



Whistleblowing Policy

Policy Summary

Purpose

Southern Co-op wants to encourage a trusting and supportive environment for all our colleagues, members and wider stakeholders.

We take malpractice or misconduct seriously and all colleagues, franchisees and those delivering goods and services to us, or on our behalf, are expected to act with honesty and integrity in all they do. Sadly, a minority of individuals may not do so.

We're committed to a culture of openness, trust and respect and encourage the reporting of legitimate concerns. This policy sets out assurances that any matter raised under this policy will be investigated thoroughly, promptly and confidentially, and where contact details are known, the outcome of the investigation will be reported back to the person who raised the concern.

We want people to feel empowered to speak out in confidence if they have concerns, with the assurance that they'll be protected from possible reprisals or victimisation where they report wrongdoing in good faith.

Reporting concerns helps us to:

- act quickly against any wrong doing,
- maintain our high standards of honesty and integrity,
- identify risks that we may not know about, and put measures in place to manage them.

Scope

This policy extends to Southern Co-op and all its subsidiary companies. If a colleague discovers, or genuinely and legitimately believes that a breach of policy or a criminal activity is being committed, is being planned, or has occurred, they have a duty and responsibility to report it and our Whistleblowing Procedure allows them to do so.

We also invite our members, customers, suppliers and other stakeholders to report such matters via our Whistleblowing Procedure, where they have been evidenced.

Policy Detail

Southern Co-op's Whistleblowing Policy applies to the raising of concerns relating to wrong doing, risk or malpractice in respect of Southern Co-op's activities that a colleague witnesses in the workplace. Examples of the types of matters, which it would be appropriate to raise under the procedures set out in this policy, are:

- bribery or corruption, money laundering or terrorist financing
- theft or fraud
- financial irregularities
- dangerous acts or omissions which create a risk to health, safety or the environment
- instances of modern slavery
- other criminal activities
- failure to comply with any other legal obligation
- deliberately concealing information with regard to any of the above matters



The procedure is not to be used for raising grievances with regard to personal situations, whether this be employment related, or connected to another contractual relationship with Southern Co-op. If there is a complaint to make about your own employment (e.g. treatment at work bullying, harassment, discrimination), or in relation to a business relationship, this should be raised through existing channels:

- colleagues via the Southern Co-op Grievance Procedure
- members/customers via Member Support and Customer Services team
- business relationships via the complaints process set out in your contract.

Confidentiality and Protection

Southern Co-op will ensure that all concerns raised will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however we may ask you to come forward as a witness. However, this policy encourages you to provide your name and contact details wherever possible. If you do not do this, we are unable to go back to you for further information, which can make investigating the concerns that were raised difficult. Where we are required to involve external authorities in an investigation, we may be required to disclose your details.

The Public Interest Disclosure Act 1998 is aimed at helping colleagues to speak out about any perceived malpractice within the workplace which have a public interest. Southern Co-op will ensure that this is applied in all cases and commits that no colleague who makes a report under this policy will be subjected to any detriment as a result. In the event that a colleague believes they are being subjected to a detriment by any other person within Southern Co-op as a result of a report of wrongdoing, they should report this via the Whistleblowing Procedure in order that appropriate action can be taken to protect them.

Any colleague who tries to discourage another colleague from expressing a concern, or victimises them after a concern has been raised, may be subject to disciplinary action.

These principles will also be applied to any other stakeholder raising a genuine and legitimate breach of policy or criminal activity under this policy.

Use and Misuse of Policy

This procedure has been developed to provide a channel and process for colleagues to raise genuine and legitimate concerns and for Southern Co-op to have the opportunity to investigate those concerns and take appropriate action.

Colleagues who use the procedure to bring unsubstantiated malicious and/or false complaints will, where appropriate, be subject to disciplinary action. Colleagues should take care to ensure accuracy of the information they report.

Provided a colleague makes a report in good faith, and genuinely and reasonably believes that the information provided and allegations made are substantially true they will not be subject to disciplinary action, nor be subjected to any other detriment, or be victimised in any way for raising the concern.



Procedure

How to raise your concern

If you are unsure whether to use this procedure, or want independent advice at any stage, Southern Co-op recommends that you contact the independent charity [Protect](https://protect-advice.org.uk) on 020 3117 2520 or via their website <https://protect-advice.org.uk>.

Internal Line Management (for Colleagues)

Colleagues should, in the first instance, contact their manager, or if this is not possible, contact another appropriate manager. This may be done in person, by telephone, email or letter. If a report is made in person or by phone, you may be asked to confirm the details in writing.

Most concerns that are raised can quickly be resolved, by line management, through either a telephone call or email, however if you feel your complaint has not been resolved to your satisfaction you may escalate it within a reasonable timeframe using the Whistleblowing Report Form (see below).

Alternative Method of Reporting (for Colleagues and Other Stakeholders)

Via Whistleblowing Report Form

If a colleague feels unable to raise the matter with someone in their immediate line management, for whatever reason, they may report a concern via Southern Co-op's Whistleblowing Report Form.

Other stakeholders, including customers and suppliers, wishing to raise a concern under this policy may also do so via Southern Co-op's Whistleblowing Report Form.

The Whistleblowing Report Form is available on our website (<https://southern.coop/>). The form, when completed via our website will automatically be sent to our Legal Team. Alternatively, the form may be downloaded, completed and posted to the Society Secretary.

By Telephone

For those unable to utilise the Whistleblowing Report Form, you may contact the Society Secretary via 02392 222500.

All matters reported will be investigated, with a record of the allegation, investigation and outcome kept. Information on matters reported under our Whistleblowing Procedure will be reported to our Board and Leadership Team, however this will be in anonymised form.

Where a person making a report provides contact details they will receive confirmation of receipt of the report. Additional information or clarification may be sought where this would improve any investigation. Upon completion of the investigation the outcome will be advised.

Where contact details are not provided, an investigation will still be completed however we will not be able to seek further information nor notify the outcome.

Responsible (R)	Risk and Compliance	Accountable (A)	Legal
Consult (C)	Colleague Relations and Wellbeing	Inform (I)	Central Ops & Stores, ELS, Cobra Coffee, Lakeside
Date	18/07/24	Version	2.2
Job Role Approval	Society Secretary and Board Audit and Risk Committee		