

SPEAKING UP ABOUT MALPRACTICE OR MISCONDUCT

Introduction

When things are going wrong in an organisation the signs are usually there for everyone to see. Usually they are spotted, reported up the management chain and acted upon.

But sometimes they are not. Management may not listen. Staff may not feel confident enough to raise a concern. They may see management as the problem. But when the concern is serious – disregard of Bank policies and codes, a risk to the Bank, a possible fraud, malpractice or misconduct or something that if unchecked would be damaging to the Bank – then it is more than ever vital that you

Speak Up!

The Bank needs you to raise any concern you have, at an early stage and in the right way. You don't have to come with proof. You need only tell us that something needs to be looked into. We do the rest.

Our assurances to you

To those who **Speak Up**, we undertake

- You will not lose your job or suffer any other penalty. It doesn't matter if you are mistaken. We do not tolerate any victimisation or harassment of those who **Speak Up**.
- If you ask us to protect your identity we will do so unless required to do otherwise by law. If it becomes impossible to investigate without disclosing your identity we will discuss this with you before taking the issue further.

How to Speak Up

- First, if you can, go to your manager.
- If you feel unable to do that, for whatever reason, or feel that they have not dealt with the matter appropriately, please raise the matter with one of the following:

Secretary of the Bank
Staff Counsellor
Deputy Secretaries of the Bank
Executive Director, HR
Enforcement & Litigation Division

Unite union members may also contact Unite (Seconded Rep)

These people have been given special responsibility for dealing with the type of concerns that might be raised under this policy.

- Alternatively, or if you feel that your concern is not being treated appropriately, you may contact the Governor or Chair of the Bank's Audit & Risk Committee.
- If you feel unable to raise the issue with any of the above, you can raise a concern externally via a helpline provided by *Right Management*.

If you want to raise the matter in confidence, please say so at the outset so that appropriate arrangements can be made.

Please note that **Speak Up** is not for concerns about your own employment, or how you have been treated by your manager. That is for the Bank's grievance procedures

What happens next

Once you have told us of your concern, we will appoint an independent investigator – for example the Head of Internal Audit, or (if appropriate) an external specialist. The Staff Counsellor will be briefed on the issue raised and the method for handling it. The Staff Counsellor can advise and can raise the matter to higher levels of management if he/she is concerned about how the issue is being handled.

The process may involve an informal review, an internal inquiry or a more formal investigation. We will tell you who will be handling the matter, how you can contact them, and what further assistance we may need from you. If you ask, we will write to you summarising your concern and setting out how we propose to handle it.

If the complaint relates to another employee, they will, unless there is a risk of prejudicing any review, enquiry or investigation, be made fully aware of the nature of the complaint and be given an opportunity to respond: if they choose, they may be accompanied at any relevant meeting.

When you raise the concern it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls more properly within our grievance, anti-harassment/bullying or other relevant policy, we will let you know.

Whenever possible, we will give you feedback on the outcome of any investigation. Please note, however, that we may not be able to tell you about the precise actions we take where this would infringe a duty of confidence we owe to another person.

While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly. By using this policy you will help us to achieve this.

Monitoring and oversight

The Secretary of the Bank is responsible for this policy, ensuring it is both accessible and up to date. He will also review the policy annually and will report regularly to the Audit & Risk Committee of Court.

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