



**United Utilities Water Limited**  
Haweswater House  
Lingley Mere Business Park  
Lingley Green Avenue  
Great Sankey  
Warrington WA5 3LP

Telephone: 01925 237000  
[unitedutilities.com](http://unitedutilities.com)

**Our ref:** EIR-749  
**Date:** 07/05/2026  
**Email:** [EIRRequests@uuplc.co.uk](mailto:EIRRequests@uuplc.co.uk)

Dear [REDACTED]

Thank you for your request for environmental information. We appreciate your interest, and we want to let you know that your request has been carefully considered in accordance with the Environmental Information Regulations (EIR).

**Your request:**

Please can I be provided with all information that has been reported to the company's confidential whistleblowing process. Please can this be provided from the date the scheme was set up to the present date.

**Our response:**

A large proportion of the information held does not fall within the scope of EIR as it is not environmental information (as set out in Regulation 2(1) EIR).

There is a very small amount of information that would fall within the scope of the EIR, and we consider that such information is excepted from disclosure in full ("**Withheld Information**"). We set out details of the exceptions below and to assist you, some information on how the confidential Whistleblowing process works at United Utilities.

We are working exceptionally hard at United Utilities to have the right culture focussed on driving standards around safety, quality and compliance. A key part of this is developing a culture which allows anyone to come forward and identify any issues or concerns that they have about any matter.

Our customers and stakeholders deserve absolute confidence in the way we operate, and that starts with creating an environment where people feel empowered to speak up. We want everyone whether they work within our organisation or for a partner organisation to know that their voice matters. If something doesn't look right, if a concern needs raising, or if someone simply feels unsure about an issue, we want them to feel safe, supported, and encouraged to come forward. It is critical that all whistleblowers have the confidence that any concerns they raise will be addressed independently and confidentially and that all such reports and subsequent investigations will be investigated comprehensively and ensure full protection and confidentiality of matters raised and for the colleague who has reported them.

By listening to concerns early and acting on them responsibly, we strengthen our organisation, protect the communities we serve, and reinforce the trust placed in us. We are committed to building a culture where speaking up is seen as a positive act. We will continue working hard to ensure that anyone who raises a concern is provided with a confidential space so that they feel heard, respected,



Water for the North West

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and treated fairly. In doing so, we have established a psychological contract with our colleagues, one that is built on mutual trust and discretion in our Whistleblowing processes. The Trade Union community is supportive and encourage colleagues to use this communication channel if they wish to safely and anonymously raise any matter or concern.

Our approach to Whistleblowing meets the requirements set out by the Corporate Governance code which we adopt as a listed business as well as by Ofwat as our Economic Regulator. Ofwat expects every regulated company to create a culture where people feel safe to speak up, supported by clear, accessible whistleblowing arrangements that comply with the Public Interest Disclosure Act. Boards and executive teams are expected to oversee the effectiveness of these arrangements and monitor trends. They must also ensure investigations lead to learning and improvement, and ensure that all workers understand how to raise concerns and trust the process. Further details of these expectations can be found in Ofwat's "Driving better company performance through clear and effective whistleblowing practices" publication which can be found at [Whistleblowing-Expectations-Document.pdf](#).

We provide a range of channels by which Whistleblowing concerns can be raised. This includes a service provided by our partner organisation Safecall, an external specialist provider who provide a telephone hotline and portal through which potential Whistleblowers can raise concerns independently of United Utilities. Safecall has extensive experience in this area and provides similar whistleblowing services to a range of other significant organisations across the UK.

Further details about our approach to whistleblowing are publicly available and in our [annual report](#), [whistleblowing policy](#) and [codes of conduct](#). What is key and fundamentally underpins this policy is confidentiality and the associated protection afforded to anybody raising concerns. Releasing any such information will contravene this policy and the psychological contract we have offered all employees in the pursuit of having an open and honest culture where they can raise any concerns without fear of identification or recrimination.

### **Exceptions**

After careful consideration, we have reached the decision that, where any information you have requested falls within the scope of the EIR and amounts to environmental information, it is excepted from disclosure because we believe that the information requested is subject to one or more exceptions under the EIR.

We have set out the exemptions that we consider are applicable below.

### **Exceptions that are not subject to the public interest test**

#### ***Regulation 13 – Personal data***

The reports made to the whistleblowing process often contain personal data, whether that relates to the person making the report, or the person or persons who are detailed in or relevant to

the report. Disclosure of the reports would identify or be likely to identify the whistleblower and / or other individuals. Importantly, we need to maintain a system which protects colleagues' identities so that they feel safe and secure to freely report any issue or concern anonymously, free from fear of unfair behaviour or any form of pressure or threat. Even with redactions or by otherwise anonymising reports, we would not be able to avoid the risk that individuals may be identified from the information contained within the reports and we do not have an appropriate lawful basis to make the disclosure under the UK GDPR. As disclosure of any information that would be likely to identify the whistleblower and/or other relevant individuals this would breach Regulation 13 of the EIR as well as the UK GDPR and Data Protection Act 2018, this information is excepted from release. Regulation 13 is an absolute exception and as such is not subject to the public interest test.

#### **Exceptions that are subject to the public interest test**

##### ***Regulation 12(5)(b) – Course of Justice / Confidentiality of Investigations***

We note that reports made to the whistleblowing process may relate to internal investigations, allegations or regulatory matters. Disclosure of the reports would, in live cases, impact the ability of United Utilities to conduct investigations where appropriate. Disclosing this information could prejudice the investigation process, inhibit the gathering of evidence, or compromise the ability of an organisation to properly consider allegations. Disclosure would limit individuals' willingness to make reports of alleged wrongdoing or cooperate with investigations if confidentiality was not afforded. This would inhibit United Utilities ability to investigate matters.

##### ***Regulation 12(5)(f) – Interests of Confiding Individuals***

Whistleblowing processes rely on the expectation of strict confidentiality and discretion, and we make this clear in our company policy. We need to ensure that we protect the free flow of voluntary information from those reporting to the Whistleblowing process. ICO guidance details that environmental information shared by whistleblowers is covered by this exception. Disclosure of the information shared under the whistleblowing process would have a detrimental effect on those who made reports as they were made in the genuine belief that the reports were confidential, and would otherwise be treated with sensitivity and discretion to avoid embarrassing the whistleblower. Reports may, for example, be made about other colleagues or contractors making those reports public could result in conjecture about the identity of the Whistleblower, or the correct identification of the Whistleblower, creating significant workplace friction. The whistleblowers were not legally required to make such disclosures, and they have not consented to the disclosure publicly.

Releasing information, even if anonymised or redacted, would undermine this expectation and deter individuals from raising concerns in future. Additionally, at the time an individual makes a report, there is no expectation or agreement that the information might be disclosed in the public domain. This means releasing any of this information would directly undermine the trust and confidentiality we guarantee to everyone who raises concerns through our whistleblowing service, and we will not compromise that commitment. We have provided a link to our Whistleblowing policy above.

### ***Regulation 12(5)(e) – Commercial sensitivity***

The withheld information in certain circumstances contains commercially sensitive information such as granular financial or commercially strategic information, information that relates to third party contractors or suppliers, internal operational processes and technical or infrastructure data, all of which if disclosed could impact the organisations (and other third parties) economic interests. There is a risk that the disclosure of commercially sensitive information also create a competitive disadvantage.

As the above are qualified exceptions under Regulation 12(5), they are subject to a public interest test. Our assessment of the application of this test is as follows:

#### **Application of public interest test**

##### ***Public interest factors in favour of disclosing the information:***

- Disclosure aligns with the presumption in favour of openness under Regulation 12.
- Disclosure would hold public authorities accountable for misconduct, mismanagement, or unethical behaviour.
- Disclosure would also expose risks to health and safety, such as unsafe working practices or environmental hazards.

##### ***Public interest factors in favour of withholding the information:***

- Disclosure would expose information about individuals and/or working relationships that was given on the basis that it was confidential and to be treated with sensitivity and discretion. This would breach trust in the individuals making the reports.
- Disclosure would impact individuals wanting to come forward to use the whistleblowing service through fear of future public disclosures.
- Releasing information could prejudice ongoing or future investigations, compromise evidence, or influence witness accounts.
- Organisations such as United Utilities rely on confidential, discrete and trusted reporting routes to identify alleged wrongdoing. If people believe their reports may be disclosed, this may discourage Whistleblowers and therefore compromise the effectiveness of the process.
- Allegations made under the whistleblowing process may be unproven or incomplete. Disclosure could unfairly damage the reputations of individuals or the Company.
- Investigators need to be able to proceed with their investigation without being influenced by factors such as external pressure, speculation or misinterpretation of incomplete information.
- Disclosure could cause unnecessary stress or risk to individuals involved, including both whistleblowers or those subject to allegations.
- Disclosure would breach United Utilities obligations under the UK GDPR and Data Protection Act 2018.



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Having weighed these factors, we consider that the public interest in maintaining the exception outweighs the public interest in disclosure.

We appreciate this may not have been the outcome you were hoping for; however, our decision reflects the balance of our obligations under all relevant legal and regulatory requirements that apply as well as the need to ensure we have a culture where colleagues feel they can raise concerns without fear of recrimination. This is something we have worked exceptionally hard on as a business and is demonstrated by our latest employee survey that showed that 87%\* of colleagues feel they can voice their opinion or raise issues of concern. Releasing any information where our policy and processes make it clear that our colleagues are afforded full confidentiality and protection from any reprisals, we believe would undermine the contract we have with employees and the culture of openness and safety, quality and compliance that we have sought to drive.

\*Source: United Utilities 2026 Your Opinion Survey

If you're not satisfied with how we've handled your request, you can request an internal review. To do this, please write to us at Environmental Information Office, Haweswater House, Lingley Mere, Warrington, WA5 3LP or email us at [EIIRRequests@uuplc.co.uk](mailto:EIIRRequests@uuplc.co.uk), addressing your request to [REDACTED], and explaining why you're unhappy with our response. We'll be very happy to review your request and ensure we've done everything we can to assist you.

Any request for an internal review should be made within 40 working days of receipt of this response, and we will reply within 40 working days from receipt of the request for internal review.

Many thanks



We'd love to hear your feedback on how we handled your request! If you have a moment, please complete our short survey [here](#) – your input helps us improve our service.