

Whistleblowing Policy

Introduction

Co-operatives UK takes whistleblowing seriously and wants to encourage a trusting and supportive environment for our colleagues and anyone working for us. As part of this, we want to ensure that colleagues feel able to speak up when they suspect wrongdoing (whistleblowing).

Whistleblowing Concerns

The specific concerns that count as whistleblowing are set out within the Public Interest Disclosure Act 1998 and relate to following acts:

- the commission of a criminal offence;
- a failure to comply with a legal obligation;
- a miscarriage of justice;
- a risk to the health and safety of an individual;
- damage to the environment; or
- an attempt to cover up any of the above.

Protection For Whistleblowers

A colleague who raises a whistleblowing concern has the right not to be subjected to any detriment for having done so provided that there is the reasonable belief that one of the above activities is taking place.

- If a colleague believes they are being subjected to a detriment as a result of any concerns they raise under this policy, they should inform the Whistleblowing Officer at whistleblowing.uk.coop or contact the whistleblowing hotline on 0161 214 1799 and appropriate action will be taken.
- If any person tries to discourage a colleague from coming forward to express a concern, or subjects them to detriment for raising a concern, disciplinary action under Co-operative UK's Disciplinary Procedure may be taken against that individual.

Confidentiality and Anonymity

We want colleagues to feel comfortable about raising whistleblowing concerns. If we are asked to treat the concern confidentially, we will not disclose the colleague's identity without consent, unless it is necessary in order to further investigate or if we are required to do so by law.

There may be matters that cannot be dealt with internally and external authorities will need to become involved. Where this is the case, we reserve the right to make such a referral without the colleague's consent.

False or Malicious Allegations

In making a disclosure the colleague should exercise due care to ensure the accuracy of the information. Where a concern is raised under the whistleblowing procedure in good faith, but which is not confirmed or supported by subsequent investigation, no action will be taken against the colleague raising the concern.

If, however, a colleague raises a concern which is knowingly false or malicious, the colleague raising the concern may be subject to formal disciplinary action under Co-operative UK's Disciplinary Procedure.

Colleague Grievances

A grievance is a complaint relating to you directly as an employee such as, for example, how you are being treated by Co-operatives UK or a colleague or colleagues. Colleague grievances should be raised using Co-operatives UK's Grievance Procedure. You can also contact HR for further advice.

Concerns relating to our Members

Co-operatives UK is a trade association for co-operatives which provides a range of services and support to our members. We do not have regulatory role and are unable to get involved in the running of our member organisations.

Our Whistleblowing Policy relates to employees of Co-operatives UK and anyone working for us. If your concern relates to one of our members, this does not constitute whistleblowing and should be raised with that member either as a complaint or via the member's own procedures. Please note that many member organisations will have their own procedures through which you can raise your concern.

You may raise it with Co-operatives UK who may decide to approach a member if we receive complaints or questions about their operations. Depending on the nature of a concern regarding a member, we may be able to signpost you to another organisation or agency who can provide support.

If you have a concern relating to a member, you may be able to find support at one of the following:

FCA Mutuals Registry - <https://www.fca.org.uk/firms/your-membership/report-concern-mutual-societies>

Housing Ombudsman - info@housing-ombudsman.org.uk, 0113 111 3000

Ofgem (the energy regulator) <https://www.ofgem.gov.uk/about-us/contact-us>

Citizens Advice - [0808 223 1133](tel:08082231133), <https://www.citizensadvice.org.uk/about-us/contact-us/contact-us/web-chat-service/>

Advice Scotland - [0808 196 8660](tel:08081968660), <https://energyadvice.scot/>

Policy Owner

The owner of this policy is the Whistleblowing Officer, Claire Dalton, Society Secretary, who is responsible for reviewing the policy at every three years from date of last approved version. A confidential log of all concerns raised will be kept by the Whistleblowing Officer and anyone involved in any concern raised will retain all relevant correspondence until after the completion of an investigation and all escalation routes have been exhausted, and the outcome of any investigation has been reported to the person who raised the concern.

Whistleblowing Procedure

1. Inform your Line Manager

Where appropriate, colleagues should raise concerns with their line manager in the first instance so that they can try to resolve the issue. There is no set procedure for doing this – the problem can be raised verbally or put in writing if preferred.

2. If you feel unable to inform your Line Manager

If you feel you cannot tell your line manager, or the concern involves them, you should approach a member of the Leadership Team (LT).

If a manager receives a whistleblowing complaint it is important to deal with it as soon as possible. Depending on its nature, there may be a legal timescale involved in resolving it.

3. If you still have concerns or feel unable to follow steps 1 and 2 above

If you feel unable to raise your concerns in the ways set out in 1 and 2 above, in some way, you can follow the procedure below to raise directly to the Whistleblowing Officer. You should email your concerns to whistleblowing@uk.coop with 'WHISTLEBLOWING' included in the email title, or complete the Whistleblowing form here. The Whistleblowing Officer, will contact you to acknowledge receipt of your concerns and give guidance on next steps.

Alternatively you can contact the whistleblowing hotline on 0161 214 1799

To help ensure your concerns are addressed as soon as possible please provide as much information as possible as missing or inaccurate information can lead to a delay. If you are able to, please supply the following information:

- your full name and department
- date that the concern is raised
- a summary of your concerns
- details of any witnesses or supporting evidence
- details of any steps you have taken to resolve this matter informally.

You may raise concerns anonymously, but this may make the investigation more difficult or time consuming to carry out.

What happens next

We'll always act on any whistleblowing reports as soon as is practically possible. In normal circumstances, you can expect your concern to be acknowledged within five working days of receipt and to receive a response to it within 21 working days.

Depending on the nature of the concerns raised, your concerns may be escalated by the Whistleblowing Officer ("WBO") to another member of the Co-operatives UK Leadership Team.

A decision will then be taken on how to respond in the appropriate manner. This will usually involve making internal enquiries in the first instance.

An investigation may then be arranged into the concern raised, and the WBO will appoint an appropriate person to undertake the investigation. This may be any member of the Leadership Team or another appropriate manager such as the HR Manager – they will be named the Investigating Officer.

The investigation may involve gathering statements from individuals involved. Any investigation will be carried out in accordance with the Policy set out above.

The Investigating Officer will then report to the Leadership Team, which will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency.

On conclusion of any investigation, the colleague who raised concerns will be informed, as far as possible, of the decisions taken and outcome of the investigation and what Co-operatives UK has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained as far as possible. We will not however be able to disclose any matters that would compromise our duty of confidentiality to others.

Co-operatives UK Whistleblowing Investigation Process – Guidance for Investigators

- The colleague must not be treated differently because they have spoken up. If this happens it could be investigated and may lead to disciplinary action.
- If the allegations were made anonymously, a thorough investigation should be carried out but no attempt should be made to identify the whistleblower
- If the allegation was not made anonymously, you must not reveal the whistleblower's identity without their consent:
 - The nature of the investigation may mean you need to contact the individual for information (if not raised anonymously)
 - You should ask the whistleblower if they want to remain anonymous, and if this is so, confirm to them that their identity will not be shared
 - Reassure the whistleblower that they will not be treated differently for speaking up.
 - Consider who else you need to speak to in order to conduct the investigation, for example:
 - Financial impropriety – contact the Head of Finance
 - Health and Safety – contact the Facilities Manager
 - IT use/data security – contact the Digital and IT Manager

Timescales

- The investigation should be carried out as quickly as possible, whilst ensuring to be thorough
- Inform the colleague who raised the concerns if the investigation is taking longer than envisaged
- Keep the colleague who raised the concerns informed on progress of the investigation
- If the matter is of a very serious nature and you are unsure how to proceed, speak with the WBO.

Investigation Outcomes

There are likely to be different outcomes depending on the nature of the complaint and investigation, and as a result of the findings of the investigation.

In all cases, on completion of the investigation, the outcome must be provided to the WBO to be logged for reporting purposes. Reporting is provided in an anonymised format to Co-operatives UK's Audit and Risk Committee.

If nothing is found to support the colleague's concern, or you find evidence to suggest it isn't true, you should inform the colleague that an investigation has taken place and there is no information to support their concern (remember; a whistleblower's complaint does not have to turn out to be true; there simply has to be a reasonable belief that it was true when they raised it).

If evidence is found to support the colleague's concern, necessary steps should be taken to resolve the matter. If it is found that other colleagues are accountable, HR should be contacted for advice. An independent manager will need to carry out an investigation into their conduct.

If the colleague who raised the concern asks for feedback, thank the colleague for speaking up and reassure them that it has been taken seriously and investigated. Inform the colleague that actions are being taken to address the issues raised but **do not** inform them about any action taken against other colleagues as this is confidential.

Record Keeping

Once the whistleblowing case is concluded, any paperwork should be retained in a secure location, for a period of six years in case it needs to be referred to. Speak with the WBO about this.

Reviewed by the Co-operatives UK Audit and Risk Committee: July 2023

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