



Whistleblowing Policy

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1. Introduction

It is important to our business that any fraud, misconduct or wrongdoing by employees or contingent workers of Scottish Water is reported and properly dealt with. Our policy is to encourage and enable you to raise genuine concerns on a confidential basis where the interests of others or of the organisation are at risk.

Such concerns may for example involve risks to health and safety of you and your colleagues, damage to the environment or fraud or malpractice and may involve actual or potential criminal or civil liabilities. It is vital you raise these concerns as early as possible so that you, your colleagues and Scottish Water can be protected.

If something is troubling you that you think we should know about or look into, please use this policy as a guide to help you report concerns.

If we consider that the concern you raise is a personal grievance we will let you know that it will be progressed through the Grievance Policy.

Further information on this Policy is available on the intranet, from your line manager or People Connect.

2. Whistleblowing Policy

2.1 Our Policy

It is our aim to encourage and enable you to raise genuine concerns you have while working with Scottish Water.

2.2 What is Whistleblowing?

Whistleblowing is the term used when anyone who works for or in an organisation raises a concern about a possible fraud, crime, danger or other serious risk that could threaten customers, colleagues, the public or the organisation's own reputation.

2.3 Who does this Policy apply to?

This policy applies to all employees, Directors and Board members of Scottish Water, Scottish Water International and Scottish Water Horizons. It also extends to all Agency workers, Contingent workers, individuals working with or on behalf of Scottish Water, our Alliance Partners and contractors in the supply chain, whilst it is recognised that their employer will have their own documented policy or code.

2.4 What concerns can I raise?

Concerns raised under the policy are known in law as "Qualifying Disclosures", examples of these are:

- A danger to the health and safety of any individual;
- Damage to the environment;
- A criminal offence;
- The breach of a legal obligation, including a personal data breach;
- A miscarriage of justice; or
- Deliberate covering up of information tending to show any of the above.

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It is best for any concerns to be raised at an early stage but they can also be raised once they have taken place, or if they are likely to happen in the future.

2.5 How can I raise concerns?

You can raise concerns by following any of the suggestions listed in section 3 below. If you have any queries on how to raise concerns please contact: People Connect on 0131 445 6330.

3. Whistleblowing Procedure

3.1 How to raise a concern within Scottish Water

If you have any concerns about practices at Scottish Water you should raise your concerns with your line manager, any senior manager or your direct contact first. You can do this verbally or in writing, and your disclosure will be treated on a confidential basis.

If you do not feel confident or comfortable initially raising your concerns in this way, you can contact our confidential whistleblowing line which is managed independently for us by Safecall. You can contact our whistleblowing line 24 hours a day, 7 days a week, on 0800 915 1571.

The Safecall line is also available to members of the public. It operates in the same way as for employees, enabling relevant concerns to be reported confidentially and anonymously where an individual prefers not to use other existing reporting options. Contact details are available on the Scottish Water website.

Calls will be treated in confidence and a report of the call will be sent to the Head of Internal Audit. Safecall will not disclose your name to the Head of Internal Audit if you wish to remain anonymous.

Advice and guidance is available on any aspect of this policy from People Connect on 56330 or by speaking to any People manager, or externally from Public Concern at Work (see 3.5 below).

3.2 What action will we take?

Once a concern has been reported to us we will look into it and assess what action should be taken internally, or if the issue should be referred to the police. Scottish Water will update Safecall as appropriate, if we are advised that you have given them your contact details in order to be kept advised of the action we propose to take. If we require further information, we will request this from Safecall. Please note, that Safecall will only be able to contact you if they have your details.

While the purpose of this policy is to enable us to investigate qualifying disclosures and take appropriate steps to deal with them, we will provide as much feedback as we can without infringing the confidentiality of others involved.

Data protection breaches will be investigated and may be reported to the Information Commissioner's Office (ICO) as described in Scottish Water's data protection policies.

Policy Owner: People Directorate, Policy & Reward

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3.3 *How am I protected?*

If you make a qualifying disclosure under the Public Interest Disclosure Act you are protected from dismissal, detriment or victimisation when you have made that disclosure honestly and in good faith. Any qualifying disclosure you make to Scottish Water will be treated confidentially and will be dealt with as detailed above.

To make a disclosure you need to have an honest and reasonable suspicion that malpractice has occurred, is occurring or is likely to occur, and make your disclosure in good faith to ensure that it is a qualifying disclosure.

Scottish Water will treat any instances of victimisation or detriment very seriously. Any person within Scottish Water who is involved in or responsible for victimisation or treating the person who has made the disclosure detrimentally will be subject to disciplinary action.

3.4 *If you are not satisfied*

While we cannot guarantee that we will respond to all matters in the way that you might wish, we will handle the matter fairly and properly. By using this policy and the procedures outlined within it, you will help us to achieve this.

If you are unhappy with the response to the concern you have raised, you can go to the People Directorate, the Head of Internal Audit or any of the external bodies as detailed in this policy.

3.5 *Independent advice*

If you would like independent advice at any stage, you may contact:

- The independent charity Public Concern at Work on 020 7404 6609. Their lawyers can give you free confidential advice at any stage about how to raise a concern about serious malpractice at work;
- Your trade union if you are a member; or
- Your solicitor.

3.6 *External contacts*

We hope this policy gives you any reassurance you may need to raise concerns within Scottish Water. There may however be circumstances where you feel you should contact an external organisation. Here are some contact details you may find useful:



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<p>Auditor General for Scotland</p> <p>The proper conduct of public business, value for money, fraud and corruption in relation to the provision of public services</p> <p>The Auditor General for Scotland Audit Scotland</p> <p>Head Office 4th Floor 102 West Port Edinburgh EH3 9DN</p> <p>Tel: 0131 625 1500</p> <p>www.audit-scotland.gov.uk</p>	<p>Scottish Environment Protection Agency</p> <p>Acts or omissions which have an actual or potential effect on the environment or the management or regulation of the environment, including those relating to flood warning systems and pollution.</p> <p>Scottish Environment Protection Agency Erskine Court Castle Business Park Stirling FK9 4TZ</p> <p>Tel: 01786 452595 Fax: 01698 738155</p> <p>https://www.sepa.org.uk/</p>
<p>The Lord Advocate, Scotland</p> <p>Serious or complex fraud</p> <p>The Head of the International and Financial Crime Unit Crown Office 25 Chambers Street Edinburgh EH1 1LA</p> <p>Tel: 0131 226 2626 Fax: 0131 226 6861</p> <p>https://beta.gov.scot/about/who-runs-government/cabinet-and-ministers/lord-advocate/</p>	<p>Health and Safety Executive</p> <p>Matters which may affect the H&S of any individual at work, or the H&S of any member of the public arising out of the activities of persons at work.</p> <p>Health and Safety Executive Information Centre</p> <p>HSE Head Office Health and Safety Executive Redgrave Court Merton Road Bootle Merseyside L20 7HS</p> <p>http://www.hse.gov.uk/contact/information-advice.htm</p>
<p>Scottish Information Commissioner</p> <p>Compliance with the requirements of legislation relating to freedom of information.</p> <p>Office of the Scottish Information Commissioner Kinburn Castle Doubledykes Road St Andrews KY16 9DS</p> <p>Tel: 01344 464610 Fax: 01344 464611</p> <p>Email: enquiries@itspublicknowledge.info</p> <p>http://www.itspublicknowledge.info/home/ContactUs/ContactUs.aspx</p>	<p>The Pensions Regulator</p> <p>Matters relating to occupational pension schemes and other private pension arrangements.</p> <p>The Information Team The Pensions Regulator Napier House Trafalgar Place Brighton BN1 4DW</p> <p>Tel: 0345 600 7060</p> <p>http://www.thepensionsregulator.gov.uk/</p>

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<p>The Police</p> <p>Contacts for all the main police forces in Scotland can be found on:</p> <p>http://www.scotland.police.uk/contact-us/</p> <p>Alternatively phone your local police station.</p>	<p>Scottish Government St. Andrew's House Regent Road Edinburgh EH1 3DG</p> <p>Telephone: 0300 244 4000 Enquiry Line: 08457 741741 Minicom: 0131 244 1829</p> <p>E-mail (Enquiries): ceu@scotland.gov.uk Fax: +44 (0)131 244 8240</p> <p>www.gov.scot</p>
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4. Related Scottish Water Policies (please refer to Scotty)

- Anti-Bribery Policy
- Anti-Slavery Policy
- Code of Ethical Conduct
- Corporate Privacy Notice
- Data Protection Policy
- Fraud Management and Response Policy
- Grievance Policy

5. Legal Background

The Public Interest Disclosure Act 1998 came into force in January 1999. This Act introduced specific rights for those who disclose information, in the public interest on any concerns they have at work.

The Act introduces protection to ensure that all individuals covered by the Act can make a qualifying disclosure and be protected from detriment, dismissal or victimisation relating to that disclosure.