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13<sup>th</sup> October 2023

Dear Ofwat,

**Re: Driving better company performance through clear and effective whistleblowing**

I am writing to you on behalf of independent Water Networks Limited (“IWNL”), part of the BUUK Infrastructure Group of companies, in response to your consultation on [Driving better company performance through clear and effective whistleblowing practices](#), published 18 September 2023. This letter presents a summary of our views on the proposals set out in the consultation and then responds in turn to the questions that you raised. I can confirm that this response is not confidential and can be published on the Ofwat website.

**Summary of IWNL views**

We are grateful to have been given the opportunity to respond to this consultation, as we see the importance that should be attached to Ofwat’s work on whistleblowing. We agree that whistleblowing can play an important role in enabling both companies and regulators to identify and tackle areas of performance that need improvement, as well as building trust and confidence in how companies are delivering for their customers. We also agree that whistleblowing is an essential pillar of a well-functioning company and an important part of the internal systems /controls a company has to effectively manage its activities and risks, including its compliance with its legal obligations.

We are confident that at IWNL we meet all of the proposed good practice expectations specified in the consultation document, and that these have subsequently been enshrined in our dedicated whistleblowing policy. The policy is reviewed annually and approved by our Managing Director; with ultimate authorisation of the policy required from our CEO. A copy of our whistleblowing policy is available on our company intranet which allows it to be easily located by any IWNL employee who wishes to refer to it.

We note that we do not currently make a copy of our whistleblowing policy available on our external website as we did not think it was necessary, but we will now add this to the website so that both employees and external customers can access the policy directly. We are also considering whether it should be placed on all of our other utility websites as a course of best practice.

## **Responses to the specific questions raised in the consultation**

The following sections present our responses to the two questions raised in the consultation.

### **1. Do you have any comments or concerns about our proposed good practice expectations?**

We agree with Ofwat's proposed good practice expectations, and are confident that we are already broadly compliant with them all. We operate an open and honest culture where the opinions of all employees matter and will be listened to; and in the event that this approach ever fails us, our whistleblowing policy offers an alternative channel for employees to raise/progress their concerns. We believe our policy to be comprehensive, easy to follow, and is easily accessible from our company intranet.

The BUUK whistleblowing policy is reviewed annually, and approved by our Managing Director, with ultimate authorisation of the policy required from our CEO. This ensures that our Executive team has a clear understanding of all elements of the whistleblowing policy and that they can therefore provide effective support for the associated provisions.

The policy contains clear procedures for business leaders to follow when managing any disclosures from staff, including specified outcomes that should be secured and insights that should be attained to ensure employees remain protected and valued throughout the whistleblowing process, and once it has concluded.

To ensure that there is clarity across the organisation on the presence and role of our whistleblowing policy, employees receive clear guidance on these issues when they join, and also have access to our up-to-date policy via the intranet. The company has a clear understanding of whistleblowing law and works hard to ensure that it remains compliant.

### **2. Is there anything that our expectations do not cover that you would consider relevant to enabling effective whistleblowing arrangements in water companies?**

We consider the expectations specified in the consultation to be comprehensive and are confident that Ofwat's proposed good practice expectations provide companies with an appropriate framework to enable effective whistleblowing.

I hope that this letter is helpful. If you would like to discuss any of the issues I have raised, please contact me via email [REDACTED] or phone [REDACTED].

Yours Sincerely,

[REDACTED]

Keith Hutton  
**Group Regulation Director**