Raising a Concern ("Whistleblowing") Policy

Introduction

Wessex Water is committed to undertaking our business with honesty and integrity in line with our BEST values. We expect all staff and others working for us to maintain these standards of behaviour. When things go wrong or where we are unknowingly harbouring malpractice, intentional or otherwise, we want to be able to put things right. This policy explains how you can help us identify such situations and the support given to you when doing so. Our policy is one of openness. We always encourage our people to speak up. The Company will not tolerate any victimisation (including informal pressure) of any person raising a concern under this policy.

Purpose and Scope

This policy applies to any person working for, or providing services to, the Wessex Water group including all employees, agency workers, contractors, and trainees. This includes any concern we might receive from a supplier, customer or member of the public about malpractice.

The aims of this policy are to:

- Encourage any persons connected to the Company to openly report any suspicions of malpractice as soon as possible and to have the confidence that the matter will be taken seriously and dealt with confidentially.
- Provide a means to escalate concerns without fear of reprimand from others and receive feedback on any action taken.
- Outline the process to be followed in such circumstances.

Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. You should be watchful for illegal or unethical conduct and report anything of that nature that you become aware of.
- Any matter raised under this policy will be investigated thoroughly, promptly and confidentially.
- You will not be victimised for raising a matter under this policy where you have a legitimate concern. This means that your continued employment and opportunities for future promotion or training will not be prejudiced.
- Victimisation for raising a qualifying disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this policy our disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.

If there is anything which you think the Company should know about, please follow the process outlined in the “How to Raise a Concern” guide. By knowing about malpractice at an early stage the Company stands a good chance of taking the necessary steps to safeguard the interests of all staff and protect the Company. In short, please do not hesitate to "blow the whistle" on malpractice.

You should report your concerns to the Group General Counsel, the Group Director of Human Resources or the Head of Internal Audit.
What Should Be Reported?

The types of matters that should be reported include (but are not limited to):

- A criminal offence;
- A miscarriage of justice;
- Health and safety concerns;
- Environmental damage concerns;
- Non-compliance or breach of any statutory obligation;
- Concealment, misrepresentation;
- Serious concerns about the service provision of the Company or the conduct of persons to whom this policy covers (as above);
- Any behaviour that fails to meet our standards and values, or where you are uncomfortable with such behaviour;
- An instruction to cover up or not report something that is required to be reported;
- Any form of discrimination;
- Unauthorised use of Company money or assets;
- Theft, fraud, bribery or corruption; and
- Unethical conduct.

If you are not sure whether you need to escalate or not, consider:

- Is the action or conduct legal/ethical?
- Does it comply with our policies?
- Does it comply with our BEST values, ethics and behaviours?
- Can it be dealt with by other procedures, contract management, performance management etc?

If the answer is no or if you are unsure you should escalate the concern in line with this policy. It is not necessary for you to have proof that such an act or conduct is being, has been, or is likely to be, committed.

Our Guarantee

The Company is committed to this policy and if you use it to raise a concern the Company gives you its assurance that you will not suffer any form of retribution, victimisation or detriment.

The Company will treat your concern seriously and act according to this policy. You will not be asked to prove anything. If you ask for a matter including your identity to be treated in confidence the Company will respect your request and only make disclosures with your consent or where the law requires us to do so.

In any meetings that we might have with you to discuss your concerns you will be allowed to be accompanied by a trade union representative or colleague (if you choose).

Where appropriate you will be offered support throughout the process with access to mentoring advice and counselling. You will be given feedback on any investigation and the Company will be sensitive to any concerns you may have as a result of any steps taken under this procedure.
Guide to How to Raise a Concern

A more detailed step-by-step guide sets out how you can raise a concern and how it will be addressed.

Anonymous Reports

If, despite the legal protections offered by the law and this policy, you would like to disclose your concerns anonymously then you can still make a report to the Group General Counsel, the Group Director of Human Resources, or the Head of Internal Audit.

How the Company Will Respond

After you have raised your concern(s) the Company will confidentially make internal enquiries, and 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.

As far as possible, the Company will keep you informed of the outcome of any enquiries and investigations carried out. However, the Company will not be able to inform you of any matters which would infringe the duty of confidentiality owed to others.

Further Guidance

Further guidance about Whistleblowing is available from the Advisory, Conciliation and Arbitration Service (ACAS).

Raising your Concern Externally

This policy gives you the opportunity and protection you need to raise your concerns internally. The Company would expect that in almost all cases raising concerns internally would be the most appropriate action for you to take.

However, if you feel you cannot raise your concerns internally and you honestly and reasonably believe they are true and that disclosure is in the public interest, you should consider raising the matter with the appropriate regulator. For contact details see the guide on how to raise a concern.

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