

# Whistleblowing Policy

Review date – March 2028

## Policy statement

The Postal Museum is committed to providing an open and transparent workplace culture where concerns can be raised and where staff who raise concerns are supported and treated fairly. Employees will be listened to, and concerns will be investigated.

Whistleblowing means raising issues that are in the public interest and could include unsafe working conditions, suspicions of fraud or a bullying culture across a whole team or organisation.

Whistleblowing in the workplace is dealt with under the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998.

The Whistle Blowing policy is to be used as a process in cases where internal policies are not applicable or in cases where they cannot be used.

The Postal Museum encourages staff to use internal mechanisms for reporting malpractice or illegal acts or omissions by employees or ex-employees. Please refer to the Grievance Policy to raise your concerns. When dealing with potential bullying, victimisation, all forms of harassment (including sexual harassment), please apply the Dignity at Work Policy. If there is a safeguarding situation about vulnerable adults or children, please see the Safeguarding Policy. All policies are published on Breathe. If you are unsure which policy applies, please speak to the People and Culture Team.

## 1. Definitions and scope

This policy applies to all staff including temporary, casual and agency staff, work experience, trainees and apprentices. Other individuals who work or have worked within the organisation, such as trustees, former staff, volunteers, the self-employed and contractors, are also encouraged to use it.

For the purpose of this policy, The Postal Museum recognises that whistleblowing is the passing on of information about wrongdoing at work. The whistleblower must reasonably believe that they are acting in the public interest.

The statutory categories for wrongdoing are:

- a criminal offence (such as insurance fraud or illegal tax evasion)
- a breach of any legal obligation
- a miscarriage of justice
- endangering an individual's health and safety
- damage to the environment
- deliberate concealment of information about any of the above.

Examples of wrongdoing might include (but are not restricted to):

- unsafe working conditions
- lack of, or poor, response to a reported safety incident
- inadequate induction or training for staff
- suspicions of fraud
- a bullying culture (across a team or organisation rather than individual instances of bullying).

Whistleblowing covers issues where reported concern is in the public interest, meaning it affects others beyond the individual making the report; personal grievances will not be classed as whistleblowing and should be dealt with according to The Postal Museum's usual grievance procedures.

It is not necessary for the person raising the issue to have proof that wrongdoing is being, has been, or is likely to be committed. A reasonable belief is sufficient to disclose the concern. The

member of staff has no responsibility for investigating the wrongdoing. It is the organisation's responsibility to ensure that an investigation takes place.

A person who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

The Postal Museum recognises that any so-called 'gagging' or confidentiality clauses in settlement agreements or non-disclosure agreements with individuals do not prevent members of staff from making disclosures in the public interest and are void in such circumstances.

If the wrongdoing that the person wants to disclose is not included in the list above, advice may be sought from the People and Culture team.

This policy will be reviewed annually from date of issue by the designated officer/s (see section 4 below) in conjunction with the Executive team. Where review is necessary due to legislative change, this will happen immediately.

## **2. Roles and Responsibilities**

The Executive team and Board of Trustees are responsible and accountable for this Whistleblowing Policy and Procedure. They will:

- demonstrate commitment to developing an open culture within the organisation, through actions and strategy
- receive and review annual reports on whistleblowing activity
- appoint designated officer/s

All staff have a duty to report wrongdoing (whistleblow) under the circumstances set out in section 1 of this policy.

Line managers are responsible for:

- ensuring all staff are aware of this policy and procedure and their responsibilities
- investigating issues raised promptly and thoroughly
- fostering an open culture within their teams
- ensuring any whistleblower is not subject to detriment
- escalating issues and engaging the support of designated officer/s where required.

Designated officer/s (see below) have lead responsibility for the whistleblowing procedure and for dealing with issues raised. They will:

- oversee and review the whistleblowing policy and procedure
- provide advice and support to managers and employees
- ensure learning from whistleblowing cases is fed back to the wider organisation
- ensure managers are trained in dealing with issues
- investigate issues raised with them directly promptly and thoroughly
- inform all reported disclosures to the responsible Board member and the actions being taken
- ensure the process is monitored and improved where required
- provide reports on whistleblowing activity on an annual basis to the senior management team and the Board.

## **3. Designated officers**

The following people are designated officers for concerns under this procedure

- The CEO, Laura Wright
- The Head of People and Culture, Natalia Arkhipova
- Curator (Collections Management), Stuart Aitken
- Venue Sales & Events Manager, Elizabeth Singleton

These designated officers will act as an independent and impartial source of advice to staff at any stage of raising a concern, with access to anyone in the organisation.

They will:

- treat the concern confidentially unless otherwise agreed
- ensure the person receives timely support to progress their concern
- escalate to senior management and the responsible Board member any indications that the person is being subjected to detriment for raising their concern
- if required, form an expert committee to deal with the case
- take responsibility for giving the person timely feedback on how their concern is being dealt with
- ensure the person complaining has access to personal support

If any designated officer has a conflict of interest in any whistleblowing concern, they will declare the conflict and may be excluded from taking part in any part of the process.

#### **4. How to raise a concern**

In many circumstances, the easiest way someone can get their concern resolved will be to raise it formally or informally with their line manager who should report it to a designated officer.

If this is not appropriate as the concern relates to the line manager, or if the person complaining does not have a line manager, or if the member of staff does not feel able to raise it with them or if raising it with their line manager does not resolve matters, the person can approach a designated officer directly. The designated officer will then confirm how the matter will be investigated.

Anybody who wants to raise a concern that is potentially of public interest, is encouraged to get legal advice where appropriate through the Employee Assistance Programme or through the charity Protect <https://protect-advice.org.uk/>

If, for any reason, the person complaining does not feel comfortable raising their concern internally, they can raise concerns externally with 'prescribed bodies' (see section 8 below) if they feel this is necessary and in the public interest.

Concerns should be raised in writing (including email). The letter should set out the background and history of the concerns, giving names, dates and places where possible, and the reason why the person is making the disclosure. If the individual does not feel able to make the disclosure in writing, an interview will be arranged.

When any meetings are arranged with an individual who is making or has made a protected disclosure, they have a right to be accompanied by a colleague or someone external to the organisation. The meeting can be off site if requested.

The person raising concerns does not have to prove the allegation, but they must demonstrate that there are sufficient grounds for concern.

If the person wants to raise the matter in confidence, they should please say at the outset so that appropriate arrangements can be made.

Confidentiality will be maintained as far as is possible. It is guaranteed at the point of making a protected disclosure and will be maintained throughout the investigation and hearings, other than when a disclosure of identity is needed due to cross examination of the person as a witness to any subsequent procedure or is required by law.

It is best to raise a concern openly, because that makes it easier for The Postal Museum to follow it up. The Postal Museum will not disclose the whistleblower's identity without their consent unless there are legal reasons that require them to do so. This might be, for example, where their information is about a child or vulnerable adult who is at risk, or where there is a possible criminal offence. If this is the case The Postal Museum may have to tell the police or another official body, or if required to do so by a court.

The Postal Museum will let the individual know if it has to do this and that this will identify them to another body.

Individuals may, if they wish, disclose information anonymously. However, it should be noted that in such circumstances, The Postal Museum will not be able to contact them to discuss their concern or ask them for further information, nor will they normally be able to give any feedback about any action taken. Any member of staff wishing to raise an anonymous complaint should do so using the [Whistleblowing Anonymous Form](#).

## **5. How The Postal Museum will respond**

Any concern raised under this policy will be investigated thoroughly, promptly and confidentially. Any approach to line managers and designated officers will be treated with the strictest confidence and the individual's identity will not be disclosed without their prior consent. All individuals will be treated with respect at all times.

There will be a meeting with the person raising the concern to ensure The Postal Museum understands exactly the particular concern.

When any meetings are arranged with an individual who has made a protected disclosure, they have a right to be accompanied. The meeting can be off site if requested.

When an individual makes a disclosure, the organisation will process any personal data collected as part of the investigation in line with The Postal Museum's data protection policy ensuring the data is stored securely and only accessed by those individuals essential for dealing with the disclosure.

As soon as possible, and anyway within 20 working days of a concern being raised, the line manager or designated officer who received the disclosure will write to the individual setting out the following:

- Acknowledgement that the concern has been received, the date it has been received, whether the person who raised the concern has requested confidentiality, and a summary of the concern
- Indicating how the matter will be dealt with and by whom and how they can be contacted
- Telling the person when an investigation has or is to be started and if further assistance will be needed from them.

The person who raises the concern will be told how long to expect the investigation to take and will be kept up to date with its progress.

The matters raised may be investigated internally. Where it has not been possible to resolve the matter quickly (usually within a few days) with the line manager, someone suitably independent (such as a designated officer) will carry out an investigation.

The investigation will be objective and evidence-based and will produce a report that focuses on identifying and rectifying any issues and learning lessons to prevent problems recurring. The investigator may decide that the concern would be better looked at under another process, such as the grievance procedure or dignity at work procedure. If so, this will be discussed with the individual.

In the event that misconduct is discovered as a result of any investigation under this policy, the disciplinary policy and procedure will be invoked in addition to any external measures.

On conclusion of any investigation, the person complaining will be told the outcome of the investigation and what The Postal Museum has done, or proposes to do, about it. Wherever possible, The Postal Museum will share the full investigation report with the person who raised the concern (while respecting the confidentiality of others). If no action is to be taken, the reason for this will be explained.

If an individual is not satisfied with the response received and any subsequent action taken, they should put their concerns in writing to the responsible Trustee who is Peter Walls at [peter.walls@postalmuseum.org](mailto:peter.walls@postalmuseum.org). He will arrange any further investigation as he thinks appropriate and will send a written response to the individual concerned.

More serious disclosures may be referred to an external prescribed person or body and may form the subject of an independent inquiry.

## **6. Harassment and victimisation**

The Postal Museum understands that raising a concern can be difficult. The Postal Museum will not tolerate harassment and victimisation of anyone raising a concern, and there should be no impact on the continued employment and opportunities for future promotion or training of anyone raising a concern. Any such behaviour is a serious breach of our values as an organisation and, if upheld following investigation, could result in disciplinary action potentially leading to dismissal.

Nor will The Postal Museum tolerate any attempt to bully anyone into not raising any such concern. Any such behaviour is a breach of our values as an organisation and, if upheld following investigation, could result in disciplinary action potentially leading to dismissal.

This policy encourages people to put their name to their concerns. Concerns expressed anonymously are harder to follow up and have an effective outcome.

If someone makes an allegation in good faith, but the allegation is not confirmed by the investigation, no action will be taken against that person. They will not be at risk of losing their job or suffering any form of reprisal as a result. Provided the person is acting honestly, it does not matter if they are mistaken or if there is an innocent explanation for their concerns.

## **7. Bad Faith or Malicious Disclosures**

Any disclosure made by anyone in the organisation in bad faith or maliciously will not be tolerated and could lead to disciplinary action. Such disclosures undermine the whole tenet of a whistleblowing policy.

## **8. Reporting a concern to an external body**

This policy is intended to provide a route by which members of staff or others can raise concerns internally. However, if they are unhappy with the outcome of an investigation or if, for any reason they do not feel comfortable raising their concern internally, they are free to take the matter outside of the organisation to a prescribed person or body or to their Member of Parliament (MP).

The full list of prescribed persons and bodies can be found on the UK government website at [www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies-2/whistleblowing-list-of-prescribed-people-and-bodies](https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies-2/whistleblowing-list-of-prescribed-people-and-bodies).

They include:

- HM Revenue & Customs
- the Comptroller and Auditor General
- the Director of the Serious Fraud Office
- the Charity Commission for England and Wales
- the Information Commissioner
- the Equality and Human Rights Commission
- the Health and Safety Executive
- the Care Quality Commission
- the Environment Agency.

## **9. More information and support**

Protect is the UK's whistleblowing charity that aims to stop harm by encouraging safe whistleblowing. They provide a legal advice service offering free expert and confidential advice on how best to raise a concern and protection as whistleblower. <https://protect-advice.org.uk>

Protect Advice Line: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)

Protect Advice Line: 020 3117 2520 (\* option 1)

UK government advice on 'Whistleblowing for employees'  
[www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing)

Acas guidance on 'Whistle-blowing – Public Interest Disclosure'  
<https://archive.acas.org.uk/index.aspx?articleid=1919>

Confidential support is available for individual employees from the employee assistance programme and this may include counselling if appropriate, in addition to practical information and advice.