Policy Statement

As an organisation, Network Rail is trusted with significant resources by the Government and taxpayers. Using those resources appropriately will help us keep this trust. As a public facing organisation we all must conduct ourselves with the highest standards of business behaviour and act with integrity in everything we do, so if we see or suspect that someone is not living up to these high standards we must speak out.

This policy sets out what you can do if you want to report a concern that these standards are not being met. It reassures employees that all concerns raised will be taken seriously, treated in strict confidence and that they will be protected from any reprisal or victimisation as a result of speaking out.

Scope

This policy applies to everyone that works for or on behalf of Network Rail in every wholly-owned Network Rail company, in every joint venture company under Network Rail control, and to Network Rail employees in alliance situations. This includes, but is not limited to, employees (full and part time), contractors, secondees, agency staff, suppliers, consultants and agents.

Joint venture companies not under Network Rail control and joint venture partners should adopt a similar policy.

Reports made to the Speak Out line that are best placed with an alternative Network Rail service (Employee helpline or Close Call) will be re-allocated for investigation. Please familiarise yourself with the final section of this policy to ensure you report your concerns to the most appropriate channel.
Responsibilities

Everyone has a responsibility for raising genuine concerns, suspicions or knowledge of misconduct taking place in Network Rail. This includes situations that are happening outside Network Rail that could have an impact on the company, or situations in which you believe it is in the public interest\(^1\) to do so. Misconduct can range from breaching the Code of Business Ethics or company policy, to breaking the law. If you are worried that something might be wrong, but are not sure, you can ask yourself the following questions about what you have seen.

- Is it, or might it be illegal?
- Does it breach company policy or the Code of Business Ethics?
- How would it look as a headline in a newspaper? How would it portray Network Rail?
- Could it lose the company money?
- Could it harm the environment, or communities that we work in?

If your answer to any of these raise any concern in your mind then you should speak out. By honestly raising your concerns at an early stage you may, for example, help protect the reputation of Network Rail or save the company money. The types of behaviour you should speak out about include:

- Financial malpractice (fraud or corruption)
- Theft, or other criminal activity
- Conflicts of interest
- Dishonesty or unfairness in dealing with customers and suppliers
- Miscarriages of justice, breaches of human rights or acts of modern slavery
- Attempts to hide or assist others in any of the above

You do not need evidence to make a report, reasonable suspicion is enough.

How can I Speak Out?

There are different ways in which you can speak out:

1. In the first instance raise your concerns through your line manager or another senior manager. He or she should always deal with your concerns in a sensitive manner. If you want the matter to remain completely confidential you should make this clear so it can be built in as the situation progresses. If you are a manager and someone has raised a concern with you, guidance on your next steps can be found via HR Direct.\(^2\)
2. If you are not able to approach a manager locally you can contact Rajiv Patel, Director Risk & Assurance (rajiv.patel@networkrail.co.uk) or Suzanne Wise, Group General Counsel (suzanne.wise@networkrail.co.uk) who will ensure that your concern is dealt with.
3. Through the Speak Out Line, our confidential reporting service. You have the option of making a call via the Freephone number 0808 1430100, leaving a voicemail using the same number or making a report online via the web form.

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\(^1\) In Public Interest means making a disclosure in the interests, welfare or wellbeing of the general public.

If you make a report honestly, even if it is not confirmed by subsequent investigation, there will never be any action taken against you. Network Rail does not tolerate any form of victimisation, bullying or harassment of those who raise concerns so if you are facing any form of reprisal it is important to make this known to the ethics team immediately.

**Confidentiality & Anonymity**

The best way to raise a concern is to do so openly by providing your name and contact details. Openness makes it easier for the investigators to assess the issue as they are able to ask follow up questions in order to gather more information if necessary. If you choose to give your personal details to the Speak Out service they will only be known to the service provider and investigations team. If it becomes necessary to pass your details onto others to progress an investigation, you will be contacted in advance. If an internal investigation reveals that a criminal offence has been committed it may be necessary to inform the police.

If you wish to remain anonymous when raising your concerns no one will try to uncover your identity, however it is harder to investigate anonymous calls as further questions or details cannot be retrieved. If you wish to remain anonymous it is really important that you give as much detail as possible in your initial report.

If you make a malicious or ‘joke’ report disciplinary action may be taken against you.

**How are calls handled?**

All concerns raised under this policy will be treated fairly and in complete confidence. The nature of your report will determine who will undertake the investigation process.

The Business Integrity team assess all calls that come through the Speak Out service and may work with other areas and individuals in the business to conduct an investigation.

Investigations do take time so it is important to bear this in mind when raising concerns. There may not be any immediate visible action but this does not necessarily mean that the investigation has been closed or that concerns raised haven’t been taken seriously. It is important that you regularly check back for additional questions from the investigation team about your concern.

**Will I be updated on the outcomes of my report?**

The result of an investigation will depend of the severity of the concerns raised. Details of investigations are kept confidential and only shared on a need-to-know basis therefore it will not be possible to provide outcomes or detailed feedback on reports made. You will be alerted when your case is closed and when the business has taken action.

The Ethics team report periodically on the volume and themes of reports made to the Speak Out service, a full report can be found [here](#).
Is Speak Out the right service to raise my concerns?

In order to make sure your concerns are dealt with as efficiently as possible it is important that they are reported through the right channel. This can sometimes be confusing as many different reporting and advice services are available to Network Rail employees.

The below boxes outline the services most appropriate for different concerns that may arise.

### No, the Speak Out service is not the best service for my concerns

If you have safety related concerns Speak Out is not the best service to use. You should use Close Call reporting via one of the below:

- Phone - 01908 723500
- App – Available on the Network Rail app store
- Email - CloseCallReporting@networkrail.co.uk

If you have HR related concerns including raising a grievance, outcomes of a grievance, bullying, harassment or other people related issues, Speak Out is not the service you should use. The below HR services are the most appropriate channel for these concerns

- HR Online for guidance - www.connect/CorporateServices/HROnline/Default.aspx
- Employee Helpline - 0844 371 0115
- Your HR Business Partner
- Your line manager or another senior manager

### Yes, the Speak Out service is the right channel for my concerns

If you have concerns about any criminal activity, misuse of resource, corruption, deception, breaches of company policy or Network Rail’s Code of Business Ethics, the Speak Out line is the most appropriate service to use. Remember that, where possible, raising your concerns with your line manager or another senior manager is the first action you should take.

- Phone the Speak Out line - 0808 1430100
- Visit Speak Out online – www.intouchfeedback.com/networkrail