



# The NDA's speak up policy

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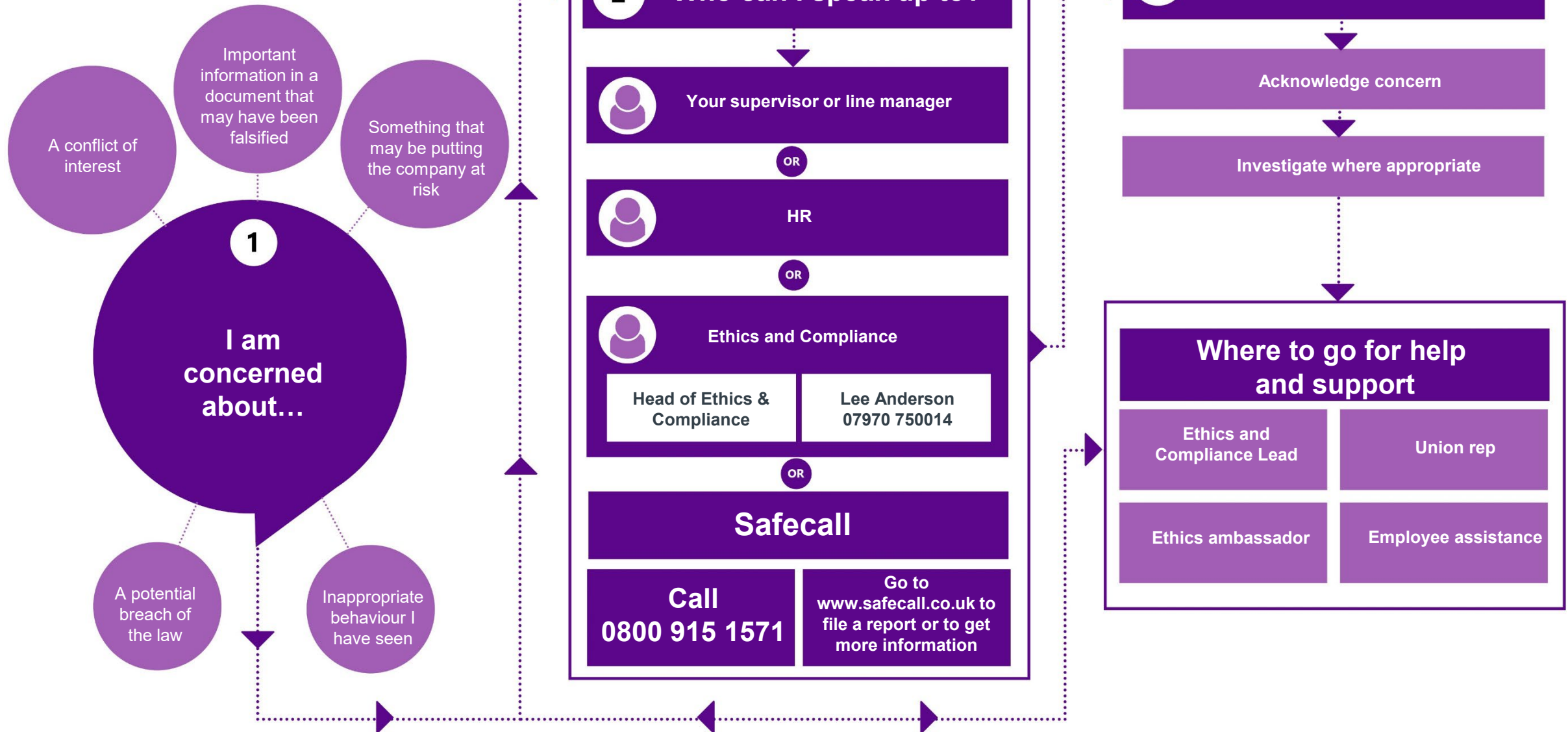
## Speak up at the NDA

Speaking up is about raising concerns on things you think aren't right or are worried about, without fear that you will be mistreated because you have spoken up. By being open and doing the right thing we will create a more positive, ethical working culture for everyone. Taking a personal responsibility for speaking up is part of what we expect from everyone, and leaders have a particular responsibility to promote speaking up and create an environment where it is safe for everyone to do so.

Here at the NDA, we want you to feel safe to speak up and want to hear about any concerns you have. By speaking up, you'll help us to identify opportunities to put things right or make improvements that we might not otherwise know about, making working here better for you and our colleagues.

We're committed to helping people from all areas of NDA access this policy. We will not tolerate anyone being prevented or deterred from speaking up or being mistreated because they have spoken up. Any suggestion of retaliation against individuals who speak up will be taken very seriously. It's important we all feel safe and confident to speak up and that we take the time to really listen.

# Speak up examples



# Our policy

The NDA's group Ethics Policy Statement sets out the shared commitment of each part of the NDA group to delivering the mission ethically. This includes creating an environment where everyone is valued, respected, included, and feels comfortable raising concerns and speaking up. In line with this, all NDA group operating companies have a consistent policy on speak up.

The aim of the policy is to ensure all concerns raised are captured, considered, and dealt with appropriately. It will also help us to learn from the matters that are raised so that we can improve how NDA operates as part of our vision to create great places to work. It is not part of your employment contract; we will review it regularly and may update it.

## Who is this policy for?

This policy is for everyone who works here, including permanent employees, agency supplied workers, secondees and graduates. It explains how you can raise concerns and what happens if you do.

If you work for one of our suppliers or engage with NDA in any way, you can also report concerns in accordance with this policy. You can access Safecall, our independent, confidential platform for raising concerns, using the details below.





# What can I speak up about?

You can speak up about anything that gets in the way of delivering our mission, affects your working life or where you are concerned NDA or its representatives haven't done the right thing or gone about something in the right way. That could be something which simply doesn't feel right to you.

## **Some examples that may fall under this policy include:**

- You suspect that there has been a breach of the law, e.g., bribery, corruption, fraud, or the facilitation of tax evasion which is not being addressed.
- You are worried that a person's personal interests have conflicted with their professional duties, e.g., where a contract has been awarded to an organisation which a person involved in the process has a personal connection to, and you are concerned this might not have been properly disclosed and considered.

- You are concerned that someone has falsified (i.e., deliberately changed or left out) important information in a document.
- You see something happening or become aware of a practice that you are concerned may be dangerous or putting the organisation or our people at risk.
- You witness inappropriate behaviour such as bullying, harassment or discrimination towards a colleague.

Some issues may be appropriately considered under other policies or processes for example the grievance or respect at work policy. If you raise something as a speak up that is better dealt with under another policy or process, we will help redirect it. It's important that you do have a reasonable belief in the truth of what you raise, but you do not have to be certain.

## **This is not usually the right policy to use for:**

- Concerns about immediate threats to life, safety or property which should be raised directly with local site management or following your site's emergency response plans.
- Concerns about treatment you have personally experienced in the course of your employment which is normally better dealt with under the respect at work or grievance policy.

If you are in any doubt, please speak up.

# Who can I speak up to?

## Within the NDA

Speaking up sometimes happens informally through conversations with supervisors and line managers where questions, suggestions and challenges are raised and resolved quickly, and help is sought where needed. We strive for this to be a normal, everyday practice and encourage you to explore this option. It may well be the simplest and easiest way of resolving matters.

However, you have other options in terms of who you can speak up to depending on what feels most appropriate to you and the type of matter it is, and we'd encourage you to use one of these options to give us the best chance to act and resolve matters:

- Your supervisor or line manager
- HR/other relevant function
- The Head of Ethics & Compliance

If your concern involves the Group Chief Ethics & Compliance Officer you may take it to the Chair of the Audit & Risk Committee or use Safecall.

## Safecall

The NDA group uses Safecall, an impartial service for individuals who wish to report any matter of concern they feel cannot be reported using another internal method for whatever reason. Safecall will then notify the Head of Ethics & Compliance of your concerns – they do not investigate them. It is possible to remain anonymous if you use this route. You can contact Safecall by telephone on 0800 915 1571, or via the Safecall website ([www.safecall.co.uk](http://www.safecall.co.uk)). Details of how Safecall deals with concerns can be found in the speak up policy Q and A document.

## Externally

We would always encourage you to use the options above, at least in the first instance.

However, there may be exceptional times when you feel it's most appropriate to raise an issue externally to a regulator or relevant professional body.

External to NDA group, a list of the relevant people and organisations for this purpose and the areas for which they are responsible is available [here](#).

# How should I speak up?

You can speak up to any of the people or organisations listed above in person, by phone or in writing (including email). In all circumstances, please be ready to explain as fully as you can the information and circumstances that prompted you to speak up.

# What happens when I speak up?

Every concern is considered, and a decision is made about whether an investigation is needed, another policy or process is more appropriate to deal with the issue, or whether another method of resolving the concern is more appropriate. What you can expect to happen after speaking up is shown in the 'Communicating with you' and 'How we learn from speak up' sections of this policy, and in the speak up Q and A document. The 'Confidentiality' section of the policy below explains our commitment to treating concerns with a high standard of confidentiality.

Where an investigation is needed, this will be objective and conducted by someone who is suitably independent (this will typically be someone from within our organisation but it might be someone from a different part of the NDA group or, when required, someone external) with appropriate training. The type of investigation and length of time to resolve will very much depend on the issue raised but will normally be completed within 12 weeks.

A speak up investigation is not a disciplinary investigation, and any disciplinary matters arising would be considered separately under NDA Disciplinary Policy.

# Confidentiality

We understand you may have concerns about who will know that you have spoken up, and this information will always be treated on a strictly need to know basis by the person you speak to. If you do not wish to be identified, we will take steps to protect your identity as the person who has spoken up, (although in limited circumstances it may not always be possible). More information about this can be found in the speak up Q&A document. The only way you can guarantee anonymity is to use Safecall.

If we know who is raising the concern, it makes it much more likely that we will be able to get to the bottom of your concern, as we are able to ask you for clarifications, and further information and also provide you with help and support. We'll also be able to provide some feedback on the outcome.

Although it is possible for us to ask for clarifications and provide feedback if you raise the concern anonymously through Safecall (using the messaging facility), what we are able to provide will likely be more limited.

The person managing your concern will take steps to ensure that your concern will only be shared with others, on a strictly need-to-know basis. If you are concerned about how your data will be used and processed, please refer to NDA's data privacy policy and employee privacy notice.

# Non-retaliation

We will protect any person who reports a concern which they believe to be genuine, or assists with an investigation, from retaliation for having done so. We set expectations through training and communications that there will not be retaliation by anyone against those who speak up and will deal with any instances of this by taking disciplinary action if appropriate to protect those who do the right thing by speaking up.



# Communicating with you

We will always treat you with respect and will thank you for speaking up.

Exactly how and to what extent we communicate with you or involve you in the process to consider the issue you have raised will depend on what the issue is and how it is taken forward, but we'll let you know what to expect.

In all cases we will discuss the issues with you to ensure we understand exactly what you are worried about. We will also let you know once a matter is resolved. If we decide to investigate, we will tell you how long we expect the investigation to take and will update you if this timescale changes. We will always give you feedback so that you can see that the issue you raised has been considered and that action has been taken where appropriate. If you only raise the issue anonymously, it will limit the amount of communication we are able to provide.

## How we learn from speaking up

Making sure we learn from the matters our people have spoken up about is critical to help us make improvements to what we do and the environment we work in. Where improvements that can be made are identified, we will ensure necessary changes are made, and are working effectively. Where appropriate and subject to confidentiality considerations, lessons will be shared with teams across the organisation, or more widely.

We will seek feedback from you about your experiences of speaking up. We will review the effectiveness of this policy and our local process every three years (more frequently if needed), with the outcome published and changes made as appropriate.

# Advice and support

We know that speaking up is not always easy, and depending on the issue, you may need advice and support. You can always ask for advice and support from the Head of Ethics & Compliance, from your union representative or local Ethics Ambassador, or the Employee Assistance Programme. Other options available are listed in the speak up policy Q and A document.