

By email: mailbox@ofwat.gov.uk

Whistleblowing Consultation
Ofwat
City Centre Tower
7 Hill Street
Birmingham B5 4UA

12 October 2023

Dear Sirs

Driving better company performance through clear and effective whistleblowing practices (the “Consultation”)

Thank you for sending us the Consultation for our consideration. This letter sets out a few key points in response.

Firstly, we agree that Whistleblowing is an essential pillar of a well-functioning company.

We also agree that having an environment and processes that enable staff to speak up through whistleblowing and ensuring that the company meaningfully engages with these processes, are important internal controls relevant to this obligation.

We note that Ofwat considers that having an effective whistleblowing culture and procedures to be relevant to obligations within their licence in relation to the requirement for adequate systems of planning and internal control to carry out its regulated activities.

We have reviewed Ofwat’s proposed Good Practice Expectations and are confident that we are already satisfying Ofwat’s expectations in terms of good practice, noting in particular that:

- we have an up-to-date Whistleblowing Policy & Procedure;

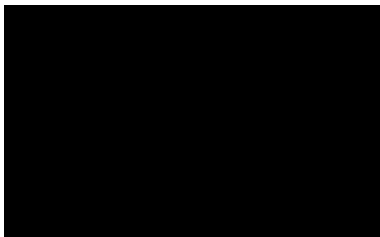
- we have multiple channels through which our people can raise whistleblowing concerns, including an independent whistleblowing telephone line, email address and website interface, run by SeeHearSpeakUp, a leading provider;
- our Whistleblowing Policy & Procedure makes it clear that it may be appropriate for an individual to raise a whistleblowing query with another prescribed person and provides details of where individuals can source details of the relevant prescribed people and bodies for this purpose;
- we have a well-established process for investigating all whistleblowing queries, including those raised via SeeHearSpeakUp; and
- the Audit Committee has oversight of the whistleblowing process and, at least twice a year, the Audit Committee receives a report on all whistleblowing allegations received by the Company and the conclusion of the subsequent investigations.

Therefore:

- We do not have any comments or concerns about Ofwat's proposed good practice expectations; and
- We do not believe that there are any material omissions in terms of Ofwat's expectations that would be relevant to enabling effective whistleblowing arrangements in water companies.

If you have any questions about our response or would like to discuss any aspect of it, please do not hesitate to contact me.

Yours faithfully



Company Secretary, Anglian Water Services Limited