

Employee Disclosure (Whistleblowing) (G7)

1. Purpose

Royal Mail Group attaches great importance to the ethical conduct of its business and to the protection of its good reputation.

This statement sets out Royal Mail Group policy for enabling employees to disclose information ("whistleblowing") about breaches of its policies and standards of conduct. This policy will be supported by each of the Royal Mail Group businesses, which will maintain arrangements for giving confidential and fair consideration to such disclosures, and for taking appropriate and effective remedial action.

The Public Interest Disclosure Act 1998 gives workers the right not to be subjected to any detriment if they make a protected disclosure. The dismissal of a worker because they have made a protected disclosure is automatically unfair.

Employee disclosure means an allegation made by an employee that Royal Mail Group policy or standards are being broken or disregarded, or that unethical, unlawful or unprofessional practices are being pursued. This may concern criminal activity or corruption, financial irregularity, conflict of interest, malpractice in relation to suppliers or clients, harassment, bullying, neglect of duty, neglect of health and safety hazards, etc.

Such concerns may be raised where the employee feels that his or her line manager or head of department is implicated in the behaviour complained of, or that for some reason they may not be willing or in a position to provide an impartial hearing or remedy. The employee may feel threatened or otherwise inhibited by the consequences of raising their concerns by the normal management channel or via the grievance procedure.

This policy does not form part of an employee's contract of employment and applies to all employees of Royal Mail Group.

Reserved Powers & Delegated Authorities framework

Overall accountability is held by the Head of Employee Relations, Royal Mail Group. Any change to this policy must be signed off by the Head of Employee Relations, Royal Mail Group.

Each Business Unit will nominate a Senior Manager(s) to be the contact point for dealing with employee disclosures and these managers will ensure that any disclosures are investigated fully and fairly. These contacts can be found in section 4.

2. Link to Accountabilities

➤ **200 Leadership behaviours for Royal Mail linked to Royal Mail commercial direction**

3. Policy

3.1 Royal Mail Group is committed to trust and openness in its dealings with all employees, and to listening to their views. It has adopted a **Code of Business Standards**, and is determined to see that the standards in it are effectively observed. It seeks to foster a working environment where line managers are accessible to their staff and can be expected to give a fair hearing to any legitimate concern which is raised with them, and to respond positively.

3.2 In normal circumstances, employees should feel able to discuss any problem at work with their line manager or, failing that, to raise the issue with the next most senior manager or the head of department. "Employee disclosure" concerns those occasional cases where the employee feels that these routes cannot be used without compromising their position, or that the issue is so serious that it needs to be escalated to a senior level of management. An employee may also use the disclosure system if an approach by the normal channel has been tried but has failed to provide an effective remedy of the abuse complained of.

3.3 In an organisation the size of Royal Mail Group, situations may occasionally arise where the interests or standards of the organisation are put at risk by the misguided, irresponsible or even criminal actions of a few individuals or a group of people. Reporting such behaviour is not disloyal: it is protecting the good reputation of Royal Mail Group and of the honest majority of its employees. It is essential that there should be a safe and confidential channel by which employees can have concerns about unethical or unlawful conduct impartially investigated by someone outside their department. Employees should have a means of expressing any anxieties inside the organisation, and feel confident that justice can be obtained by elevating the problem to a senior level. This is preferable to keeping silent, or feeling that their only recourse is to pass information to the media or to some outside body, or even to resign. Each business has a duty to provide such a channel. Employees have a duty not to disclose a grievance to the media before they have raised it with management and have made a reasonable attempt to resolve the issue internally by following the procedures described in this guideline.

3.4 Whilst the existence of a safe channel for employee disclosure is important to ensuring the ethical health of the organisation, it needs to be sensitively managed. It should support morale and promote employee confidence and loyalty in the organisation. Genuine complainants must be encouraged and protected, but malicious complainants are to be discouraged.

3.5 Royal Mail Group will take disciplinary action as appropriate against anyone who is shown to have acted in an unethical or unlawful manner, in breach of its *Code of Business Standards* or other standing instructions. Criminal penalties may also be appropriate in serious cases.

3.6 Employees who raise legitimate concerns under these guidelines in good faith must not suffer disciplinary action or discriminatory treatment as a result, even if subsequent enquiry concludes that the complaint cannot be substantiated in whole or in part. However, disciplinary action will be taken against any employee who is shown to have used the

employee disclosure system deliberately, maliciously or mischievously to lay false or misleading information. Penalties may range from reprimand when the integrity and reputation of another employee have been impugned without reasonable cause, to dismissal in serious cases where there has been a knowingly false accusation of criminal activity.

Contacts

Business Unit	Employee Disclosure contacts
Parcelforce Worldwide	Peter Walls, Head of Employee Relations
Post Office Ltd	Colin Stretch, P&OD Advisor, Network & Sales
Letters - Commercial	Dominic Scarlett, Head of P&OD Commercial
RM Letters	Jonathan Allen, Head of Employee Relations, Royal Mail Group
Central Functions - Group	Karen McKay, Head of P&OD Central Functions
4. Links to other reference material (policies, processes, procedures, etc.)	

4.1 Code of Business Standards

4.2 Employee Disclosure Guidelines (size 35k)

4.3 G5 Conflicts of Interest

4.4 G9 Gifts

4.5 G10 Hospitality and Entertainment

4.6 The Public Interest Disclosure Act 1998

4.7 G13 Data Protection Act 1998

4.8 Royal Mail Corporate Security, GRO

4.9 Corporate Social Responsibility, GRO

4.10 Post Office Ltd Security, GRO

4.11 Bullying & Harassment helpline, GRO

4.12 Public Concern at Work, GRO

5. Document details

5.1 Owner : Head of Risk and Assurance

5.2 Enquiry point :

Elizabeth M Law
Head of Risk and Assurance
Corporate Centre
Royal Mail Group plc
Internal Audit & Risk Management
Rowland Hill House,
Boythorpe Road,
CHESTERFIELD,
S49 1HQ

Postline:
Phone:

5.3 Effective from : 28/07/2006

5.4 Version : 1.1 (revised)

5.5 Review date : November 2007

5.6 Last updated : October 2006