

Good afternoon,

Thank you for sharing your: Consultation on driving better company performance through clear and effective whistleblowing practices – Ofwat.

Please find our response and recommendations to point 3. which we'd be delighted to discuss with your further.

### *3. Multiple and alternative channels for staff to speak up*

*Staff may not want to discuss concerns with their immediate management (such as with their line manager) so we expect alternatives to this to be available such as nominated officers or a whistleblowing hotline. This may include establishing a secure, and confidential, whistleblowing system to allow staff to whistleblow and submit a disclosure.*

*This will increase the sense of security in an organisation. Driving better company performance through clear and effective whistleblowing practices 5 We also expect companies to communicate to staff the option of submitting a disclosure to external bodies such as prescribed persons such as Ofwat. It should also be made clear to staff that they are not required to submit a disclosure internally first before contacting an external organisation with their concerns.*

Crimestoppers is an independent charity whose unique offer of 100% guarantee of anonymity for those who wish, or choose not to be identified when providing information; and we are proud that our promise of anonymity has never been broken in 35 years of operation. Therefore, we would advocate that in addition to secure and confidential systems to allow all staff to whistleblow (Speak Up), there is the ability to provide information anonymously i.e., there are no identifiable details, phone or online records that can identify who that person, therefore no one knows who they are, not even Crimestoppers.

Why is this important? If an individual has the bravery to speak up about wrongdoing, it is no longer acceptable that the individual ends up often becoming the victim – and in some cases finding themselves out of a job. The recent Fear and Futility survey by the National Guardian identified there were organisations where up to 50% of those who responded feared experiencing negative consequences if they do speak up.

We would also recommend the provision of an online channel for those who choose to whistleblow either confidentially or anonymously. As an organisation, we now receive approximately 80% of information and intelligence via online channels; mobile, tablet or laptop. Our bespoke online channel enables the ability to conduct a 2-way, anonymous conversation, through which to request additional information, and provide feedback.

It would also be our recommendation to establish a national reporting system that covers all water companies. This allows for consistency and efficiency of branding in building awareness. It allows means that as personnel move within water companies, the reporting service remains consistent. All information received should be triaged at

the point of reception, and then disseminated to the relevant specific point of contact within the water company that has been the subject of the whistleblower's concern.

Speak Up lines should also have the capability to capture information and intelligence for 2 broad areas: The wrongdoing 'crime prevention agenda', and an 'Employee Engagement agenda'. Under crime prevention we would include compliance, legal and regulatory, fraud and theft, drug use and dealing etc. Under Employee Engagement covers areas such as Health and Safety, bullying, racism, sexism, misogyny, equal opportunities, damage limitation and code of conduct concerns – but the lists above are no means exhaustive.

Anonymity really matters – for a service we provide to one of the blue light emergency services, across the latest 2-month period, 96% of information supplied was provided anonymously.

I hope this is of value.

Kind regards.

David

**David Crawley | Director of Business Growth and Fundraising  
Crimestoppers Trust,**

T: [REDACTED] | M: [REDACTED] | E: [REDACTED]

W: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org) | Switchboard: 020 8835 3700

