



Speak Up Policy (HR205) Human Resources

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1 Introduction

1.1 Why is Speaking Up so important?

At Southern Water, we're committed to conducting ourselves lawfully, fairly, ethically and with integrity. Any activity or behaviour that contradicts this commitment could have a major impact on our customers, communities and the environment and our company's reputation, our colleagues, success and ability to operate.

Our Code of Ethics helps us to understand how we should operate our business responsibly and our corporate value of Doing the Right Thing. If you see, hear or read something that isn't right it is important to Speak Up.

We're encouraged to Speak Up if we witness conduct which appears to breach laws, regulations or Southern Water's business conduct policies, and we should also Speak Up if we see conduct which feels inappropriate or unethical. Employees who Speak Up give our company the opportunity to deal with an issue. Remaining silent about possible misconduct may make matters worse and could damage trust. By speaking up and raising concerns, we are living our values and Doing the Right Thing.

Employees who identify and raise issues in good faith are valued and will be protected from any form of retaliation for Speaking Up. The purpose of this policy is to explain how you can raise concerns about suspected misconduct in confidence and without fear of victimisation for having done so. It also describes what you can expect from our company if you Speak Up.

1.2 Who can Speak Up?

The Speak Up policy is available and applicable to everyone working for, or on behalf of, Southern Water. This means employees and contractors working directly for the business who wish to raise a concern about possible misconduct or wrongdoing in our company. We encourage you to first consider talking to your manager, HR representative or trusted representative. Southern Water recognises that this may not always be an option and we have made telephone and web-reporting channels available for these circumstances.

1.3 What concerns are covered by this policy?

This policy can be used to raise concerns about suspected misconduct within our company. That includes any breach of laws, regulations, our Code of Business Conduct and/or the policies under which the company operates. Employees are expected to report, in good faith, any wrongdoing or suspicion of wrongdoing or conduct which feels inappropriate or unethical.

Examples of concerns that can be raised under this policy include:

- Non-compliance with company policies or procedures
- Actions or behaviours in direct conflict with our Code of Ethics
- Inadequate or improper record-keeping
- Conflicts of interest (a situation in which someone may not be able to make an objective decision, as they may personally benefit from the result)
- Disregard for the environment, or environmental regulations and policies

- Disregard for individuals' health and safety, or H&S regulations and policies
- Actions that feel inappropriate or unethical
- Discrimination or harassment
- Fraud
- Bribery
- Neglect
- Improper use of company resources
- Disclosure of confidential information
- Violations of our policies on gifts, entertainment and hospitality.
- Anything else that does not seem right

Do not use this policy:

- for any grievances you may have in relation to your terms of employment
- to report Health and Safety hazards. These should continue to be reported using the hazard and incident reporting line
- to report information security breaches. These should be reported through the IT help desk
- to settle personal disputes
- to make accusations which you know are false

2 Guidance on how and when to Speak Up

2.1 How to Speak Up

The Speak Up policy allows you to raise concerns about suspected misconduct through a variety of channels. These channels don't replace the company's regular reporting lines or complaints procedures such as the Health and Safety Hazard and Incident reporting line or employee grievance procedures.

If you suspect any misconduct or wrongdoing, or you simply need some advice and guidance about a matter of concern, you should first address this directly with the person involved. However, if this wouldn't be appropriate, you can raise questions and concerns through any of the following channels:

- your line manager
- your HR representative or Health and Safety Adviser
- one of our trusted representatives, functions or committees listed below:
 - Head of Company Secretariat
 - Head of Legal
 - Director of HR
 - Company Secretary and General Counsel

Director of Risk and Compliance
Chief Financial Officer
Chair of the Audit Committee of the board.
Contact details of the above can be found on the intranet.

We recognise that concerns can be raised to your line manager or a trusted representative and they are able to raise a Speak Up on your behalf.

The Speak Up policy supports and compliments our Code of Ethics which provides a helpful quick check tool if you are faced with a decision or problem and the right choice is not clear. You can contact ethics@southernwater.co.uk if you want help and support in understanding if what you are doing or being asked to do is ethical and The Right Thing. Please see the Code of Ethics for more information. Please do not use the Code of Ethics email to report misconduct or wrongdoing that it would be appropriate to report through our Independent Speak Up service.

2.2 Independent Speak Up Service

If you suspect misconduct and believe the matter cannot be dealt with through the company's internal channels, you can use the external Speak Up service. This service is hosted by an independent third party, is available 24 hours a day, 365 days a year, and is confidential. There are two ways to submit a report through the service:

Online www.southernwater.ethicspoint.com
Phone 0808 234 3871

To file a concern online, visit the Speak Up service website at: www.southernwater.ethicspoint.com where you can fill in a form to submit.

To raise your concern by phone, call the Speak Up line (free of charge) 0808 234 3871. The line is confidential and independent.

Once your concern has been registered, you will receive a unique code called a 'report key'. This code allows you to call back or access the website to check how your matter is progressing.

Your code will let you see whether the person dealing with your report has feedback or further questions. If you want, you can also provide additional information. Your report key is particularly important if you want to remain anonymous, as we will need it to communicate with you via the Speak Up website.

2.3 What about external whistleblowing?

We strongly encourage you to raise any concerns internally through one of the channels we have listed. Taking a concern to an outside party such as the media or a regulator can have serious implications for the company, the people involved and maybe even for you. By Speaking Up internally, you give our company the chance to look into the matter and take action if needed. In this way we can improve Southern Water together.



2.4 What kind of information do you need to provide?

When you raise a concern (in person, in writing, online or by phone), you should provide as much detail as you can. The information you will need includes:

- the background, history and reason for the concern
- names, dates, places and other relevant facts
- any documents that may support your concerns
- if you know them, details of any laws, regulations, policies, or procedures that you believe have not been followed correctly.

A report can only be followed up if there is enough information to be assessed and if there is a reasonable possibility that more details could be found.

2.5 What if you do not have all the facts?

You should Speak Up as soon as possible – ideally before situations get out of hand or damage is done. If you know of, or suspect, misconduct, share the facts you have. You are not expected to have all the answers or be able to prove that your concern is well-founded. It is the company's duty to look into the matter and decide if there's a reason for concern.

Never investigate the matter yourself and do not seek evidence to build a strong case. No measures will be taken against you if your genuine concern later turns out to have been mistaken or misguided.

3 Safeguarding your position: confidentiality and non-retaliation

3.1 Do reports remain confidential?

All reporting is done confidentially. This means that information about your concern will only be shared with a limited number of people on a strict need-to-know basis. Information will only be disclosed outside this small group if the company is instructed to share it by law or if there is an important matter of public interest at stake. In principle, Southern Water may be obliged to inform the implicated person that a complaint has been filed against them, but your identity will not be disclosed.

You can help protect confidentiality by being discreet and not discussing your report with your colleagues or anyone else.

3.2 Is it possible to report anonymously?

Yes. However, it can be more difficult, and in some circumstances even impossible, to investigate reports that are made anonymously. It is much better to reveal your identity if you possibly can.

3.3 Will your privacy be safeguarded?

Southern Water is committed to protecting the privacy of everyone involved. Everything reasonable will be done to safeguard personal data from unauthorised access and processing. Any personal data obtained as part of the Speak Up policy will only be used for the purposes explained in this document or to comply with the law or an important matter of public interest.

3.4 Non-retaliation – How will you be protected if you Speak Up?

Speaking Up is encouraged and employees who do are protected. Please feel confident that you will not suffer for raising concerns in good faith about suspected misconduct. Any form of threat or retaliation against an employee who Speaks Up will not be tolerated. Any such retaliation will be treated as a disciplinary matter.

4 Follow up – what happens after you Speak Up?

4.1 What can you expect if you Speak Up?

Our company takes every report of possible misconduct seriously. If you submit a report, you will receive a confirmation of receipt within one day. You can use your report key and password to check progress on your report and ask questions.

Your report will undergo an initial review, and if necessary, it will be appropriately investigated. The majority of cases take between one to three months to be resolved. You will be informed of the overall findings. Please note that you will not be able to see full details of the outcome of a case, or any related actions that were taken, for reasons of confidentiality, privacy and the legal rights of all concerned.

We will provide updates at least every fourteen days during the review and investigation, should the case remain open.

4.2 Who will act on your concerns and how?

All concerns received by Southern Water are logged into a case management system. Depending on the nature, urgency and potential impact of your concern, the case will be handled by an appointed person (case manager) who works under the supervision and instruction of Southern Water's Speak Up Committee.

4.3 Review and investigations

The company follows a two-phased approach when handling concerns:

1. Initial review and enquiries to assess the concern by our internal team and decide if it requires further investigation and, if so, by whom and in what form. You may be approached for additional information to help us reach a decision.
2. The appointment of an internal case manager if further review and investigation are needed. The investigation itself will focus on an objective, factual analysis of the case. If needed, outside experts, working in strict confidentiality, can assist with the investigation.

Reviews and investigations are conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles including 'fair hearing'. Details of the case, your identity and the identity of anyone else mentioned in the report, are kept confidential during and after the investigation and are only shared on a need-to-know basis.

4.4 What is expected of you in connection with investigations?

If you become involved in an investigation, you need to cooperate and answer all questions completely and honestly. All parties involved are entitled to confidentiality. Therefore, if you participate in, or learn about an investigation, you must keep the matter confidential.

4.5 Appropriate measures

If your concern is well-founded and misconduct has indeed taken place, appropriate measures will be taken where necessary and in accordance with the law and our policy on disciplinary measures.

What to do if you have a concern about the follow-up of a report?

If you believe that your concern or a concern raised against you has not been handled appropriately or that an investigation has not been performed correctly, please email Committee at Probity.Committee@southernwater.co.uk or the chair of the Audit Committee of the board at Southern Water's head office address.

4.6 More information

If you have questions relating to this policy or need advice, please contact anyone listed in the 'Guidance on how and when to Speak Up' section, on pages 2 and 3.

This policy will be reviewed at least annually.

5 Revision History

Policy number		HR205	Supersedes	All previous versions
Version:	Date of review:	Reviewer name:	Details of changes:	
2	July 2019	Joanne Statton		
3	March 2021	Joanne Statton	2. Update of contacts 3. Addition of Managers ability to raise a Speak up on your behalf.	