact the Whistleblowing Officer by **email**

**If you have any questions or would like further information, please email**  
GRO

# Do the right thing, SPEAK UP

Post Office is committed to conducting business with the highest standards of honesty, integrity and openness.

Colleagues can raise concerns in confidence, secure in the knowledge that we will take those concerns seriously and act on them.

There are three ways in which colleagues can confidentially report a concern:

1. By contacting their line manager or HR Director
2. By contacting the Speak Up confidential reporting service run by InTouch MCS Ltd on GRO or via [www.intouchfeedback.com/postoffice](http://www.intouchfeedback.com/postoffice)
3. By contacting the Whistleblowing Officer at GRO



## Where can I find out more?

For further information please see the Whistleblowing policy which can be found on the Intranet home page under Our Key Policies.

For back office display only



Appendix B2 – Whistleblowing Process v2

7.3. Appendix C

**Whistleblowing Survey Results**

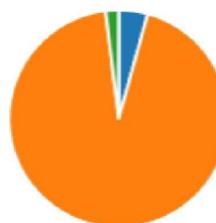
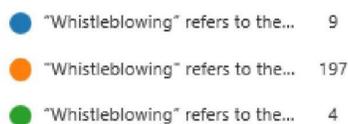
Purpose: to find out what back office employees understand about whistleblowing at Post Office. The results will help us identify where improvements can be made to our whistleblowing awareness across the business.

**Summary**

- The survey ran from 8 February – 1 March 2019
- 210 responses were received
- Available on the Intranet here

**1. What is Whistleblowing?**

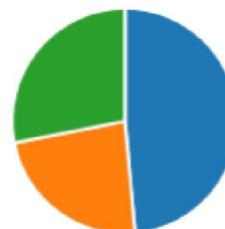
- "Whistleblowing" refers to the act of exposing bullying & harassment.
- "Whistleblowing" refers to the act of exposing potential or actual wrongdoing by reporting it either internally within an organisation, or externally, for example to a regulator.
- "Whistleblowing" refers to the act of exposing actual wrongdoing within a third party organisation.



*Results: 93% answered the question correctly; 7% answered the question incorrectly (197 responded correctly; 13 responded incorrectly)*

**2. Do you know where the Whistleblowing Policy is?**

- Yes
- No
- Not Sure



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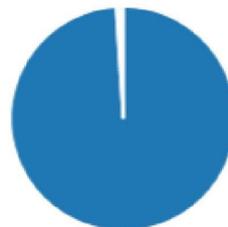
*Results: 48% said they know where the policy is and 52% said they either do not know or are not sure where the whistleblowing survey is.*

*(24% said they did not know where the policy is; 28% said they're not sure where the policy is. (102 respondents said they know where the whistleblowing policy is, 49 said they do not know where it is; 59 said they are not sure where it is.))*

**3. Who can you speak to if you want to raise a concern?**

- Contact your line manager or HR Director or the Whistleblowing Officer at **GRO**
- Talk to a colleague and do not progress any further with your concern.
- Approach the individual whose actions you are concerned about and raise your concerns directly with them.

- Contact your line manager or... 208
- Talk to a colleague and do not... 1
- Approach the individual whos... 1



*(Results: 99% answered the question correctly, 1% incorrectly.)*

**4. How do you report your concern if you do not feel able to speak to your line manager?**

- Tell a colleague, but no-one else.
- Contact the Speak Up confidential reporting service run by InTouch MCS Ltd on **GRO** or via **GRO**
- Contact the HELP Employee Assistance – **GRO** 24 hours a day, 7 days a week.

- Tell a colleague, but no-one el... 4
- Contact the Speak Up confide... 196
- Contact the HELP Employee A... 10



*(93% know they can contact the SpeakUp service to report a concern if they do not feel able to speak to their line manager. 2% said they would tell a colleague*

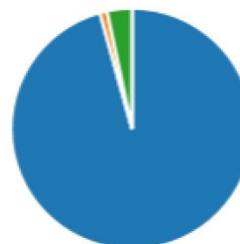
Appendix B2 – Whistleblowing Process v2

*about their concern, but no one else. 5% said they would contact the harassment & bullying service.)*

**5. What is the SpeakUp service?**

- A confidential reporting service where you can report in complete confidence serious workplace concerns relating to Post Office which you are uncomfortable about raising in any other way.
- A monthly face to face meeting where attendees are encouraged to speak up about wrongdoing.
- A confidential reporting service where you can report bullying & harassment.

- A confidential reporting servic... 201
- A monthly face to face meetin... 2
- A confidential reporting servic... 7

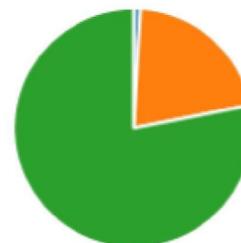


*(96% know what the SpeakUp Service is, just under 1% thought it is a monthly face to face meeting, 3% thought it was a service to report bullying & harassment)*

**6. What does Post Office do with whistleblowing reports?**

- Whistleblowing reports are filed in the Whistleblower’s HR file.
- Don’t know.
- In all instances any whistleblowing reports, regardless of reporting method, will be passed to the Whistleblowing Officer who will retain confidentially.

- Whistleblowing reports are fil... 2
- Don't know. 44
- In all instances any whistleblo... 164



*(1% thought whistleblowing; 20% said they did not know where the whistleblowing reports are filed; 79% correctly said in all instances any whistleblowing reports, regardless of reporting method, will be passed to the Whistleblowing Officer who will retain confidentially.)*

**7. How do you expect to be treated if you raise a concern?**

- If you blow the whistle you may be dismissed from your role.
- Post Office are committed to respecting the confidentiality of all whistleblowers, including those who wish to remain anonymous.

Appendix B2 – Whistleblowing Process v2

- If your concern is mistaken, it will impact your performance review.



*(2% said that if you blow the whistle you may be dismissed from your role; 95% agreed Post Office are committed to respecting the confidentiality of all whistleblowers, including those who wish to remain anonymous; 3% said that if your concerns are mistaken, it will impact your performance review.)*

**8. Where would you go for more information or support on whistleblowing?**

- The Whistleblowing pages found on the intranet under the PeopleHub or your line manager.
- Google search online.
- Don't know.



*(84% said the whistleblowing pages are found on the intranet under the People Hub or your line manager; 5% said they would look for support on whistleblowing with a Google search online; 11% said they did not know where to look for more support on whistleblowing.)*

**9. What is the correct process for reporting bullying & harassment?**

- Discuss the issue with your Line Manager, a trusted colleague or a trade union representative or contact the HELP Employee Assistance – **GRO** **GRO** hours a day, 7 days a week.
- Contact the Speak Up confidential reporting service run by InTouch MCS Ltd on **GRO** or via **GRO**

## Appendix B2 – Whistleblowing Process v2

- Don't know.



(62% said they would report bullying & harassment in the correct way, by discussing it with their line manager a trusted colleague or a trade union representative or contact the HELP Employee Assistance – GRO 24 hours a day, 7 days a week; 27% said they would report bullying and harassment via the whistleblowing SpeakUp Confidential tool; 11% said they did not know.)

Based on the survey results, these are the areas that need to be addressed in whistleblowing communications and awareness and training:

1. There needs to be some improvement in employees' understanding that whistleblowing refers to the act of exposing potential or actual wrongdoing by reporting it either internally within an organisation, or externally, for example to a regulator.
2. We need to raise considerable awareness about where the whistleblowing policy sits. The majority of survey respondents said they either did not know, or weren't sure where the whistleblowing policy is found.
3. Some awareness needs to be raised about how you should report a whistleblowing concern, i.e. contact the Speak Up confidential reporting service run by InTouch MCS Ltd on GRO or via GRO and what the speak up Services is.

**10. What can Post Office do to improve the Whistleblowing service (e.g. do you think it would encourage colleagues to report more if it was called 'Post Office Confidential', is the service promoted enough)? Full answers can be found here.**

**Occurring themes in this section:**

1. People do not know the whistleblowing service is confidential
2. Make it clear where to find whistleblowing policy information e.g. front page of the intranet site?

## Appendix B2 – Whistleblowing Process v2

3. The service isn't promoted enough
4. We need to remind people about the service more often – quarterly/yearly reminders suggested

### **No clear answer on whether it should be renamed Post Office Confidential:**

1. Whistleblowing can sound a bit intimidating for some people, or they are doing something wrong. Post Office Confidential sounds more approachable.
2. It would help if it would be called Post Office Confidential

### **Quotes from respondents:**

“Employees need to understand what happens when the individuals the whistle blowing report refers to are the same people that receive the reports (i.e. GE members). Within CIO the honest challenge culture doesn't really exist yet. Even lead team members within the department don't feel honest challenge can happen anywhere except in a public open forum where they can't be personally attacked. It's very much a toe the line or leave if you don't like it culture. Until this is resolved staff won't trust that whistle blowing will have any real effect. I've seen things myself over the last 18 months that have made me want to blow the whistle. But I haven't because of fear of the ramifications on my career and others in my team.”

“There is a little confusion as speak up and whistleblowing are often said in the same sentence - even in the quiz - I think there is confusion about similarities and differences between the two.”

“Make it clearer that if a whistleblower has done the correct thing - it is right, it's still seen as you'd be punished for whistleblowing in some way.”

“Whistleblowing is a scary title - there are stories in the press about how badly whistle-blowers are treated. It puts people off. I for one would be extremely reluctant to report anything even if i was experiencing it myself. I don't have the faith that it would be treated properly. I have been around a long time and sadly i still feel this way. Reality is a lot difference from policy!!”

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## 8. Version Control

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<b>Date</b>	<b>Version</b>	<b>Updated by</b>	<b>Change Details</b>
26/10/2020	2	Paul Blackmore	Sign off by stakeholders
14/10/2020	1.1	Paul Blackmore	Annual review and update
12/05/19	1	Vitor	Document creation