

Whistleblowing Policy (Public Interest Disclosure)

we are
the network

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1. Definition / Purpose

What is a Whistleblower? *‘a person who informs on a person or organisation regarded as engaging in an unlawful or immoral activity’.*

The purpose of this policy is to provide colleagues with appropriate guidance on the application of the Public Interest Disclosure Act, which is more commonly known as the “Whistleblower’s Act”.

The object of the legislation is to provide a policy for workers who disclose information covered by the Act (“qualifying disclosure”) outside the Company in cases where they have raised the matter internally and have not had the situation resolved as a result.

Individuals are encouraged to use the internal channels wherever possible rather than to raise it via the Whistle-blower route.

The policy explains the procedure to be followed when making a qualifying disclosure. Legislation protects “Whistleblowers” (colleagues and workers) from unfair dismissal or victimisation where they make a disclosure in the public interest. “Whistleblowers” must follow a lawful procedure.

2. Scope

The scope of this policy is applicable to all colleagues, agency staff, contractors, and consultants.

There is no qualifying period to protection under this policy or the law regarding whistleblowing and is in force from day one of your employment. It is important to note that people are still protected even if they no longer work for the company, they are making a disclosure about.

3. Application of the Legislation

Legislation was introduced which protects colleagues and workers from unfair dismissal or victimisation where they make a disclosure in the public interest and if they follow a lawful procedure.

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The law applies to any permanent colleagues, temporary colleagues, as well as agency, casual or contractor workers.

Any of the following “wrong-doings” which you know or believe to have happened or is currently happening or which you believe is likely to happen, will be covered by the Disclosure Policy; but this is not an exhaustive list:

- Financial or accounting fraud, corruption, bribery, or other financial impropriety.
- Criminal Facilitation of Tax Evasion.
- Significant deficiencies or material weaknesses in the systems of internal controls or any other significant weakness related to auditing or accounting matters which have a material effect on the financial statements.
- Improper use of confidential or commercially sensitive information.
- A conflict of interest or unethical behaviour or malpractice.
- Any suspected breach of the modern slavery policy/statement
- Failure to disclose information or the destruction of documents which should be disclosed to others in the Company or to regulatory or appropriate authorities.
- A criminal offence or failure to comply with legal obligations.
- A breach of the terms of the regulatory licence.
- The health or safety of anyone being endangered or harmed.
- The environment being damaged.
- Failure to comply with policies, procedures, or internal controls.
- The deliberate concealment of information relating to any of the above.
- Any of the foregoing actions committed by a colleague of another company, but whose actions impact on NGN or its colleagues.
- Sexual Harassment of/or by a colleague, agency worker, contractor or any third party.

Exclusions

Not all concerns reported will count as whistleblowing, under the Employment Rights Act 1996, the wrongdoing disclosed must satisfy each of the following criteria:

- a) The complaint must be a ‘qualifying disclosure’ that the whistleblower reasonably believes to be substantially true.
- b) The complaint must be made with a reasonable belief that it is ‘in the public interest’.
- c) The complaint must be made to an appropriate or prescribed person or body, such that it is classed as a ‘protected disclosure’.

4. Safecall – our independent reporting platform

Our aim is to conduct our business activities not only within the law but also with fairness and integrity. NGN acknowledges the legislation and provides a whistle blowing platform to raise issues of concern.

More importantly, it encourages colleagues to raise any concerns internally without fear of any negative reaction.



Our external provider is **Safecall UK**
8th Floor, 100 Bishopgate, London EC2N 4AG.

How to raise a report online via the portal - [Northern Gas Networks - Safecall Ltd](#)

How to raise a report via the phone - **0800 915 1571**

How to raise a report via email – send the full details to: ngn@safecall.co.uk

5. Colleague Guidance

The disclosure procedure has been put in place to enable you to raise issues of concern regarding malpractice or inappropriate behaviour by individuals.

We would strongly recommend using the internal disclosure procedure which is set out below. However, where you believe an external disclosure would be more appropriate you should, or you may wish to, obtain legal advice to check your own legal position regarding your contractual confidentiality obligations to ensure that any disclosure meets the criteria of a qualifying disclosure under the legislation (this is to ensure that you are legally protected by the legislation if you disclose sensitive information as part of the disclosure).

Protection provided by the legislation may be lost where concerns are not raised internally prior to making an external disclosure.

Procedure for making an internal disclosure

- If you wish to raise a concern, the earlier you do so the better; however, no matter when the issue or incident has taken place every matter reported will be treated seriously and sensitively and will be fully investigated.
- In the first instance, you should speak to your Line Manager or Human Resources with the information.
- Whoever you approach, they will take suitable action. If you have reported the matter to your Line Manager or named senior persons and remain concerned that the issue has not been responded to appropriately, you are encouraged to report the matter via the SafeCall Portal (details on page 3).

The internal Disclosure Procedure is not designed to replace the Grievance Procedure which remains a part of your contract of employment. If you have a personal grievance, or any other complaint which is colleague specific, you should proceed under the Grievance Policy.

6. Protection from reprisals

We recognise the sensitivity of raising issues and we undertake to treat details of individuals who report matters with the utmost confidence. This means that your identity will not be disclosed unless it is necessary to do so in connection with the investigation of your disclosure.

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No action will be taken against you for raising genuine complaints, nor will there be any impact on your employment or career prospects as a result of raising disclosures under this policy.

Retaliation or victimisation from any member of the Company because of your disclosure will not be tolerated.

There will also be no tolerance of any attempt by any manager or colleague in the Company to deter an individual from making a disclosure, victimising, or making life difficult for a colleague because of a disclosure.

Please be aware that contractual confidentiality clauses still apply so legal advice should be taken before disclosures are made externally.

7. Manager Guidance

Protection against detrimental treatment is given to whistle-blowers under the Public Interest Disclosure Act 1998 (PIDA), which protects colleagues and workers from unfair dismissal or victimisation where they make a disclosure in the public interest and follow a lawful procedure.

Disclosure Procedure: Managers Implementation Guide

Managers should ensure:-

- That everyone is aware that an internal procedure exists for them to raise issues of concern within the business.
- That the identity of anyone who makes an internal disclosure direct to you should be held in the strictest of confidence (except where they may have to be identified to thoroughly investigate the issue raised).
- That individuals who make a disclosure are not victimised, or their career prospects damaged by making the disclosure.
- Must take down as much information as possible at the time and inform Human Resources of the report, ensuring to pass on all information obtained.
- Provide assistance where required in the feeding back or updating the individual alongside Human Resources.

8. Benefits of the disclosure procedure

We have a disclosure procedure implemented to:

- Reduce the circumstances in which it would be considered reasonable for someone to raise concerns outside of the Company.
- Minimise the risk of adverse external attention from Regulators, Media, Stakeholders etc.

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- Provide an early warning system for any issues of malpractice which require investigation.
- Reinforce to colleagues and workers that the Company operates its businesses in a fair, ethical manner and will not tolerate malpractice of any description.
- Prevent a damaging effect on our credibility with shareholders, customers and suppliers and could potentially impact on safety and job security.

9. Responsibilities

Everyone referred to within the Scope of this policy is required to adhere to its terms and conditions.

Managers are responsible for ensuring that this policy is applied within their own area and know what to do if a disclosure is made to them. As well as ensuring that all colleagues are made fully aware of their right to make a disclosure.

The HR Team/HRD will be responsible for appropriate response being applied to ensure a full investigation takes place when they are made aware of a disclosure.

Any queries on the application or interpretation of this policy may be discussed with Human Resources.

10. Related policies

- Grievance Policy
- Safecall Platform/Service
- Modern Slavery Policy/Statement
- Disciplinary Policy

11. Version Control

Version	Date	Name	Comment
2	20/06/2013	Natalie Debono	Reformatted and Rebranded to maintain consistency across all policies
3	12/12/2013	Carol Roscoe-Smith	Policy Revised as part of HR Audit Report Oct 13
4	01/04/2016	Matt Siddle	Change of number for new provider SafeCall
5	01/05/2019	Dionne Willetts	Updated Branding
6	28/01/2020	Kerry Watson	Facilitation of Tax Evasion
7	01/06/2023	Dionne Willetts	Scheduled review via PRG.
8	13/03/2026	Dionne Willetts	Updated in line with legalisation changes in 2026 for sexual harassment being a protected disclosure.