

Co-op Whistleblowing Investigation Process -

Guidance for Investigating Managers

At the Co-op we take whistleblowing very seriously and are committed to investigating any allegations raised. It's important that whistleblowing investigations begin as quickly as possible and should always be **investigated by a colleague who is independent** to the issue raised.

Interaction with whistleblowers:

If you are asked to investigate a whistleblowing case:

- **You must not treat the colleague differently** because they have spoken up. If you do, you may be investigated, and which could lead to disciplinary action against you.
- **If the allegations were made anonymously**, a thorough investigation should be undertaken but no attempts should be made to try and identify the whistleblower.
- **If the complaint wasn't anonymous**, do not divulge their identity without consent. The investigation may involve contacting the colleague who raised the concern to gather more information. You should ask them if they want their identity kept confidential and if so, confirm that you won't share their details without their consent. Reassure them that they won't experience any bad treatment at work for speaking up.

Seeking assistance with investigations:

You should then consider **who else you need to speak to**, depending on the nature of the whistleblowing concern. For example:

- if the concern is about health and safety speak to the Health and Safety team;
- if it's about financial irregularities speak to your Finance Partner; or
- if it's about a potential criminal matter speak to the Risk team

When a concern is about the conduct of another colleague, get advice from [ER Services](#) before you speak to that colleague. If unsure, contact the [Internal Audit](#) team for advice on whistleblowing@coop.co.uk.

Timescales for investigation:

There's no set timescale for investigating a whistleblowing complaint, as each situation will be different - but 21 days is a guideline. You should carry out your investigation as quickly as possible, while making sure you investigate things thoroughly. **Please keep the [Internal Audit](#) team up to date on the progress of your investigation.**

Investigation outcomes:

For all cases - on completion of the investigation – please **provide the outcome to the whistleblowing contacts in [Internal Audit](#)**. And propose the necessary steps to resolve the matter.

- **If you don't find anything to support the colleague's concern**, or you find evidence to suggest that it isn't true, you should inform the colleague that the matter has been investigated and there's no information to support their concern. Remember that a colleague's whistleblowing complaint doesn't have to turn out to be true. They just need to reasonably believe that it was true when they raised it.
- **If you do find evidence to support their concern**, you should take the necessary steps to resolve the matter. If you find that individual colleagues are accountable, then you should contact [ER Services](#) for advice. An independent manager will need to carry out a disciplinary investigation into their conduct.

If **the colleague who made the allegations requests feedback**, thank the colleague for speaking up about their concerns and reassure them that things have been taken seriously and thoroughly investigated. Inform the colleague that you have investigated the matter and actions are being taken to address the issues raised – but you shouldn't tell them about any action that may be taken against other people, as this is confidential.

Investigation records

Once the whistleblowing case has been dealt with, **it's important that you keep all the paperwork for 6 years** in case it needs to be referred to. You should keep these in a secure place, and they should remain confidential unless you are asked for them by a member of the Internal Audit or Legal teams.