

**Electricity  
north west**

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# Ethics in our business

April 2023

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At Electricity North West, we have a diverse and talented workforce, who are proud to safely provide an affordable, reliable and sustainable network to our customers and are committed to doing the right thing at work and in our communities, acting with honesty, integrity and trust in everything they do.

We expect all colleagues and contractors to act in the best interests for our business and this includes how we treat each other, our communities and our environment. By working together with integrity, we can achieve exceptional results.

This document exists to help everyone understand what doing the right thing means in Electricity North West. Our Ethical Framework is central to this and we expect all those who work on Electricity North West's behalf to adhere to these expectations as set out on page 3. Any failure to do so will be taken seriously.

It's important that we all take time to check our decisions are lawful, in line with our Ethical Framework and any risk is effectively managed. We also need to ensure that our decisions remain credible in the eyes of our customers and stakeholders and our Ethics Guide is intended to help us ensure this remains true.

Society's expectations around what it means to act ethically continue to evolve and we are committed to learning and growing as part of this. If you think we could do something better or are concerned that our Ethical Framework is not being followed, then you are encouraged to Speak Up so we can address those concerns. Our Speak Up Policy sets out our approach for how colleagues and those we work with can raise concerns. We are committed to ensuring that genuine concerns raised are addressed effectively and colleagues will not be disadvantaged for having the courage to Speak Up. We will protect our colleagues who raise legitimate concerns from detrimental treatment as Speaking Up allows us to learn, improve and address any potential issues before they can escalate.

We will continue to keep this document under review in light of our experiences and update as appropriate.

This document was approved by our Board in November 2021. If you have any comments, questions or concerns about our approach, please contact the Head of Governance Services in the first instance.

## Our Ethical Framework

We want Electricity North West to be a great place to work, where everyone is able to succeed, do the right thing, ask questions where we are unsure about something and continually improve.

This Ethical Framework is intended to help us all understand what we can expect from each other. It's about how we, as representatives of Electricity North West, act and behave so that we can continue to act in a way that is in line with our customers' expectations of us.

### As Electricity North West colleagues, we will always:

- Act with honesty, take accountability for our own actions and have integrity in our conduct
- Carry out our business activities in line with Electricity North West's Purpose and Principles and the spirit of all applicable laws and regulations
- Treat people with dignity and respect, embracing equality and diversity, and seeking to create a positive and inclusive workplace
- Positively engage with performance management activities, promoting individual development and a high standard of performance
- Challenge behaviours that are not in line with Electricity North West's policies and guidance, as well as welcoming questions and opportunities to grow and improve together
- Raise concerns if something doesn't seem appropriate or makes you feel uncomfortable
- Take all concerns raised seriously and investigate thoroughly and fairly, supporting colleagues who raise concerns or Speak Up
- Challenge any form of discrimination which disadvantages a colleague, customer or member of our community
- Cooperate fully with any investigation, internally or externally
- Seek advice if you are unsure how to act in any situation and encourage others to do the same.

### When you are acting as a third party on Electricity North West's behalf, we expect you to:

- Ensure that you and any of your colleagues working on Electricity North West's behalf act in line with this and any relevant policies and guidance as advised by Electricity North West
- Carry out your business activities on behalf of Electricity North West in line with Electricity North West's Purpose and Principles and the spirit of all applicable laws and regulations
- Encourage your colleagues to raise any concerns and, where appropriate, bring these to Electricity North West's attention in a timely manner
- Cooperate fully with any investigation, internally or externally
- Stop anybody from working on Electricity North West's behalf if there is reason to believe they have acted in a manner that is in breach of Electricity North West's policies and guidance.

## Our Ethics Guide

We have all encountered situations where we've been unsure on the most appropriate action. The purpose of Our Ethics Guide is to support Our Ethical Framework by providing advice and guidance to assist individuals, and their line managers, on how to proceed in uncertain situations. By its very nature, it cannot cover every circumstance and colleagues are encouraged to seek advice if questions remain.

This guide is provided for those employed by Electricity North West, in the first instance, but may also be shared with organisations working on our behalf to ensure a common approach to ethical matters.

## Facing a dilemma

A dilemma is a situation when the most appropriate action to take is unclear, and the alternatives may feel equally undesirable or also be unclear.

The questions below can help guide you to doing the right thing, which may include seeking help and guidance:

- Is it compliant with the applicable law, regulation, policy or guidance?
- Is it in line with Our Ethical Framework?
- Is it in line with our customers' expectations of how we will act?
- Would I be comfortable if my decision was made public or I had to discuss it with senior management?
- Can any potential risk be managed to an acceptable level?

If your answer is 'Yes', then it looks like a good decision. If you have any remaining doubts or questions, then don't hesitate to discuss these with a trusted colleague or your line manager.

If you have answered 'Unsure' or 'No' then we encourage you to seek further advice. This could be from a trusted colleague, line manager, member of the SLT or ELT, or union representative in the first instance.

In most instances, a conversation with someone you trust will help you to identify a way forward that you are comfortable with and allows you to answer 'yes' to the above questions. If, having taken advice, you are still concerned, we encourage you to raise your concerns in line with our Speak Up policy.

## Speak Up

We are proud to have a diverse, talented and trusted workforce. We trust that if you come across a serious issue in the course of your work that you continue to do the right thing and raise your concerns.



Our Speak Up policy covers how to raise your concerns effectively so that we can support you and investigate your concerns thoroughly and fairly. Colleagues and those working on our behalf can do so by either emailing [SpeakUp@enwl.co.uk](mailto:SpeakUp@enwl.co.uk) or via our independent provider, Safecall (by phone 0800 915 1571 or via their website [www.safecall.co.uk/report](http://www.safecall.co.uk/report)). We also welcome our customers and other stakeholders to share their concerns with us via these channels.

Safecall is an independent organisation and concerns can be raised with them at any time, 24 hours a day, seven days a week. Calls are answered by a skilled member of staff who is trained to receive a report about concerns in the workplace. Calls are not audio recorded and all concerns received by Safecall are treated confidentially and should you wish, anonymously.

