



Angard Staffing Whistleblowing Policy

Angard Staffing is committed to conducting business with the highest standards of honesty, integrity and openness, and where our employees feel able to raise concerns. This policy outlines how workers of Angard Staffing can raise genuine concerns about potential wrongdoing at the earliest possible stage.

Main topic areas

- Overview
- Policy statement
- What is Whistleblowing?
- Raising a Whistleblowing concern
- Confidentiality
- Underpinning legislation
- External disclosures
- Investigation and Outcome
- Responsibilities
- Contacts
- Related documents
- Review

Getting help

Please contact the Angard Helpline Number 0333 240 8502 or email angard.employee@reedglobal.com.

For web access go to: www.angardstaffing.co.uk.

Overview

This policy applies to all employees of Angard Staffing (**Angard**). Angard employees will, from time-to-time, be assigned to work as temporary workers in the Royal Mail Group Limited (**Royal Mail**) and this policy will continue to apply to them on such assignments.

This policy does not form part of contracts of employment. Angard reserves the right to amend this policy from time to time.

This policy is in force with effect from 1st April 2014.

Policy statement

Angard is committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

The aims of this policy are:

- To encourage staff 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.
- To provide staff with guidance as to how to raise those concerns.
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

What is whistleblowing?

Whistleblowing is the disclosure of information that is in the public interest, which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- failure to comply with any legal obligation or regulatory requirements;
- bribery;
- financial fraud or mismanagement;
- negligence;
- breach of our internal policies and procedures including our Code of Business Standards;
- conduct likely to damage our reputation;
- unauthorised disclosure of confidential information;
- the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above, which is in the public interest. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

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.

If you are uncertain whether something is within the scope of this policy you should seek advice by email to speakupenquires@royalmail.com.

Raising a Whistleblowing concern

You should contact the "Speak Up" confidential helpline which is run by InTouch MCS Ltd, a third party supplier. Access to the helpline can be made by phone on 0800 0971131 or via an on-line web service at www.intouchfeedback.com/royalmail. InTouch will treat concerns in complete confidence and the worker does not have to provide contact details.

In contacting 'Speak Up' you will be requested to provide information about your concern, for example, the history of the concern, relevant individuals and the reason why you are particularly concerned about the situation.

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. All calls to the Speak Up helpline will be acknowledged within five working days.

Confidentiality

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 contact the Speak Up helpline immediately. If the matter is not remedied you should raise it formally using the Angard Grievance Policy.

Other workers must not threaten or retaliate against Whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

Confidentiality is not the same as anonymity. Workers who raise concerns via whistleblowing procedures are sometimes understandably concerned about their position, and may wish to remain anonymous.

However, it is often difficult to conduct an effective investigation without being able to discuss it fully with the person who raised the concern. Although the business will attempt to investigate anonymously raised concerns wherever possible, practical difficulties may prevent investigations from being undertaken in certain cases. Consequently, the helpline staff will ask callers if they are willing to provide a contact name and number, although callers do not need to provide contact details.

Underpinning Legislation

Workers are protected by legislation, the Public Interest Disclosure Act 1998, which provides workers with the right not to suffer any detriment by the employer if they raise a concern (make a protected disclosure).

The Public Interest Disclosure Act 1998 identifies protected disclosure as that which the worker believes is in the public interest and is reasonably thought to show one or more of the following:

- 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 they are subject
- That a miscarriage of justice has occurred, is occurring or likely to occur
- That the health or safety risk of any individual has been, is being or is likely to be endangered
- 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 disclosures commits an offence by making it.

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. We strongly encourage you to seek advice before reporting a concern to anyone external.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier, service provider or hirer. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first.

Investigation and Outcome

Details of whistleblowing will be forwarded to the independently managed whistleblowing team who will act on it in the most appropriate way. Concerns will be reviewed and prioritised depending on the issue. Any resulting investigations will be made by people with appropriate authority who have the technical and professional knowledge required for the particular case. Serious issues will be investigated independently with the most serious investigated externally. You may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including staff from other companies in the Royal Mail Group, with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

Responsibilities

The Angard HR Business Partner has overall responsibility for this policy.

The independent whistleblowing team has responsibility for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Royal Mail Group Employee Confidential Disclosures (ECD) Committee has overall responsibility for Whistleblowing disclosures within the Royal Mail group, including within Angard. The ECD committee will: assess the status of disclosures under investigation; review prioritised Public Interest "Whistleblowing" disclosures; oversee reporting of disclosures to the Audit and Risk Committee; and, escalate matters (where required) of concern to Executive and non-Executive Directors of Royal Mail as appropriate.

Contacts

Speak Up (Whistleblowing)

To report a concern:

- Telephone InTouch MCS Ltd on 0800 0971 131 and choose to either speak to an operator or leave a voicemail message.

- Alternatively leave a message using the confidential on-line web based service using www.intouchfeedback.com/royalmail.

The following helplines may be of assistance for concerns that do not meet whistleblowing criteria set out in this policy.

Bullying & Harassment Helpline

A free helpline, operated by an independent company, to offer confidential advice relating to bullying or harassment concerns:

Telephone: 0800 5874777

Security Helpdesk

To report any information about a crime relating to Royal Mail Group or for advice regarding security:

Telephone 0207 239 6655

- Email securityhelpdesk@royalmail.com

Related documents

Angard Grievance Policy

Review

Angard will review this policy from time-to-time and may need to update it to meet new legal developments or changes in business need.