

## Whistleblowing in POL

### Policy

- Existing policy in place - in need of refresh
- Revised policy and investigations guidance have been drafted with help of Nisha Marwaha in Legal – covers employees, contract workers etc. but **not** subpostmasters (agents & operators)
- Outstanding question on whether we should have 'Whistleblowing Officer(s)' in POL
- Policy is due to be reviewed by ARC in May

### Reporting facilities

- 'Speak Up' line provided by third party whistleblowing specialists (In Touch MSC) – procurement process carried out in 2013 and three year contract awarded (value £22.3k/year)
- Reports can be made by telephone (speaking to an operator or leaving a message) or web portal
- POL has access to reports through a case management portal (currently Georgina and Karima have access)

### Whistleblowing reports

- Line very poorly used – average of about 1 call every six months (the last one was a misdirected call relating to a Royal Mail matter)
- Most recent case (allegations made by GRO report made by e-mail and then referred to Risk and Compliance by HR

### Communication and promotion

- Awareness of the line is very low
- Comms plan is being prepared – due to roll out in April

### Outstanding issues

- Clarification of ownership of the Whistleblowing Policy (HR have historically been unwilling to own it)
- Dave Mason failed to include the costs of the whistleblowing line in the Risk & Compliance budget for 2015/16 – we have been invoiced for the year commencing 1<sup>st</sup> April 2015 and InTouch are awaiting payment (we are entering the last year of the three year contract)
- Consideration of alternative options – in the past options such as Grapevine (Security helpline) or the HRSC have been explored but not considered suitable because of a perceived lack of independence and confidentiality. We will be having a discussion with Security to re-explore whether the Grapevine option is feasible.
- Whether to extend the line to agents – this has been considered in the past and decided against because of practical difficulties when dealing with other companies' employees and because protection under PIDA does not extend to subpostmasters and their assistants.