



**Scottish
Water**
Trusted to serve Scotland

Whistleblowing Policy

Version: May 2023

Version Review
Due: May 2024


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Whistleblowing Policy



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This code of ethical conduct was adopted for use in SWS Grampian in July 2020 and so applies to those employees as it does to employees of Scottish Water. Reference to employees within this document therefore includes SWS Grampian and SWS Grampian Highland employees from the above date

1. Introduction

It is important to our business that any allegation of fraud, misconduct or wrongdoing by Scottish Water or contingent workers is reported so that it may be investigated 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 your health and safety or your colleagues', damage to the environment, fraud or malpractice and may involve actual or potential criminal or civil liabilities. It is vital that 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.

Personal grievances must be raised under the Grievance Policy. If you raise a personal grievance via SafeCall, we will refer you to the Grievance Policy.¹

Further information on this and other policies is available on the intranet, from your line manager or from 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 at 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 and any Scottish Water subsidiary, that may be established from time to time (together "applicable parties"). It does not apply to Scottish Water Business Stream, who have their own Whistleblowing policy in place.

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 although it is recognised that their employer will have their own documented policy or code.

¹ where other policies are referenced, if SWS Grampian or SWS Grampian Highland maintain their own policy, then theirs will apply for their employees.

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2.4 What concerns can I raise?

Concerns raised under the policy are known in law as “Qualifying Disclosures”, examples 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.

It is best for any concerns to be reported at the time they arise. They can be reported once the cause for concern has happened, or if it is 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 0330 123 2439.

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 or any senior manager. 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 raising your concerns in this way, you can contact our confidential whistleblowing line which is managed independently 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 to the public 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 if you wish to remain anonymous.

Advice and guidance is available on any aspect of this policy from People Connect on 0330 123 2439 or by speaking to any People manager, or externally from Protect (previously 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. If we require further information, we will request this from Safecall. Please note, that Safecall will only be able to contact you if you have provided them with your details. Being able to obtain follow up information from the individual who first reported a concern can make investigations easier.

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If the matter raised is in relation to a data protection breach, it will be investigated and may be reported to the Information Commissioner’s Office (ICO) as described in Scottish Water’s data protection policies.

3.3 *How am I protected?*

If you make a qualifying disclosure (see section 2.4 for examples) 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.

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

3.5 *Independent advice*

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

- The independent charity Protect on 020 3117 2520 can give you free confidential advice at any stage about how to raise a concern if you’ve seen, heard or suspect wrongdoing in the workplace
- Your trade union if you are a member; or
- Your solicitor.

3.6 *External contacts*

We hope this policy gives you all the 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 Strathalian House Castle Business Park Stirling FK9 4TZ</p> <p>Tel: 01786 457 700 Fax: 01698 446 855</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 Email: wb@tpr.gov.uk</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</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

Where SWS Grampian or SWS Grampian Highland maintains their own version of any of the above policies, then theirs will apply for their employees.

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.

Policy Information	
Owner	People Directorate / Internal Audit
Author	Policy, Reward & Employee Relations
Version	May 2023
Date	May 2023

Document History				
Version	Date	Updated by	Reason for change	Date policy updates communicated & discussed with Consultation / Negotiation Forum

Policy Owner: People Directorate, Policy, Reward & Employee Relations



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June 2020	June 2020	Performance, Reward & Analytics / Internal Audit	SWS Grampian added to policy	
June 2021	June 2021	Performance, Reward & Analytics / Internal Audit	Slight amend to wording of who the policy applies to for consistency with other policies	19/07/2021
July 2022	July 2022	Policy, Reward & Employee Relations	Due for a general review. Reference to SWSG Highland added. Public Concern at Work name updated to Protect and other contact details refreshed	02/08/2022
May 2023	May 2023	Policy, Reward & Employee Relations	Due for a general review. No changes made other than the dates in the header	15/05/2023

Policy Owner: People Directorate, Policy, Reward & Employee Relations