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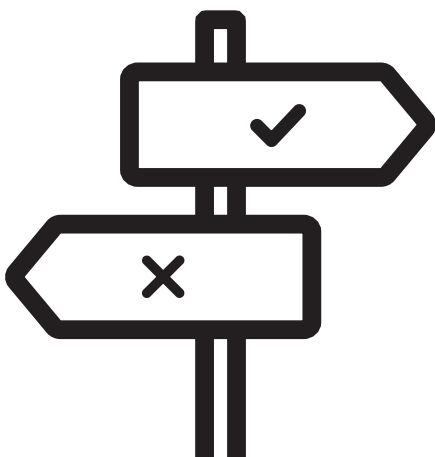
Code

of

Business

Ethics

Doing the right thing



Contents

- A message from Andrew 3
- Introduction 4
- A guide to our code 5



Empowered to ACT

6

- Speak Out 7
- Conflicts of interest and outside activities 9
- Gifts and hospitality 13
- Bribery 14
- Fraud 15
- Modern slavery 16
- Tools to do the right thing 17



Always safe

18

- Dealing with safety concerns 19
- Lifesaving Rules 20
- IT and information security 21



Care about people

22

- Community relations and social responsibility 23
- Charitable giving 24
- Diversity and inclusion 25
- Bullying and harassment 26
- Handling personal information 27
- Social media 28



Teamwork is key

29

- Company records and requests for information 30
- Business travel and expenses 31



Q&A

32



A message from Andrew Haines

Dear colleague,

Our updated Code of Business Ethics brings our values to life and helps us understand how to do the right thing. It's important to know our code, so that we can succeed in doing what's right for each other, our customers, passengers and freight users.

It's also important that we can demonstrate to the public that we have ethical principles, will always act with integrity when managing public money, and that we care about the communities we serve and the environment around us.

We will not compromise on doing the right thing. It's vital to have a culture where everyone feels safe to speak out and is protected for doing so if they see something that they think goes against the code.

We should all be committed to knowing the code and living out our values in everything that we do. You have my commitment on this, and I expect the same from anyone who works at Network Rail.

Thank you.



Andrew Haines
Chief Executive



Introduction

Business ethics is a set of principles that should be the foundation of everything we do.

They include what the law and regulations require of us, as well as how we behave and make decisions, both as employees and as an organisation. Working in an ethical way, alongside our specific operational and regulatory requirements, will help us be safer and perform better.

Our Code of Business Ethics sets the standard of behaviour that is expected of all of us. It's structured by our values and is underpinned by the policies that we follow as an organisation.

There may be times when we're faced with difficult decisions and the right course of action isn't immediately clear. And while no code can have all the answers to every situation that may arise at work, our code is here to empower us in our decision-making, guiding us to do the right thing.



Empowered to ACT



Always safe



Care about people



Teamwork is key



A guide to our code

The code applies to all of us. That's all employees of Network Rail and its subsidiaries, all regions and business areas.

Following this code and its supporting policies is a requirement of working at Network Rail. And it's our shared responsibility to ask questions if we need clarification or advice.

If we don't follow the code and its supporting policies, it could lead to disciplinary action and, possibly, legal action. We realise that we're all human and everyone can make an honest mistake, and we'll take this into account.

We also expect all of our suppliers and contractors to adopt the same high standards. More information can be found in our supplier [Code of Conduct](#).

We are all responsible for:

-  Understanding and following this code and the policies it refers to
-  Living our values to support our vision of putting passengers first
-  Doing business with the highest ethical standards and integrity
-  Treating our colleagues and anyone we deal with in a fair and open way
-  Protecting Network Rail's reputation and not doing anything that could bring the business into disrepute
-  Seeking help and speaking out if we suspect wrongdoing

Managers are responsible for:

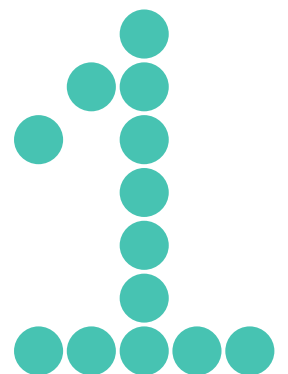
-  Helping your team members to understand and apply our code
-  Holding your team accountable and encouraging them to challenge unethical behaviours at work
-  Being a positive role model and supporting your team members by:
 - Acting consistently with our code and living our values
 - Creating an environment that is inclusive and where everyone is treated with respect and dignity
 - Encouraging your team to speak out if they have concerns
 - Listening to their concerns and responding or reporting as appropriate
-  Supporting those who speak out and never allowing retaliation for reporting or helping with any investigation



Empowered to ACT

It's in your power to do the right thing for those who use the rail network. It's about removing barriers and ensuring that we know how to act, when and where it's required.

Our commitment:
'To use our code
and live our values'.



Speak Out

We know that Network Rail at its best has an open, transparent and accountable culture without fear of reporting.

It means shining a light where we've gone wrong to learn lessons, rather than sweeping things under the carpet. It's important that we all take responsibility for reporting breaches of our code and business policies.

How can I report a concern?

You should first talk to your line manager or another senior Network Rail manager. If for whatever reason you don't want to do that, you should speak out in the following ways (see sidebar).

We understand that deciding to raise a concern can be a challenging time and we know it takes courage. Even if you don't have all of the facts, a reasonable level of suspicion or evidence is enough when speaking out. You can be confident that we won't take action against you for doing so, unless a report is made maliciously or in bad faith. We may consider taking disciplinary action against anyone who has participated in the wrongdoing.

What happens to the information I provide?

All concerns raised under our Speak Out (Whistleblowing) policy will be treated fairly and in complete confidence. Our Counter Fraud and Investigations (CFIS) team will review your concern and either investigate it themselves or pass it to a relevant team or external party to look into.

We understand why you might want to remain anonymous, but we'd recommend leaving your contact details wherever possible so that our CFIS team can follow up with you as swiftly as possible if they need more information.

Investigations can take a long time and, to protect the confidentiality of all involved, we might not be able to give you full details of progress or any outcome; but this doesn't mean the report hasn't been investigated fully.

Speak Out

Use our confidential reporting service called 'Speak Out'. The service is available 24 hours a day, 365 days a year. You can make a report anonymously if you wish. To make your report, you can:



Call the Speak Out freephone number
0808 143 0100



Make a report online
via the web form
speakout.networkrail.co.uk



Contact the Ethics team at
ethics@networkrail.co.uk



Speak Out

How should I report a safety concern?

To report something that has the potential to cause imminent injury or damage to people or the railway, you should contact the relevant control centre for the area or the National Operations Centre (NOC) on 01908 723644 or 01908 723645 immediately.

If you are unable to contact either, you should contact the British Transport Police on 999. For 'non-live' events, please use **Close Call** (our designated specialist safety reporting service). For further information, see the **Always safe** section.

How should I report a grievance issue?

For matters relating to grievances, you should not use Speak Out. Please follow our **Individual Grievance policy and procedure**.

Protection from victimisation

Victimisation is a disciplinary offence at Network Rail. That's why we have a zero-tolerance approach to it. Any form of bullying or harassment against an employee who has raised a concern in good faith is not acceptable. This could include preventing colleagues from reporting wrongdoing, trying to identify someone who has raised a concern anonymously or taking disciplinary action against someone on unfair grounds.

If you experience or witness any form of reprisal as a result of speaking out, contact the Ethics team immediately.

Find out more



[Speak Out \(Whistleblowing\) policy](#)

Who can I talk to?



ethics@networkrail.co.uk

Speak Out
0808 143 0100

speakout.networkrail.co.uk



Conflicts of interest and outside activities

Declarations of interest

A conflict of interest can happen when our personal, social, financial or political activities interfere, or appear to interfere, with our responsibility to Network Rail.

We have two types of conflict of interest, 'workplace' and 'commercial', and everyone working for or on behalf of Network Rail has a duty to avoid these.

It's essential that all recruitment and commercial decisions are impartial, fair and based on merit.

What is a workplace conflict of interest?

This is when you have a relationship or outside activity that could cause, or be perceived to cause, a conflict of interest with your Network Rail role.

Some examples of this would be:

1

You have a relationship with an individual in the company and could make business decisions about them (for example, performance reviews, pay talks, grievances)

2

You're about to recruit and may know a candidate

3

You're about to manage a relative

4

You take part in an outside activity that could affect your duties for Network Rail because of fatigue, time management, or conflicting priorities

If you believe you may have a potential workplace conflict of interest, you should discuss the situation with your line manager and make a declaration on iEthics.

Find out more



[Conflicts of Interest and Outside Activities policy](#)

iEthics can be found in the Oracle E-Business Suite, within 'Employee Self-Service'

[Working with Relatives and Personal Relationships at Work policy](#)

Who can I talk to?



ethics@networkrail.co.uk



Conflicts of interest and outside activities

What is a commercial conflict of interest?

A commercial conflict of interest could occur if you are making business decisions (such as taking part in an upcoming procurement process) and you have an association with a supplier/ company that could affect, or appear to affect, your impartiality, judgement or the effectiveness expected from you in your role for Network Rail.

Some examples of this would be:



You have a relationship with an individual at a supplier or external company



You're an ex-employee of a supplier or external company



You have an association with a supplier or external company (for example, non-executive director role)

If you believe you may have a potential commercial conflict of interest, you should discuss the situation with your line manager and make a declaration on iEthics.

Find out more



[Conflicts of Interest and Outside Activities policy](#)

iEthics can be found in the Oracle E-Business Suite, within 'Employee Self-Service'

Who can I talk to?



ethics@networkrail.co.uk



Conflicts of interest and outside activities

Share dealing

While Network Rail is not a listed company, we frequently work with other organisations that are listed on the stock exchange. If these organisations were to win or lose a contract with us, their share price could be affected.

You can hold shares in organisations that do or want to do business with Network Rail. But it's against the law to buy or sell shares (or encourage someone else to do so) based on unpublished, price-sensitive information that you've found through your work at Network Rail.

Using the Commercial Conflicts of Interest Register on iEthics, you should declare if you or someone you have a close personal relationship with hold shares in an organisation that does or wants to do business with Network Rail.

Find out more



[Conflicts of Interest and Outside Activities policy](#)

[Our Guidance on Share Dealing](#)

iEthics can be found in the Oracle E-Business Suite, within 'Employee Self-Service'

Who can I talk to?



ethics@networkrail.co.uk



Conflicts of interest and outside activities

Outside activities

You should always make sure that outside activities don't interfere with your ability to fulfill your responsibilities, and that you manage fatigue appropriately, as we all have a responsibility to take care of the health and wellbeing of ourselves, as well as consider that of our colleagues around us.

It's also important to make sure that you don't use knowledge gained at Network Rail to benefit someone outside the organisation.

You should discuss any outside activities with your line manager when the first opportunity arises, and on a regular basis going forwards, so they're able to assess whether the activity is manageable with your role at Network Rail and/or whether it's adversely affecting your ability to fulfill your duties. You should check your contract of employment for any express obligations.

Some examples of this would be:

1

You would like to take on a second job

2

Consulting

3

You would like to/have set up a company

4

Directorships

5

You would like to start a volunteer role

6

Taking part in political activity, such as running for local council

Find out more



[Conflicts of Interest and Outside Activities policy](#)

[Fatigue reduction SharePoint site](#)

iEthics can be found in the Oracle E-Business Suite, within 'Employee Self-Service'

Who can I talk to?



ethics@networkrail.co.uk



Gifts and hospitality

Gifts and hospitality are anything offered to you by someone outside of Network Rail, or anything you offer to someone outside of the company.

All offers of gifts or hospitality, both by and to you, must be registered on iEthics, whether you choose to accept them or not. The only exception to this rule is when you're offered items with an approximate value of £15 or less.

Gifts and hospitality could include items ranging from corporate merchandise or a bottle of wine, to tickets to events, hampers and free meals, travel or accommodation.

Hospitality is only appropriate where it's necessary for the development of legitimate business relationships. There should always be a clear business rationale for accepting or offering something, and it should always be modest in value, timed appropriately and must be recorded and approved through iEthics beforehand.

You should also consider how the situation might look to the outside world and, because of this, hospitality involving sporting events should not be accepted under any circumstances.

If offers of gifts and hospitality are not handled correctly, it could make the offers look like an attempt to influence decisions, and in some instances, could even be seen as a bribe.

Find out more



[Gifts and Hospitality policy](#)

iEthics can be found in the Oracle E-Business Suite, within 'Employee Self-Service'

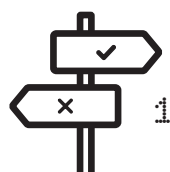
[Business Travel and Expenses policy](#)

[EthicsApp](#)

Who can I talk to?



ethics@networkrail.co.uk



Bribery

Bribery can take various forms and can include gifts, hospitality, personal benefits, offers of employment and cash.

We all need to be mindful of the intentions of external parties when they offer us anything and consider whether there's any conditions or expectations attached as a result of accepting. This is especially important when we're in the process of awarding contracts or making important business decisions.

Network Rail operates a zero-tolerance approach towards bribery. Employees found to be in breach of our Anti-Bribery policy will face disciplinary action and could be referred to the police, potentially resulting in imprisonment under the UK Bribery Act 2010.

From time to time we work abroad. That doesn't change our position on bribery. We're bound by UK law and must comply with it wherever we operate, alongside any additional local laws.

Find out more



[Anti-Bribery policy](#)

[Bribery Act 2010](#)

Who can I talk to?

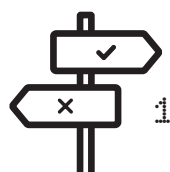


You can report a concern to Speak Out via:

speakout.networkrail.co.uk

0808 143 0100

ethics@networkrail.co.uk



Fraud

Fraud is an act of dishonesty intended for personal gain or to cause loss to another party. It goes without saying that we should never do it.

Fraud can take three forms: abuse of position (for example, using a company vehicle for personal purposes such as moving); false representation (for example, overstating a timesheet); or failure to disclose (for example, failing to disclose that a contractor doesn't have a Personal Track Safety (PTS) certificate).

Committing fraud is a disciplinary offence. If we find evidence of fraud, these cases will be referred to the police.

If you suspect fraud, you should report your concerns via the Speak Out service or any of the other channels listed in the **Speak Out** section of this code.

Find out more



[Anti-Bribery policy](#)

[Bribery Act 2010](#)

Who can I talk to?



You can report a concern to Speak Out via:

speakout.networkrail.co.uk

0808 143 0100

ethics@networkrail.co.uk



Modern slavery

Modern slavery is the illegal exploitation of people for personal or commercial gain.

We will do everything we reasonably can to stop all forms of modern slavery in any part of our business or supply chain.

Modern slavery is not just something that happens elsewhere. Victims are controlled by force, threat, coercion and deception. It can take various forms, including trafficking of people and forced labour.

We respect the human rights of anyone working for us or on our behalf and we provide our employees with a safe working environment and fair terms of employment.

Everyone has a responsibility to speak out if they have concerns relating to human rights violations or acts of modern slavery. This includes raising concerns about those we do business with or those who do business on our behalf.

Find out more



[Anti-Slavery and Human Trafficking policy](#)

[Network Rail Modern Slavery statements](#)

[Modern Slavery Guidance for Procurement Practitioners](#)

Who can I talk to?

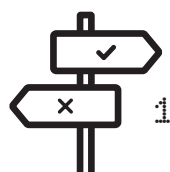


You can report a concern to Speak Out via:

speakout.networkrail.co.uk

0808 143 0100

ethics@networkrail.co.uk



Tools to do the right thing

If you're faced with a difficult decision and it's not immediately clear what the right thing to do is, follow our values, code and policies, use your good judgement and make use of the tools we have to help empower you in doing the right thing.

EthicsApp

EthicsApp can help you make ethical decisions on the go. It contains all of our ethics policies along with an interactive decision-making tool to support you in making the right choices around gifts and hospitality, conflicts of interest and speaking out.

You can download it to any device through the Network Rail App Catalogue, or desktop users can access an online version [here](#).

iEthics

iEthics is our online register for logging all declarations of offers of gifts, hospitality and conflicts of interest and supports us to be transparent and challenging in the decisions we make.

Using iEthics is the start of a conversation. Your line manager will be able to view your declaration, add comments, and talk to you about any action needed.

iEthics can be found in the Oracle E-Business Suite, within 'Employee Self-Service'. If you don't have access to a computer, speak to your line manager or HR business partner, who will be able to help you.

Find out more



[Ethics page on MyConnect](#)

[Ethics mandatory e-learning](#)

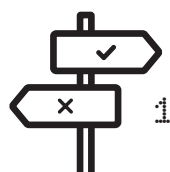
[Ethics page on Network Rail external website](#)

[EthicsApp](#)

Who can I talk to?



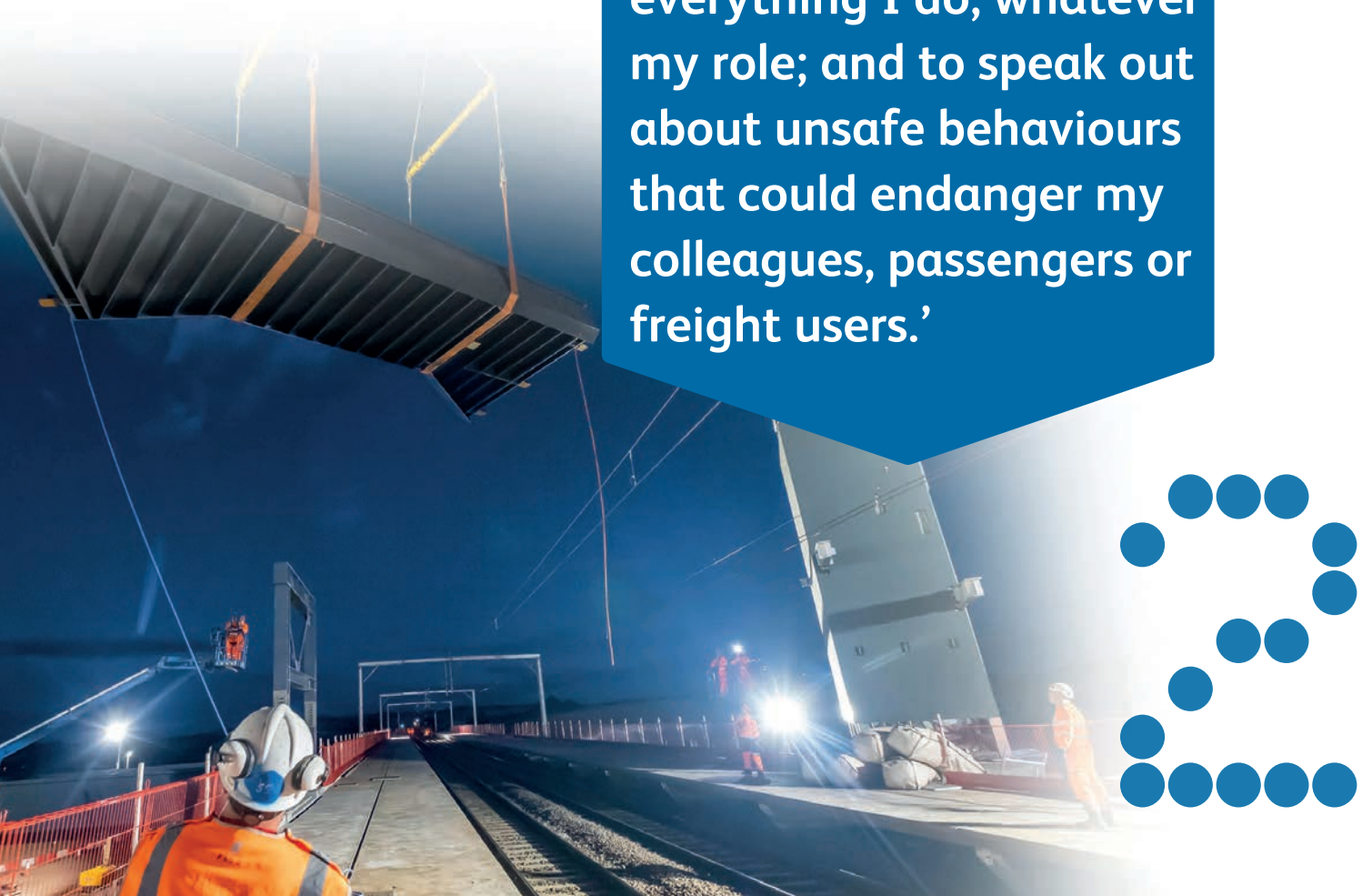
ethics@networkrail.co.uk



Always safe

Safety is non-negotiable when moving millions of people every day. With clear accountability, we challenge unsafe practices and take personal responsibility for addressing risks, resolving issues and protecting the safety and wellbeing of our colleagues, passengers and freight users.

Our commitment:
'To prioritise safety in everything I do, whatever my role; and to speak out about unsafe behaviours that could endanger my colleagues, passengers or freight users.'



Dealing with safety concerns

No one should be forced to work if they feel there is a risk of an accident or incident occurring.

Our work-safe procedure applies to all Network Rail staff as well as our suppliers and contractors.

If you're worried about safety, immediately stop what you're doing (unless that would endanger others). Then go somewhere safe and contact the person in charge, explaining why you've stopped.

If trains are at risk, contact the signaller immediately.

Drugs and alcohol

Every year, Network Rail highlights the dangers of intoxication in and around the railway to the public, and just as importantly, it applies to colleagues in the workplace too.

Drugs and alcohol affect people's ability to work safely, which is a risk to individuals as well as to the organisation.

We have **Lifesaving Rules** and a strict **Drugs and Alcohol policy** in place, as well as drugs and alcohol testing. These exist to make sure all our colleagues and passengers get home safe every day.

Find out more



[Drugs and Alcohol policy](#)

[Wellbeing portal](#)

[Lifesaving Rules](#)

Who can I talk to?

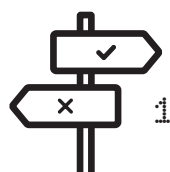


Safety concerns can also be reported through CIRAS, the rail industry's confidential incident reporting system:

0800 410 1101

Text: 07507 285887

Freepost: CIRAS
www.ciras.org.uk



Lifesaving Rules

We want to get everyone home safe every day.

We're all responsible for working safely so that our employees, the public, our customers, contractors and suppliers aren't put at risk when using or working on the rail network.

Always follow our **Lifesaving Rules**, whether you are working on the track or in the office.

Always report events that have the potential to cause injury or damage through the Close Call system. This way we can learn from our near misses and prevent similar things happening again.

Close Call

For 'non-live' events, please use Close Call (our designated specialist safety reporting service), using any of the options below:



01908 723500



Email:

CloseCallReporting@networkrail.co.uk



[Close Call app \(Network Rail devices\)](#)

[Close Call App \(External\)](#)



IT and information security

The business relies on vast streams of information to get the job done, and we all have a part to play in keeping our data and IT networks secure.

Information security (InfoSec) is a key consideration when it comes to maintaining our railways and effectively collaborating with one another.

By using the simple rules below, we can make sure that we all continue to work safely and efficiently, using information to support our daily tasks and keep the rail network running.

You should:



Keep your device and the systems you use secure



Keep your data safe from malicious actors (like hackers)



Make sure your data is available when the business needs it

Find out more



[Information security policies, guidance and information](#)

Who can I talk to?



IT Helpdesk

To report an IT incident call, **085 51600** (internal) or **01270 721600** (external)

For faults, requests, FAQs and guides, you can also refer to [IT Helpdesk Online Support](#)

[AskSecurity@](mailto:AskSecurity@networkrail.co.uk)

networkrail.co.uk

for any general security queries or issues

[SpamandPhishing@](mailto:SpamandPhishing@networkrail.co.uk)

networkrail.co.uk

for reporting spam and phishing

[DataProtection@](mailto:DataProtection@networkrail.co.uk)

networkrail.co.uk

for reporting any potential data protection breaches



Care about people

Passionate about service, we are customer-driven and put ourselves in the shoes of passengers and freight users. We look out for each other and treat others the way we wish to be treated.

Our commitment:
'To always treat my colleagues, customers and passengers with respect and kindness, and challenge those who don't.'



Community relations and social responsibility

We're working hard to become a more responsible company. That's why we expect everyone in our business to be a courteous and helpful neighbour, as well as to comply with laws, regulations and company procedures.

This means we're working with communities to minimise any negative effects of our work, cutting noise, reducing disturbance caused by deliveries to our sites and taking care of issues like graffiti, trespassing or fly-tipping on our property. We also address the impact our work has on our people, buildings, our supply chain and the environment.

It's essential that we all play our part in meeting our environmental and social responsibility commitments and help our stakeholders to meet theirs.

Find out more



[Environment and Sustainability on MyConnect](#)

[Environmental Sustainability Strategy](#)

[Social Value Framework](#)

Who can I talk to?



SustainableDevelopment@networkrail.co.uk



Charitable giving

As one of the biggest organisations in the country, we are approached by all sorts of different charities and worthwhile causes.

You should pass on any such requests to the charitable giving team at CharitableGiving@networkrail.co.uk.

In 2014, Network Rail became an arm's-length central government body, so it's not possible for Network Rail to give donations or sponsorship.

But there are lots of ways we support charities that are close to our hearts, such as payroll giving, fundraising and volunteering. Network Rail employees fundraise on behalf of, and alongside, five national charity partner organisations and we also encourage supporting local charity work.

Find out more



[Ethical Guide to Charity Events](#)

[Charity Collections at Stations policy](#)

[Charitable Giving](#)

[Routes out of Homelessness](#)

[Anti-Bribery policy](#)

[Volunteer Leave policy](#)

[Volunteering](#)

Who can I talk to?



CharitableGiving@networkrail.co.uk

ethics@networkrail.co.uk



Diversity and inclusion

Diversity means that we recognise the differences amongst our people and our passengers.

These differences make each of us unique and no one should face discrimination because of this.

Inclusion means that we want a workplace where everyone is valued, and our railway is a place that every passenger can use. And at times we will make sure we have thought about the differences and made good arrangements – for example, a disabled passenger moving around our stations, or a disabled employee getting reasonable workplace adjustments.

Our Equality, Diversity and Inclusion policy describes how we treat people in our business. If you break the policy, we might have to take disciplinary action, which could lead to us dismissing you.

Failing to stick to our policy is bad for our reputation and can lead to Network Rail being penalised, through employment tribunals, the Office for Rail and Road (ORR), or the Equality and Human Rights Commission (EHRC).

Everyone at Network Rail has the right to be treated fairly, and with dignity and respect, regardless of our differences.

Find out more



[Equality, Diversity and Inclusion policy](#)

[Diversity and Inclusion Hub](#)

Who can I talk to?



DiversityAndInclusion@networkrail.co.uk

If you feel that you or anyone else has been discriminated against, harassed or bullied, please raise your concerns with your line manager if appropriate, or local HR Business Partner.



Bullying and harassment

Bullying and harassment is totally unacceptable.

We won't tolerate it and, where necessary, will take appropriate disciplinary action.

We urge everyone in the business to report this type of behaviour, either through the line-management structure, through HR or Speak Out (although, please note that Speak Out should not be used to report individual complaints or grievances).

We know that it takes honesty and courage, but it's important.

Find out more



[Wellbeing portal](#)

[Harassment policy](#)

Who can I talk to?



If you feel that you or anyone else has been discriminated against, harassed or bullied, please raise your concerns with your line manager if appropriate, or local HR Business Partner.



Handling personal information

We all use personal information on a daily basis. From HR files and meeting recordings to CCTV and lineside neighbours' contact information. It helps us achieve our business objectives and keeps the railway running.

We need to treat personal information with care because if we don't, it could lead to a data breach. Breaches can cause distress to the individuals involved as well as resulting in large fines and damage to our reputation. If you think there's been a breach involving personal information, you should email the Data Protection and Security teams as soon as possible for support in reviewing the situation and next steps.

To help reduce the risk of breaches, we have the Data Protection Assurance System (DPAS). The DPAS is a tool you need to use if you're planning on setting up a new process which involves personal information, such as a new project, system or survey, or making changes to an existing one. It'll help risk assess your proposed activity and make sure you're aligned to the data protection principles.

Find out more



[Data Protection MyConnect page](#)

[Data Protection Essentials e-learning training](#)

[Data Protection \(including GDPR\) Yammer group](#)

[Data Protection Assurance System \(DPAS\) on MyConnect](#)

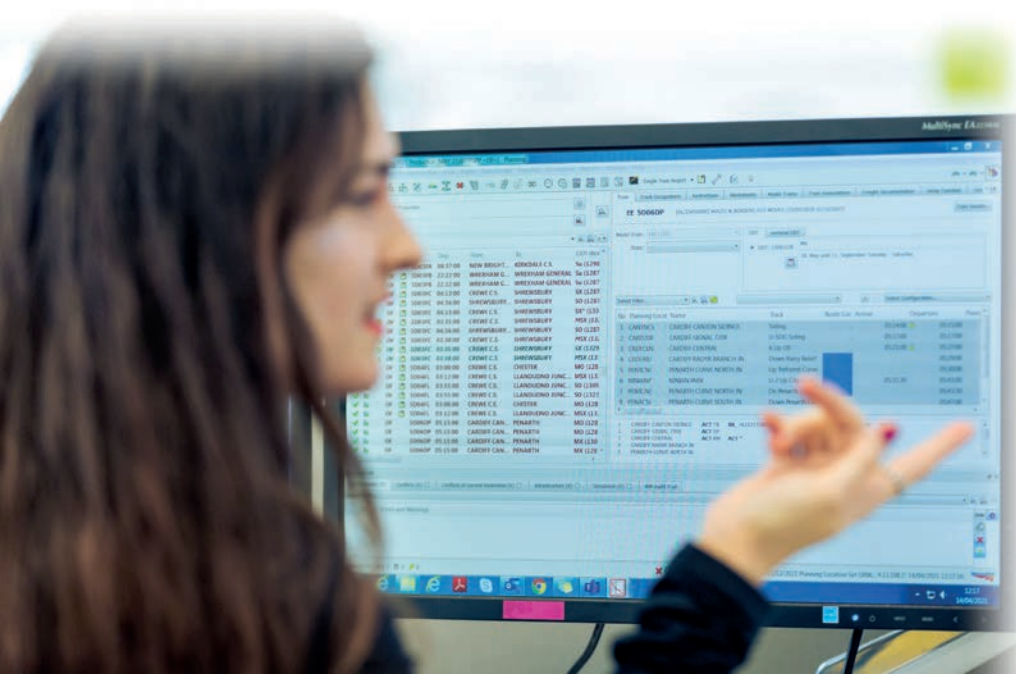
Who can I talk to?



DataProtection@networkrail.co.uk

To gain access to the DPAS, contact the Route Services Business Systems Support team on RSBusiness@networkrail.co.uk

AskSecurity@networkrail.co.uk for any general security queries or issues



Social media

Social media, such as Facebook and Twitter, is increasingly used to communicate, discuss and disseminate information, and we have a team whose job is to manage and use it on behalf of Network Rail.

It's important no one else does so, unless they've been trained and have the right approval.

The lines between your personal life and your work life can become blurred when using social media. When using your own social media accounts, always ensure that it is clear that your comments are your own and not those of Network Rail.

It's important to never post anything that could damage Network Rail's reputation or bring the company into disrepute. If in doubt, seek advice. If you think something could be considered inappropriate or offensive, refrain from posting it.

Top tips when using social media:



1 Always think before you post. Assume that what you post could be shared and read by anyone.



2 Think about who can see what you share, and manage your privacy settings. Remember that privacy settings cannot guarantee that something you post will not be publicly visible.



3 Maintain appropriate professional boundaries if you communicate with colleagues in the rail industry, customers, members of the public or third parties.



4 Do not post confidential information.



5 Do not post inappropriate or offensive material.

Find out more



[Social Media policy](#)

Who can I talk to?



[SocialMedia@
networkrail.co.uk](mailto:SocialMedia@networkrail.co.uk)

ethics@networkrail.co.uk



Teamwork is key

With a common vision and goal in mind, we pull together as one to do the right thing for passengers and freight users.

Our commitment:
'Together with my team, I will follow our code to put passengers first and do the right thing every time.'



Company records and requests for information

Information is one of the most important assets we have.

Good record-keeping is key to us being able to work effectively and keep our reputation for openness and honesty. We all need to make sensible, informed and timely decisions about the information we should keep and how long we need to keep it for, as well as what can be safely destroyed. If we get these decisions wrong, it could cost Network Rail a large amount in fines and penalties and makes it harder to find the information when we need it and give excellent customer service.

As an arm's-length government body that spends public funds, we may be asked for information for a variety of reasons under the Freedom of Information Act (FOIA) and the Environmental Information Regulations (EIR).

If you get a request for information that isn't part of your day-to-day role, or if a request mentions FOIA or EIR, speak to the FOI team immediately at foi@networkrail.co.uk.

They're the experts and are here to help everyone in the business. If you're asked by the FOI team to give information to them for a request, it's important to respond as quickly and as helpfully as you can.

Find out more



[Freedom of Information](#)

[National Records Group](#)

[Corporate Records Retention Schedule](#)

[Quick Guide – Disposal of Records](#)

For information about Network Rail that we proactively publish, see our [Transparency](#) page

Who can I talk to?



foi@networkrail.co.uk

National Records Group
NRGENquiries@networkrail.co.uk



Business travel and expenses

It's important that we can demonstrate ethical principles when spending public money.

Collaborating with our colleagues and stakeholders is important, but we should think about how we deliver value for money every time we travel for business or claim expenses.

Before arranging a meeting, think about alternative ways to do business, including telephone or Teams calls, to avoid the need to travel to other locations and help keep our travel expenses good value and appropriate.

Our **Business and Travel Expenses policy** applies to the majority of Network Rail staff, with the exception of maintenance colleagues on former Infrastructure Maintenance Company contracts who have separate contractual expenses arrangements.

Find out more



[Business Travel and Expenses policy](#)

Who can I talk to?



Contact **iExpenses@networkrail.co.uk** for queries concerning expense claims





Empowered to ACT

My son has applied for a role in my team. If successful, he would report into me. We are both very professional: we'd make sure everything is above board and no favouritism is shown on any matters. Does this need to be logged on iEthics?

Yes. If you're involved in any sort of decision-making (particularly in relation to recruitment or commercial processes), it's important that you consider any potential conflicts of interest and log them on iEthics

Staff shouldn't be involved in any aspect of a recruitment process that involves someone they're related to (or have a close personal relationship to). And it's likely that line-manager responsibilities would need to be transferred to another appropriate person to avoid any allegations/appearance of bias in relation to business decisions (for example, performance reviews, preferential annual leave, and so on).

If you find yourself in a situation that could lead to a potential conflict of interest, log the matter on iEthics and speak to your local HR Business Partner for support in putting steps into place.

I work closely with a local supplier who has given me and my family tickets to a charity event. Is it OK to go?

No. Generally speaking, other than the Railway Ball, anything involving your partner or other family members is not acceptable. As a general rule of thumb, a modest token of gratitude with a value of £15 or under, such as a bottle of wine at Christmas, is usually OK to accept. But you should always consider whether you have a business justification for accepting an offer and be mindful of the intentions, the timing, and how it might look to your colleagues, suppliers and the public. If it's over £15, it should be logged on iEthics, whether you want to accept it or not.

You are tendering works for a new contract to do remedial works in the depot. One of the vendors sends an iPad and £250 of Apple Store vouchers to your home – what should you do?

There are a few things. You should never accept a bribe from anyone (even if the request and offer seems quite trivial, such as a few crates of beer to help swing a decision a certain way).

In this case, the offer is substantial and it's clear the vendor is grooming you to favour them. You should return the gift, raise your concerns through your line manager and Speak Out, and record the gifts on iEthics so there's a record of you receiving and returning the iPad and vouchers.

Accepting these may be seen as a bribe and could put the integrity of the tender process in doubt.

I've noticed that my colleague frequently leaves work early. And I know that their timesheet always includes overtime, yet they don't even seem to work their core hours. I decided to say something to them, but they just told me that they really need the money at the moment as times are tough. Should I tell my line manager?

Yes. If someone is falsifying timesheets, they are committing fraud and causing a loss to Network Rail, which could lead to disciplinary action. It's important that you tell your line manager or another senior manager about your concerns. If you don't feel comfortable doing that, you can use the confidential Speak Out service instead.

There might be a straight forward explanation. Perhaps your colleague is making up the time at home and, if this turns out to be the case, as long as you raised your concerns in good faith, we won't take any action against you for speaking out.

How would I know if a colleague, or a member of staff at one of our suppliers, is a victim of modern slavery?

There are a number of warning signs that may indicate someone is a victim of modern slavery including:

- Colleagues showing signs of physical abuse and/or appear malnourished or unkempt
- Colleagues who seem to have few personal possessions or often wear the same clothes
- Colleagues who appear frightened or reluctant to talk to others
- Colleagues who are dropped off or collected for work by the same person regularly, either very early or very late at night.

If you suspect someone may be a victim of modern slavery, you can speak out via a line manager,

speakout.networkrail.co.uk

T: 0808 143 0100 or

E: ethics@networkrail.co.uk





Always safe

You notice a colleague is showing signs of fatigue: they appear grouchy, they yawn a lot, and you've noticed a few mistakes in their work. Should you involve yourself?

Yes. In line with the Fatigue Risk Management Standard, we all have a duty of care to ourselves and others with regards to fatigue-related fitness while at work, and should raise concerns if a potential safety risk is identified.

Try talking with the colleague and make them aware of your observations, as people under the influence of fatigue don't always recognise the risk in themselves. Ask them to talk with their manager to help assess / mitigate the risk.

If nothing happens, talk to the manager yourself. If they can't help, raise it with HR, Close Call or our Speak Out line.

You recently tripped over some loose floor covering in an office. You didn't hurt yourself, but someone mentioned that you should Close Call it. It seems silly, when safety is all about keeping trains running safely, but should you report it?

Always report safety concerns via Close Call, even if they seem trivial, so they can be put right. Something that might seem minor to you could be dangerous to others or could result in a serious accident.

Slips, trips and falls can result in surprisingly serious injuries and long periods of time off work for an individual and disruption for their team.





Care about people

Can I ask suppliers or other business partners to donate prizes for a raffle or to sponsor me or my team?

No. You shouldn't seek prizes or sponsorship from Network Rail suppliers. This can create feelings of obligation or awkwardness and might look inappropriate to the outside world, especially if the person or their company is competing or intending to compete for a Network Rail contract soon, for example.

Any donations in this context could be misconstrued as an attempt to influence decisions. And we'd want to avoid receiving any excessive contributions, blank cheques or cash "in hand". So fundraising links, such as those in your email signature, shouldn't be sent in emails outside of the organisation.

If you have any questions, please contact CharitableGiving@networkrail.co.uk or ethics@networkrail.co.uk for specific advice. Equally, we aren't allowed to auction Network Rail property, so if you have a redundant asset that you're hoping to sell or donate, you should contact redundantassets@networkrail.co.uk in the first instance.

I've heard about diversity and inclusion champions, but I'm not sure what they do. How do I find out more about it?

Diversity champions and volunteers act as role models across the business, promoting diversity and inclusion, taking action where appropriate and challenging behaviours where necessary. You can find more information in the [Champion role description](#), and send your completed [application form](#) to DiversityAndInclusion@networkrail.co.uk.

I'd like to raise awareness of diversity and inclusion issues within my team and wider function. How can I do this?

There are a number of employee networks at Network Rail that you can promote to your team, which not only help colleagues to empathise and care for each other, but are also an effective way of helping us to reflect and understand the communities that we serve. For more information on employee networks please see the [Diversity and Inclusion Hub](#).

I've received a request from someone who wants to see a copy of the data we hold on them. How do I know what counts as personal information and whether I should share this?

Personal information is defined as "any information that relates to an identified or identifiable living person". It includes both digital and paper-based data and could include a broad spectrum of information ranging from emails and contact details through to GPS data and text messages depending on the nature of the recorded information.

Individuals have a right to access the data we hold on them. However, the Data Protection team are best placed to review these requests and provide support. Therefore, you should forward the request on to the Data Protection team as soon as possible.





Teamwork is key

I've been asked for information by the FOI team, to help respond to a request. I'm worried the data is sensitive, what should I do?

It's really important that you provide copies of the requested information to the FOI team, even if you are concerned about the information being made public. Network Rail has a legal obligation to respond to all FOI and EIR requests, but this doesn't mean that sensitive information will automatically be given out.

When you send the information to the FOI team, tell them what your concerns are. The team will look at the records and ask you to tell them more about the harm that would be caused if they were made public – this will help them to see if they can use a legal exemption to protect the information.

A supplier has invited me to attend an industry awards event. It's a fair distance from where I live, so I'd need an overnight stay in a hotel. The supplier has offered to foot the bill for the hotel and travel arrangements. This seems like a generous offer and would save Network Rail money. Can I accept?

You should log the offer on iEthics regardless of whether it's accepted or declined. Provided you discuss the offer with your line manager and they're content that there are business benefits, such as developing good working relationships and networks with our suppliers, it should be fine for you to attend.

However, you'd need to decline the offer of free travel and accommodation, as this could likely involve significant fees and wouldn't be considered appropriate to accept.

If there's a genuine business need to attend or stay overnight, then Network Rail should meet the costs involved to avoid any awkward perceptions or questions of wrongdoing arising.



