



**WHISTLEBLOWING POLICY AND PROCEDURE**

**JANUARY 2024**

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## 1. PURPOSE

- 1.1 The Group is committed to conducting its business with honesty, openness and integrity and, therefore, takes seriously any form of malpractice, fraud and/or abuse within the workplace. In order to maintain high standards it is essential that everyone working for the Group feels able to raise any concerns they may have about how business is conducted.
- 1.2 Whistleblowing is the reporting of suspected malpractice, wrongdoing or dangers in relation to the Group's activities, within its organisation or within an independent structure associated with it.

## 2. SCOPE

- 2.1 This is a group level policy that applies to all workers of Anglian Water Group Limited and its subsidiaries (the "Group"), with the exception of Anglian Water (Ireland) Limited and Wave Limited (and their respective subsidiaries which include Celtic Anglian Water and Anglian Water Business (National)).

Where a worker is defined as any person working for the Group, including temporary/casual employees, agency staff, contractors, trainees and volunteers.

- 2.2 All workers have protection from victimisation or harassment under whistleblowing laws [The Public Interest Disclosure Act (PIDA) 1998] if they raise concerns in the correct way. This policy and procedure gives workers the opportunity and protection to raise a concern about any aspect of the Group's work that adversely affects other workers, the organisation and/or the public, in confidence and without fear of reprisals. Where an individual wishes to make a complaint about something relating to their own employment, this should be raised and resolved under Anglian Water's Grievance Policy & Procedure, which is available on [Lighthouse](#).

## 3. QUALIFYING DISCLOSURE

- 3.1 The Whistleblowing Policy and Procedure should be used when an individual wishes to raise a genuine concern, past, present or future on one of the following matters relating to the Group:
- a criminal offence (e.g. bribery);
  - a failure to comply with any legal obligations (e.g. breach of competition rules, infringing someone's intellectual property rights, breach of contract);

- a miscarriage of justice;
- danger to the health and safety of an individual or the public;
- damage to the environment; and/or
- the deliberate concealment of information relating to any of the above.

3.2 It does not matter if an individual who raises a concern is mistaken about it; workers do not have to prove anything about the allegation they are making. However, they must reasonably believe that the disclosure is made in the public interest and that the information they have indicates some malpractice.

3.3 There are two types of disclosure, Internal and External:

- Internal disclosures to the employer or another responsible person in the Group (e.g. if the person who is making the disclosure is an agency worker); and
- External disclosures to prescribed persons such as regulatory bodies, the police or MPs.

3.4 Each of these disclosures is explained in [Section 7](#) below. It is important that workers understand that there are more conditions that have to be met by the worker if they make external disclosures (and still have protection under the PIDA legislation). Therefore, the easiest way in which a worker can make a protected disclosure is to make it to his or her own employer (or the other responsible person). **Wherever possible, internal disclosure should be used.**

#### 4. STATUS

4.1 This policy and procedure are subject to regular review by the Group and are updated as appropriate. Amendments to the policy are approved by the AWS and AWG Audit Committees.

#### 5. POLICY OWNER

5.1 Head of Employee Relations.

#### 6. POLICY

6.1 The Group will support all workers where the disclosure is made with reasonable belief that it is in the public interest, the procedures are followed and where there is a reasonable belief that the information is substantially true.

6.2 No individual will be punished or subjected to any detrimental treatment or victimisation. Any harassment or victimisation on such grounds may lead to disciplinary

action against the perpetrator. In the event that the individual believes that they are being victimised, they should raise their concerns as soon as possible with the person to whom they made the disclosure or to the Head of Employee Relations.

- 6.3 Our independent Employee Assistance helpline is a confidential service available 24 hours a day, 7 days a week. They provide health and wellbeing support for employees during their employment, including any whistleblowing disclosure. They can be contacted on freephone **01480 323323 (option 4)**.

This is separate from the Whistleblowing line, which is managed by an independent provider. Workers can raise a concern in a number of ways:

- By calling 0800 988 3868
- By emailing [report@seehearspeakup.co.uk](mailto:report@seehearspeakup.co.uk)
- Or by using the following link: <https://www.seehearspeakup.co.uk/en/file-a-concern>
  - Username: Anglian
  - Password: Awaters89

## 7. PROCEDURE – INTERNAL DISCLOSURE

- 7.1 If an individual is concerned about any form of malpractice covered by this policy, the individual should raise the issue with their immediate superior. However, if an individual feels they cannot tell their immediate superior, for whatever reason, they should raise the issue through the whistleblowing facility for escalation to a designated person, i.e. Chief Financial Officer, People Director, Head of Internal Audit and/or Legal Director.
- 7.2 A concern can be raised by telephone, in person or in writing (either by email or through the dedicated web facility). Where a concern is made in writing the Group has a form to use for this purpose – see [Appendix 1](#). Although the individual is not expected to prove the truth of their concern beyond doubt or to provide evidence, generally the individual will need to provide the following information as a minimum:
- the nature of the concern and why the individual believes it to be true; and
  - the background and history of the concern (giving relevant dates where possible).
- 7.3 The Group is committed to ensuring that disclosures are dealt with appropriately, consistently, fairly and professionally. An appropriate person, with the necessary level of skills and expertise will be appointed to investigate the issue(s) raised. This appointment will be confirmed to the individual raising the concern (where contact details have been provided) within 10 working days.
- 7.4 The Investigating Manager will arrange a meeting as soon possible to discuss the concern raised. The individual may bring a colleague or trade union representative to

any meeting that takes place. The companion must respect the confidentiality of the disclosure and any subsequent investigation. The individual may be asked for further information about the concern raised, either at this meeting or at a later stage.

- 7.5 After the meeting, the Group will decide how to respond. Usually, this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. External investigators may be brought in where necessary. The Group will endeavour to complete investigations within a reasonable time.
- 7.6 The individual who raised the concern will be kept informed of the progress of the investigation carried out and when it is completed, and give an indication of timings for any actions or next steps that will be taken, but the Group will not be able to inform the individual of any matters which would infringe any duty of confidentiality owed to others.
- 7.7 Where a concern relates to a member of the Management Board and / or an individual who routinely investigates allegations, such as the Head of Employee Relations or the Head of Internal Audit, concerns can be raised directly with the Group's Chair. In this scenario workers can raise a concern by emailing:  
[whistleblowing\\_chair@anglianwater.co.uk](mailto:whistleblowing_chair@anglianwater.co.uk) .

## 8. PROCEDURE – EXTERNAL DISCLOSURE

- 8.1 The main purpose of this policy is to give all our workers the opportunity and protection they need to raise concerns internally. The Group would expect that in almost all cases raising concerns internally would be the most appropriate course of action and strongly encourages any individual to seek appropriate advice before reporting a concern to anyone external.
- 8.2 If for whatever reason, an individual feels they cannot raise their concerns internally and they reasonably believe that the information and any allegations are substantially true, the law recognises that it may be appropriate for them to raise the matter with another prescribed person, such as a regulator or professional body or an MP. A list of the relevant prescribed people and bodies for this purpose and the areas for which they are responsible is available from:
- **Protect** (*formerly Public Concern at Work*) - a leading independent charity whose main objectives are to promote compliance with the law and good practice in the public, private and voluntary sectors. Information and advice can be found at <https://www.protect-advice.org.uk>. It also provides a free helpline offering confidential advice on **020 3117 2520**.

and

- the **GOV.UK** website at <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2> or [www.gov.uk/whistleblowing/howtowhistleblow](http://www.gov.uk/whistleblowing/howtowhistleblow)

8.3 Some of the most relevant external bodies are listed in [Appendix 2](#).

## 9. CONFIDENTIALITY

9.1 Any concern raised in accordance with this Policy, shall be treated with the utmost confidence and it shall be discussed only between the appropriate person and the individual(s) who are selected to investigate the matter.

9.2 All workers will be encouraged to disclose their name when making a qualified disclosure under this Policy, as the purpose is to promote openness and accountability and to discourage a fear of reprisals. Every effort will be made not to reveal the identity of an individual who raises a concern if that is their wish. However, it is inevitable that in certain circumstances, e.g. if disciplinary or other proceedings follow the investigation, that in order to investigate the matter properly and effectively, the source of the information may have to be revealed and the individual may be asked to come forward as a witness. Should this be the case, the individual will be told prior to their name being disclosed and they will be offered advice and support.

9.3 Concerns that are expressed completely anonymously are more difficult to investigate. The Group will consider them at its discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources.

9.4 This Policy does not affect the duty of confidentiality that a worker owes to their employing company. If a disclosure is made to a Prescribed Person under the provisions of the Act and in accordance with this Policy, or to a legal adviser, the duty of confidentiality will not be breached. However, the Group encourages employees to try to resolve their concern(s) internally in the first instance, wherever possible, as this is the aim of this policy and is encouraged by the Act.

## 10. PROTECTION AND SUPPORT

10.1 The Group is committed to good practice and high standards and to being supportive to workers who raise genuine concerns under this policy, even if they turn out to be mistaken.

- 10.2 Any individual raising a genuine concern must not suffer any detriment as a result of doing so. If an individual believes that they have suffered such treatment, they should contact the Group's Whistleblowing helpline. If the matter is not dealt with to the individual's satisfaction, the individual should raise it formally using the Anglian Water Grievance Policy & Procedure (available on [Lighthouse](#)).
- 10.3 No worker must threaten or retaliate against an individual who has raised a concern and the Group will not tolerate any such harassment or victimisation. Any person involved in such conduct may be subject to disciplinary action.
- 10.4 To ensure the protection of all our workers, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or made in the public interest may be liable to disciplinary action.

## 11. RECORDS

- 11.1 It is the Group's standard practice that all written correspondence will be sent by email. Where this is not possible (i.e. the worker does not have a work email account), it will be sent by standard mail.

## 12. FURTHER ASSISTANCE

Please contact your Employee Relations Manager for further assistance. Details of the areas covered by each Employee Relations Manager can be accessed [here](#).

## LAST REVIEWED AND APPROVED BY THE BOARD

January 2024



**APPENDIX 1 – NOTIFICATION OF WHISTLEBLOWING ALLEGATION FORM**

|  |  |
|--|--|
| <p><b>Who is involved?</b></p> <p>Internal - <i>name, position, location</i></p> <p>External - <i>name, position, location</i></p> |  |
| <p><b>What is it they have been doing?</b></p>   |  |
| <p><b>How did they do it?</b></p>  |  |
| <p><b>When did they do it?</b></p>   |  |
| <p><b>Where did this take place?</b></p>   |  |
| <p><b>Give examples of actual occurrences</b></p> <p>Places<br/>Contracts<br/>Times/Dates</p>                                      |  |
| <p><b>Do you know why they have done this?</b></p>   |  |

|   |  |
|---|--|
| <b>How long do you think this has been going on?</b>  |  |
| <b>What value of money is involved?</b>   |  |
| <b>How did you become aware of this?</b>  |  |
| <b>Who have you told?</b>   |  |
| <b>Who else knows? How did they become aware?</b>   |  |
| <b>What evidence do you have?</b>   |  |
| <b>Your name, position and contact number details (if you wish to disclose this information):</b> |  |

## APPENDIX 2 – EXTERNAL CONTACTS

### **The Director of the Serious Fraud Office**

Contact them about serious or complex fraud, including bribery and corruption, in England, Wales or Northern Ireland and civil recovery of the proceeds of unlawful conduct.

The Director of the Serious Fraud Office  
2-4 Cockspur Street  
London  
SW1Y 5BS

Website: [www.sfo.gov.uk/contact-us/reporting-serious-fraud-bribery-corruption](http://www.sfo.gov.uk/contact-us/reporting-serious-fraud-bribery-corruption)

### **Competition and Markets Authority**

Contact them about matters concerning the sale of goods or the supply of services, which adversely affect the interests of consumers; competition affecting markets in the UK.

Competition and Markets Authority  
The Cabot, 25 Cabot Square  
London E14 4QZ  
Tel: 020 3738 6000  
Email: [general.enquiries@cma.gov.uk](mailto:general.enquiries@cma.gov.uk)

### **Commissioners for Her Majesty’s Revenue and Customs (HMRC)**

Contact them about:

- the administration of UK taxes
- the administration of national insurance and tax credits systems
- customs and border-related functions
- criminal investigations

Tel: 0800 788 887 (you cannot currently make a report by post)

Website: [www.gov.uk/government/organisations/hm-revenue-customs/contact/reporting-tax-evasion](http://www.gov.uk/government/organisations/hm-revenue-customs/contact/reporting-tax-evasion)

**The Information Commissioner**

Contact them about compliance with the requirement of legislation relating to data protection and to freedom of information.

The Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF  
Tel: 0303 123 1113  
Website: [www.ico.org.uk](http://www.ico.org.uk)

**The Environment Agency**

Contact them about acts and omissions which have an actual or potential effect on the environment or the management or regulation of the environment. This includes those relating to pollution, abstraction of water, flooding, the flow in rivers, inland fisheries and migratory salmon or trout.

National Customer Contact Centre  
PO Box 544  
Rotherham  
S60 1BY  
Tel: 03708 506 506  
Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)  
Website: [www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

**The Health and Safety Executive**

Contact them about:

- the industries and work activities for which the Health and Safety Executive is the enforcing authority under the Health and Safety (Enforcing Authority) Regulations 1998
- the health and safety of individuals at work, or the health and safety of the public arising out of or in connection with the activities of persons at work

Tel: 0300 003 1647  
Online form: <https://www.hse.gov.uk/contact/tell-us-about-a-health-and-safety-issue.htm>

**The Pensions Regulator**

Contact them about matters relating to:

- the protection of members' benefits under work-based pension schemes
- the administration and governance of such schemes (this includes matters relating to automatic enrolment under the Pensions Act 2008)

Customer Support

The Pensions Regulator

Telecom House

125-135 Preston Road

Brighton BN1 6AF

Tel: 0345 600 0707

Email: [report@tpr.gov.uk](mailto:report@tpr.gov.uk)

Website: [www.thepensionsregulator.gov.uk](http://www.thepensionsregulator.gov.uk)

**Water Services Regulation Authority (known as Ofwat)**

Contact them about the supply of water and the provision of sewerage services.

Ofwat

Centre City Tower

7 Hill Street

Birmingham

B5 4UA

Tel: 0121 644 7725

Email: [mailbox@ofwat.gov.uk](mailto:mailbox@ofwat.gov.uk)

Website: [www.ofwat.gov.uk](http://www.ofwat.gov.uk)

Online form: [online form](#)