

Business Ethics Everyday Matters

Code of Business Ethics



Contents

Overview

- 01 CEO's statement – Mark Carne
- 02 Introduction
- 03 How do we know what is right and wrong?
- 03 Speak Out
- 04 How should I deal with safety concerns?
- 05 What is iEthics?
- 05 Who does the Code apply to?
- 06 Our code

The code

- 1. How we work**
 - 08 Safety, health and the environment
 - 09 Outside activities
 - 10 Diversity and inclusion
 - 11 Bullying and harassment
 - 12 Bribery
 - 13 External communications, including social media
- 2. Our delivery partners**
 - 15 Suppliers and contractors
 - 16 Conflicts of interest
 - 17 Gifts & Hospitality
 - 18 Commissions, fees and similar payments
 - 19 Share dealing
 - 20 Customer relationships
- 3. Government, the public and the law**
 - 22 Political contributions
 - 23 Government and regulatory relationships
 - 25 Corporate responsibility
 - 26 Community relations
- 4. Company assets**
 - 28 Using computers
 - 30 Misuse of resources
 - 31 Disposal of company property
 - 32 Company records
 - 34 Disclosure of information
 - 35 Personal information and data protection
 - 36 Contacts

CEO's statement

Mark Carne

Thanks for taking the time to read our code of business ethics.

Our code of business ethics set out the standards of behaviour that everyone working on behalf of companies in the Network Rail Group should adhere to. We exist to run, maintain and operate Britain's railway infrastructure and there is nothing more important than doing this in a safe and responsible way.

Standing alongside our company behaviours - collaborative, challenging, accountable and customer driven - the code helps us to make the right decisions and outlines how we should deal with situations that might be damaging to each other or to Network Rail. It underpins everything that we do and it applies to me just as much as it does to you

Please take time to read the code and understand how it applies to you. If you have concerns, I want you to Speak Out. Breaches of the code will be taken seriously - our reputation and future depends on us all behaving with integrity in everything we do.



Mark Carne
Chief Executive

Introduction

What is business ethics and what does it mean for you?

Business ethics is the set of standards that guide everyone in our company – whether an employee, a contractor or a supplier – so that we all work in an open and honest way to deliver our service. Sometimes that means making difficult decisions; our code is here to help us make the right one.

We all need to behave in a way that matches these high standards. We need to be transparent and honest in all our dealings, whether with our colleagues, our suppliers, customers, passengers or neighbours. We're trusted with significant resources, both financial and physical, by Government and the taxpayer and it's up to each of us to respect this trust and use these resources properly and efficiently.

It's important we don't put loyalty to colleagues above behaving in the right way. There's no place for fraud, bribery, corruption or deception in our company, and we must never seek personal gain at the company's or anyone else's expense.

Got a question? Facing an ethical dilemma?
Get in touch: ethics@networkrail.co.uk

How do we know what's right and wrong?

This document explains how we should behave in a range of situations we may find ourselves in at work, but it can't cover every possible instance. If we're ever unsure about how to do the right thing we should ask ourselves these questions:

- Is it legal?
- What would my family think if I acted in a certain way?
- How would it look to my colleagues and manager if I made a certain decision?
- If it were a story in the papers, how would it portray both me and Network Rail?
- How would I feel if it happened to me?

If answering these questions raises any doubt in your mind, then it's important you have the courage to speak out and let others know.

Speak Out

Speak Out is our confidential reporting service run on our behalf by an independent company. You can use the service to raise concerns about behaviour that might go against our business ethics. The service is available 24 hours a day, 365 days a year. You can access Speak Out by calling 0808 143 0100 or online: www.intouchfeedback.com/networkrail.

Your report will be treated in the strictest confidence and you can remain anonymous if you wish. As long as you have raised your concern honestly, Network Rail policy will protect you from retaliation. For more information see our [Speak Out Policy](#).

How should I deal with safety concerns?

If you have a safety concern, stop work immediately, ensuring that doing so does not endanger others, move to a position of safety and contact the person in charge, explaining why you have stopped the work.

Always report events that had the potential to cause injury or damage using the Close Call system. This way we can learn from our near misses and prevent the same thing happening again.

You can report a Close Call by phoning: 01908 723 500 or through the Close Call App available in the Network Rail App Catalogue.

You can also report your safety concerns through CIRAS, the rail industry's confidential incident reporting system:

Telephone: 0800 410 110

Mobile texting: 07507 285887

Writing: Freepost CIRAS

Web: www.ciras.org.uk

What is iEthics?

iEthics is our online register for logging all gifts and hospitality – whether offered or received – and conflicts of interest. Being open about hospitality and declaring our conflicts of interest can help prevent allegations of bribery. Always ensure that submissions are clear, honest and are an accurate reflection of the gift or hospitality being offered.

iEthics can be found [here](#) or by searching on Connect.

Who does the code apply to?

Everyone in our business must abide by the code of business ethics. We will take any failure to do so seriously and it may result in disciplinary action up to and including dismissal. This code of business ethics does not change your employment contract. Complying with our company policies is a general requirement of your employment by Network Rail. We reserve the right to change this code of business ethics at our discretion.

Our code

We've split our code into four sections to make it easy to find what we're looking for.

It covers:

1. How we work

This section focuses on what we do on a day-to-day basis inside Network Rail, the people we rely upon to get our jobs done, and highlights some of the areas we might find most challenging to deal with.

→ p07

2. Our delivery partners

We rely on lots of other people to help us run the railway, and this section sets out just how we should go about managing these relationships.

→ p14

3. Government, the public and the law

This section covers how we should behave when we deal with law enforcement agencies, the regulator and the general public.

→ p21

4. Company assets

To do our jobs properly, we need the right information and equipment, but we need to make sure we use it, look after it and, where necessary, dispose of it in the right way. This section explains this in more detail.

→ p27

1 How we work

This section focuses on what we do on a day-to-day basis inside Network Rail, the people we rely upon to get our jobs done, and highlights some of the areas we might find most challenging to deal with.



Safety, health and the environment

? One of your colleagues regularly calls in sick on a Monday, disappears at lunchtime and makes mistakes at work. He insists that he is fine, but you're worried he has an alcohol problem. Is it any of your business?

i Yes, it is your business! His problem could not only harm him but a mistake at work could hurt his colleagues, or even passengers or the public. If he won't talk to his manager, then you should talk to yours, or to HR.

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

i Safety is vital to all of us, everywhere, every day at Network Rail. Something that might seem minor to you could be dangerous to others or could result in a serious accident. Always report things via Close Call, even if they seem trivial, so they can be put right.

We're committed to getting everyone home safely, every day.

This means we all have a duty to work in the safest way possible 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 Life Saving Rules no matter if you are working on the track, or in the office.

This duty extends to how we look after the environment, so we do everything we can to reduce the impact of our work on the communities and locations in which we work.



Outside activities

We've all got interests and commitments outside work, but sometimes these might be at odds with what we do at Network Rail.

To avoid this, we should always discuss the situation with our line manager before we take up a second job, consultancy, part-time or freelance activities. Always ensure that the outside activity doesn't:

- Interfere with our ability to fulfil our responsibilities
- Use knowledge gained at Network Rail to benefit an outside party
- Put anyone in a position where there could be a conflict between personal interests and those of Network Rail.

If the activity causes or even appears to cause a conflict of interest, or if it is a senior position, you should declare it on iEthics and await approval before you accept it.

If you think the activity and your day job combined will take you more than 48 hours a week averaged over 17 weeks, you need to complete the Working Hours Opt Out form to comply with the EU Working Time Regulations.

For further guidance, see the [Conflicts of Interest and Outside Activities Policy](#).



You have been approached by a friend who is a local supplier to Network Rail to work with him for a few hours here and there. Should you do this?



Probably not. Generally speaking, it's not acceptable to use knowledge or expertise you've gained as a result of working for Network Rail to help another business, particularly actual or potential suppliers, contractors or customers of the company. A discussion with your manager is the best way of establishing how to deal with offers like this.

In all cases, it is very important that you get approval before you accept a position so that you are comfortable that there is no clash of interests. And if you are challenged, you'll be in a better position to respond.



Diversity and Inclusion

? A member of your team asks if he can change his working hours during Ramadan so that he doesn't take lunch or tea breaks and can leave early. What approach do you take?

i Have a full discussion with him about what he needs and balance your response with the needs of the team or function. If there is no adverse impact, then yes. If you're not sure then contact HR direct.

We want Network Rail to be an open, diverse and inclusive organisation.

This means that we expect all our people to treat each other, members of the public, our stakeholders and partners with respect. A respectful and open environment is comfortable with difference whatever it may be – a colleague's identity, their experience or expertise. We also want everyone who works with Network Rail to be able to give their best. This requires an inclusive supportive team working approach, being flexible and open. These ethics are supported by legislation and in particular the Equality Act 2010. Our [Diversity and Inclusion Policy](#) describes in more detail everyone's responsibilities for making sure we promote fairness in all that we do.

Bullying and harassment

Harassment of anyone particularly on the grounds of race, age, religion, colour, nationality, ethnic origin, disability, gender, sexual orientation, marriage or civil partnership, including any form of bullying – is completely unacceptable.

We won't tolerate it and we urge everyone in the business to report this type of behaviour, either through the line management structure or through HR or Speak Out. We know that it takes honesty and courage, but it's important. This is covered in more detail in our [Harassment Policy](#).

 A colleague frequently makes jokes and uses language that offends and upsets you. No one else in your team seems to mind and you're worried about how people would react if you said something. What do you do?

 Everyone should feel comfortable at work and we need to deal quickly and decisively with situations where this isn't the case. If you don't feel comfortable talking to the person whose behaviour is offending you, talk to your manager. He or she will listen to your concerns and take steps to address them. If he or she doesn't, then contact your local HR representative or call Speak Out.



Bribery

? You have notified some local residents that you are doing work at night. One of them offers you and your team a few crates of beer to get it re-scheduled to take place when they're on holiday. What do you do?

i Apart from the obvious difficulties of getting the work moved, you should never accept a bribe from anyone, no matter who they are or what position of power or influence that they seem to hold. It is illegal and you could be guilty of a criminal offence. Report this to your line manager or use the Speak Out line.

? You are managing the letting of a new contract to replace some vehicles for your maintenance teams in the route. One of our preferred suppliers sends you a case of fine wine to your home – what should you do?

i There are several things that you need to do. Firstly, you record this on the iEthics system so that you have registered that you have been sent this gift. Secondly you must return the gift to the supplier – you should not accept any such presents as it may be seen as an inducement or a bribe and we must always act equitably with all suppliers during the tendering of a contract.

Bribery means trying to influence a business decision or making it easier to do a piece of work by offering or receiving cash, gifts or other incentives, either directly or through someone else.

It could apply to anything we do – from awarding a contract to dealing with government officials – and includes facilitation payments. This type of behaviour is absolutely unacceptable within Network Rail, and under the terms of the Bribery Act 2010 is also illegal.

From time to time we work abroad. That doesn't change our position on bribery – we're bound by UK laws and must abide by them wherever we operate.

See our Anti-bribery Policy for more information.

External communications, including social media

We rely on our good reputation to maintain the trust of government, customers and passengers.

We're committed to being open, transparent and sharing key information with them. That means we always think about what we say and choose the most appropriate channels to say it.

If any of us is contacted by the media or other external organisations, it's important we pass the contact on to our Communications team who can deal with it in the right way. This includes requests to speak at external conferences and seminars.

Social media, such as Facebook and Twitter, are increasingly used to communicate, discuss and disseminate information, and we have a team whose job it is to manage and use them 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 social media in a personal capacity, always ensure that it is clear that your comments are your own and not those of Network Rail and never bring the company into disrepute. For more guidance on using social media responsibly, see our [Social Media Policy](#).

There has been a lot in the news about cable theft, and it's making lots of work for you and your team. A local journalist you know from school sees you in the pub one evening and asks you about it. What do you tell her?

i We all know that cable theft is a huge problem that costs the country millions of pounds. But even a 'friendly' journalist might not understand the full picture. If she wants to know the story, give her the contact details of Network Rail's media relations team: mediarelations@networkrail.com or phone 020 3356 8700.

>Your team had fun filming a few harmless stunts with an RRV. You uploaded it to YouTube and Tweeted about it. It wasn't on the live running railway and no-one was in danger, so is it OK?

i Unauthorised acts with heavy plant are completely unacceptable. What might look like harmless fun to you could be viewed as abuse of public funds or property, or as dangerous to you and the users of the network. Millions of people use websites like Twitter and YouTube – don't do or post anything that might harm Network Rail's reputation or your own.

2 Our delivery partners

We rely on lots of other people to help us run the railway, and this section sets out just how we should go about managing these relationships.



Suppliers and contractors

Our suppliers and contractors play a crucial role in helping us maintain, operate and enhance the rail network and service our customers.

We have to choose them carefully. We also expect them to act in accordance with this code.

When we're selecting contractors or suppliers we need to be clear that:

- All contractors and suppliers are chosen solely on merit
- We don't give or accept gifts
- Any hospitality we receive must be consistent with our policies on corporate hospitality
- We don't pass on any confidential information about another contractor or supplier, for example pricing or bid information
- We comply with any rules that apply specifically to a particular area of the business.

If any of us becomes aware of a supplier who either isn't being treated in line with these guidelines or are themselves breaking the rules, then it's essential we either report it to our line manager or use Speak Out.

 You have to get a job done very quickly and you've worked with a certain supplier before so you know they can do it for you. They aren't on the approved supplier list for this kind of project, but to wait for this would delay the job unreasonably. What do you do?

 *We all have to be seen to be acting fairly towards our suppliers and contractors, and that's why we have rules for awarding jobs. Stick to these rules and, if you need to, talk to your manager about any timescale difficulties.*

Conflicts of interest

 Your partner has recently begun working for a local supplier to Network Rail, but because he/she left the previous job for health reasons, doesn't want this widely known. Is this OK?

 It may be fine for your partner to work for the supplier, but you do need to be completely open about it, because people might think you have something to hide if you aren't. Use the iEthics tool on Connect to report it and talk to your manager.

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.

No-one associated with the company should be involved in a transaction from which they or anyone linked to them benefits, but we also need to think about how things might look even if this isn't the case.

Being aware of the issues associated with conflicts of interest is particularly important if a partner or relation works in the rail industry, or for a supplier or customer. There may not be a problem, but it's important we're open, tell our manager and add an entry to the iEthics system if we have any relationship, either business or personal, that could create, or appear to create, a conflict of interest. iEthics can be found [here](#) or by searching on Connect.

For further guidance, see the [Conflicts of Interest and Outside Activities Policy](#).



Gifts & Hospitality

To maintain our reputation for honesty and openness, it's important that we neither give nor receive entertainment.

Hospitality is only appropriate where it's necessary for the development of legitimate business relationships, should always be modest, and must be recorded and approved through iEthics before it's given or received. Not handling situations in this way could make the hospitality – almost certainly wrongly – look like an attempt to influence decisions and in some instances, could even be seen as a bribe.

One of the key parts of our [Gifts & Hospitality Policy](#) is that we record all invitations of hospitality using our iEthics system, whether we accept them or not. This is important because it enables our Legal Services and Internal Audit teams to monitor and track any attempts to influence our decisions. iEthics can be found by searching on Connect.

For information on buying gifts for colleagues to mark special occasions or claiming expenses, see our [Business Expenses and Travel Policy](#).

You work closely with a local supplier who has given you and your family tickets to a charity event. Is it OK to go?

If you are accepting hospitality or gifts, people might misinterpret this as being in return for awarding jobs or buying materials and you could get into trouble – even if it looks like it's for a good cause. Always report any offer on iEthics and check the [Gifts & Hospitality Policy](#) but you should not, as a general rule, accept any hospitality from any supplier.

Commissions, fees and similar payments

 A supplier has recently finished a piece of work for you and you are delighted with what they have done. You tell them to invoice for a couple of weeks additional work, in recognition of this – surely this can't hurt?

 *We should only pay suppliers for the work that they have actually carried out for us. Remember that we are funded by the tax payer and have a responsibility to use the resources we're entrusted with wisely. If we are seen to be overpaying suppliers for work, then this could set a precedent and lead to an expectation of how we deal with the market.*

We only pay commissions, consultants' fees and retainers that are directly related to the services a third party has carried out for us.

We never make payments, loans or offer commissions that are unrelated or disproportionate to the work we've received.

Share dealing

As a ‘not for dividend’ company, Network Rail doesn’t have any shares.

However we frequently work with other businesses which *are* listed on stock exchanges. If these businesses win or lose a contract with us then it may affect their share price. It’s against the law for any of us to pass on, use or act on unpublished, price-sensitive information for dealing in shares or securities in such organisations. This ‘insider dealing’ is a criminal offence and could mean a fine and/or prison sentence, even if the individuals involved don’t profit personally.

Our [Code on Share Dealing](#) provides more information.

Because of the project you work on you know about the awarding of a big contract with a supplier. Surely it’s OK to buy or sell a few shares, after all, it is never going to upset the markets?

 *Trading shares, no matter how many, based on unpublished price-sensitive information is illegal, no matter what the impact is on the markets. If you are unsure, please contact Legal Services.*

Customer relationships

 It's a waste for us to give smaller train operators much information and time when they are bidding for access to the infrastructure. After all, when they're up against the big boys, everyone knows they don't stand a chance of winning the franchise, don't they?

 We manage the rail infrastructure, but it's not for us to decide who has access to use it. We must treat everyone equally and fairly if they are seeking access to use the rail network, no matter what people think they 'know' about their likely success. We should deal with all of our customers, or potential customers, equitably, fairly and equally.

Our customers are important to us and we're committed to working closely with them, for example through building alliances and by developing joint performance improvement plans.

It's essential we conduct these relationships in an open and honest way. When we agree terms of service with a customer, it's our duty to deliver the services we've said we would, to the highest standard.

As a 'monopoly provider' we're in a unique position in the rail industry, one that brings extra responsibilities. We need to act fairly, and be seen to act fairly, to all our customers, suppliers, contractors and other stakeholders. Our commitment to the principles of fair treatment for all is outlined in our [Stakeholder Relations Code of Practice](#).

Each of us has a personal responsibility to abide by this code in an open, honest way. If you're unsure about how to treat a customer or third party then contact stakeholderrelations@networkrail.co.uk or your usual contact within Legal Services.

3 Government, the public and the law

This section covers how we should behave when we deal with law enforcement agencies, the regulator and the general public.



Political contributions

? Your father is standing for the local council and wants to use a Network Rail office for a meeting for his supporters. It's not in use in the evening so you don't see a problem with that.

i No. Network Rail must be politically neutral and never appear to be supporting any one party or individual over another. Although the office might be empty, using it might be seen to be endorsing the activities that are being carried out there so this is not appropriate. There are also insurance and security issues that need to be considered here.

We've all got our own views on politics and political parties.

At Network Rail, we regularly meet with MPs and others from the major parties to explain what we're doing and the issues we face. That's as far as contact goes; we never make any contributions and we don't endorse Network Rail staff making any form of political donation or contribution on our behalf.



Government and regulatory relationships

We have working relationships with many government bodies, such as the Department for Transport, the ORR, the British Transport Police and other agencies.

The nature of these relationships and the importance of many of the issues they are involved in make it vital that they're open, ethical and entirely within the law.

Unlawful or unethical business dealings with these agencies, such as receiving or making payments, are totally unacceptable and could lead to a criminal prosecution. From time to time, we need to assist government officials or law enforcement agents in their work. When doing so, we should:

Always

- Co-operate fully, and in a courteous professional manner and as fully as the law allows
- Ensure the right people in Network Rail, for example senior managers, Legal Services, or Communications are made aware of what is happening
- Be as sure as you reasonably can that any information you provide, whether in person or in writing is accurate and as comprehensive as necessary to fully satisfy the terms of the request for assistance

?

You are asked to talk to an accident investigation team from the ORR. You know that something that had been reported previously to a manager was not acted on and this might have been the problem. What do you do?

?

You should speak to your line manager about this before you speak to the ORR so that the matter has been raised within Network Rail. If you are not satisfied that they take this seriously, then speak to the Legal Services team who should be able to help you. If you are still unhappy, then use the Speak Out line. Irrespective, you should provide an honest and comprehensive version of events to ORR.

- Take steps to ensure that copies of all relevant documents requested are kept somewhere readily accessible to you and others
- Get an itemised written record of any documents provided to third parties

Never

- Ignore or put to one side requests for help or information
- Give information which may be incorrect or which may be misinterpreted
- Act in a manner which could appear to obstruct an investigation
- Destroy documents or records which may be required in the course of an investigation or legal proceedings.

Being asked to co-operate with an investigation can be a stressful and worrying experience. Do not feel pressured into doing something you are not sure about. If you are in any doubt about what to do speak to our Legal Services team who will be able to give you advice.



Corporate responsibility

We're working hard to become a more responsible and sustainable company.

This means addressing the impact our work has on our workplaces, railway stations, passengers, the communities we operate in, our supply chain and the environment. It's essential we all play our part in meeting our corporate responsibility commitments and help our stakeholders to meet theirs.

 You are approached by a local hospital which needs a donation to help buy a new scanner for their oncology department. You know lots of people who have been helped there and are keen to help so you get a cheque raised for them – surely that's great PR for us?

 As one of the biggest organisations in the country, we are approached by all sorts of different charities and worthwhile causes. However we can't help all of them, which is why we've developed a charities policy. This is handled centrally by the Corporate Responsibility team so you need to pass any such requests on to them to deal with.

There are lots of ways that we can help you support charities that are close to your heart, such as Give As You Earn. However, our funds are limited so we are very careful in choosing which charities we help.



Community relations

? Your team is waiting at an access point before entering the railway under a possession at night. While waiting to get on with the job, the team is having a bit of banter and a laugh – that's not a bad thing is it?

i Of course not, it's great that the team is getting on so well. We do need to be mindful that we are working in our neighbour's communities. When we're working during unsociable hours, we should keep any unnecessary noise to a minimum and make sure that any litter or mess we create is cleared at the end of every shift. Whilst we may be working on our own property, the noise, litter and visual condition of the railway can cause great concern to local communities.

? Planned works require the removal of trees and vegetation from beside the railway. This is situated in a residential area with houses backing on to the railway line. As we are removing trees for operational reasons, we do not have to consult anyone do we?

i It depends. The removal of trees and impact that we can have on the local railway environment can be a very sensitive issue to local residents and political stakeholders. Reaction to tree felling or vegetation management can result in high-level political campaigns and force us to stop work. We can manage this risk by informing local authorities and residents before we start. The Community Relations team can help you do this so contact them before undertaking this kind of work.

We try hard to be a good neighbour by working with communities to minimise the effect of our work.

That means aiming to cut noise, reduce disturbance caused by deliveries to our sites and take care of issues like graffiti, trespassing or fly tipping on our property.

How well we do this directly affects our reputation. 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.

4 Company assets

To do our jobs properly, we need the right information and equipment, but we need to make sure we use it, look after it and, where necessary, dispose of it in the right way. This section explains this in more detail.

Using computers

 You need to send an important email with an attachment but you're away from any computers. A colleague is going back to base early, so you give him your password and ask him to attach it and send the file for you. Is this OK?

 No. You may have files on your computer that contain other people's personal information, or sensitive documents so you should not allow anyone else, no matter how much you trust them, to access this. If only you know your password, you reduce the risk to yourself of anything inappropriate or illegal happening to the computer or the information it contains.

Our electronic data and computer systems are a vital part of our business.

It's important we use them both in the right way and for the right purposes. Here's how:

a) ***Emails***

All email correspondence sent or received through our systems must comply with the law and our own standards and rules. To find out more and to understand how we can all help protect company data read our Information Security policy. Please be aware that emails should always be considered private, and should be treated in the same way as a letter on company paper. You should assume that even once deleted it can and will be recovered if necessary.

b) ***Unauthorised use of licensed material***

Never use our systems to download or disseminate unlicensed material, such as a copyrighted picture for use in a presentation.

c) ***Passwords***

Never share your passwords with anyone, including colleagues; and always lock your computer when you're away from it, even for a short period of time.

- d) ***Inappropriate or offensive material***
Never access inappropriate or offensive material using our systems.

- e) ***Loading and using unauthorised software***

Generally speaking, we should only use the systems and programmes provided by our technical support teams. Users of Network Rail iPads and iPhones are allowed to download content only from iTunes or the corporate app store, and should take care not to import anything which could damage the device or the network.

For more information see our [Information Security Policy](#).

Misuse of resources

 You are driving in the Network Rail van to pick up lunch for the crew. You see your children walking home for lunch. You stop and pick them up – you're going past your door anyway. Is this OK?

 Vans, or any other equipment or property are only for Network Rail use so we should only be using them to transport our people or goods. They should never be used for personal reasons. Additionally, there may also be insurance or safety risks in using them for non-work purposes.

As a large business we have many valuable assets ranging from materials, property, plant and equipment, through to computer systems, information and job-specific knowledge.

It goes without saying that we should look after these so they're not misused. That means never using our resources for anything other than authorised and legitimate work. Using company resources for personal gain or for any illegal purpose is not permitted.



Disposal of company property

How we dispose of our company property is just as important as how we look after it.

It's therefore essential we dispose of materials, property, plant and equipment, computer systems, trade secrets and confidential information in the right way and with the correct authority. Our Disposal Policy outlines what you should do.

Some wood left over from a job has been left in a skip at the depot. You have a wood-burning stove at home and hate to see this go to waste. What do you do?

i Don't take it. It's Network Rail property and should therefore be disposed of responsibly, following the right procedures. If you're concerned, ask your manager about the policy.

It's your turn to organise the Christmas party. In past years the team has sold scrap cable and metal to fund the festivities. Should you do this?

i No. The scrap belongs to Network Rail, not the depot, the team or you. You should not sell it for your own, or your team's gain, even if that's the way it's always been done. We also have big problems with cable and other materials being stolen and sold as 'scrap', so activities like this could make finding the culprits more difficult.

Company records

? Your team is moving to another office so it's time to streamline the documents you and your team have collected and get rid of what you don't need. Your manager tells you that it's simply a case of going through all your cupboards and throwing away anything you haven't looked at for the last six months. What do you do?

i Before you throw anything away, read the *Quick Guide to Disposal of Records* so that you are clear on what you should and shouldn't throw away. It's also worth talking to your manager about the policy and telling the rest of your team about it, so that everyone understands what can be disposed of.

Information is one of the most important assets we have.

Good record keeping is a key part of our ability to operate effectively and retain 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 significant amount in fines and penalties. It could also make it harder for us to find what we need when we need it, which in turn impacts on our ability to do our job and provide a high level of service. Here's what we need to consider:

a) Accuracy of information

We need accurate information so we can run a successful business and fulfil our legal and regulatory duties. We all have a role to play in keeping records accurate and up to date. We must never falsify records or misrepresent facts – if you think that's happened, then speak to your line manager or use Speak Out to let others know.

b) Retaining information

Whether because it's best practice, or because the law says so, we need to keep information about how every part of the company operates. Our Corporate Records Retention Schedule lists the categories into which this information falls – talk to the National Records Group if you need advice on whether the information you create ought to be kept for an extended period of time.

c) Destroying information

We generate an enormous amount of information every day, both electronically and in hard copy and we cannot keep it all. Holding onto more than we need to costs money and makes it harder to find what we genuinely need. So we should regularly purge our paper and electronic records of ephemera, duplicates, and anything else expected to have a short lifespan. If you scan and save something, you don't need to keep the paper record too. In all instances, make sure you get the agreement of the owner of information before doing anything and ensure that where necessary destruction is done securely.

Disclosure of information

 A train enthusiast is building a website of the history of Brunel's Great Western Railway and approaches you to find out where he can get copies of the original drawings. What do you do?

 You need to speak to our records archive, based in York, to find out whether it would be appropriate to share this information. Our archivist understands the legal and copyright issues that would apply in this case.

The movement of information around the company helps it run efficiently.

Of course we need to respect personal and commercial confidences when handling information, but as a general rule we should make sure it's available to as many people as possible. If you're unsure how to handle a particular document, speak to your line manager.

For a variety of reasons, the public, our delivery partners and the media may want us to release our information to them. In these cases, we must be completely sure that disclosure wouldn't harm the company or anyone else, and get the express agreement of a senior manager before supplying anything. Even if we're unable to provide precisely what's been requested, consider whether we could release some of it, something similar, or even arrange for the requester to talk to the most appropriate person in that area within Network Rail.



Personal information and data protection

In the course of running the company, we collect and use personal data about our employees (whether current, past or prospective), members of the public, contractors, suppliers and others.

In doing this, we're required to comply with the Data Protection Act, the breach of which will damage our reputation and could result in a large fine. If you handle information relating to other individuals on a regular basis, please familiarise yourself with our [Data Protection Policy](#).

? You are recruiting a new team member and have been sent some CVs to review before inviting people in for interview. You print them off but forget to pick them up – it doesn't matter though, because it's only relevant to you.

i Yes it does matter. CVs contain all sorts of personal information about people that we should respect and keep private, including their contact details, experience levels and, sometimes, their salaries. You should not leave these kinds of documents lying around on printers or your desk. When you've finished with them, take care to dispose of them using our confidential bins and within a timely fashion.

Contacts

Our code of business ethics is owned by Mark Farrow, Head of Transparency and Business Ethics within our Legal Services team. If you've any questions about the content of this code or how to use it then don't hesitate to get in touch. You can contact the Senior Ethics Officer at: ethics@networkrail.co.uk.

Our internal audit team investigates suspected breaches of this code. To guarantee impartiality this team is effectively independent from the rest of Network Rail. You can contact our internal audit team, who is led by Rajiv Patel, at:

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