

Public Interest Disclosure Policy

Top things to takeaway



Protected Rights

Legal protection under Public Interest Disclosure



Public Interest Concerns

Wrongdoing, illegality, safety, environment risks



Raise Concerns Confidentially

Report via managers, HR, or compliance



No Retaliation Permitted

Detriment or victimisation strictly prohibited



Investigated Promptly

Issues handled confidentially and thoroughly



External Escalation Allowed

Regulators may be contacted if unresolved

Proprietary Notice

Information contained in the document is accurate to the best of Node4's knowledge at the time of publication and is required to be treated as confidential at all times. Information presented herein may not be used, copied, disclosed, reproduced, or transferred to any other document by the recipient, in whole or in part, without the prior written authorisation from a Node4 authorised representative.

Version control and ownership

Policy owner: Kate Lincoln

Version no	Date	What changed	Changed by	Approver
1.0	14/12/2022	Approved version	Vicky Withey	Andy Gilbert
1.1	09/08/2024	Annual review	Eddie Adams	Kate Lincoln
1.2	12/03/2025	Rebrand	Eddie Adams	Kate Lincoln
1.3	15/04/2026	Rebrand	Eddie Adams	n/a

What is this policy for?

This policy sets out Node4's approach to raising and handling concerns (sometimes referred to as 'whistleblowing') where an individual reasonably believes a matter is in the public interest. It explains what types of concerns should be reported, how to raise them confidentially, how Node4 will investigate, and the protections available under the Public Interest Disclosure Act 1998.

Who is this policy for?

This policy applies to all Node4 employees and all other agents working on behalf of Node4. It is relevant to anyone who wishes to raise a concern about suspected fraud, misconduct, wrongdoing, or other matters that may be against the public interest, and to managers/HR/compliance staff who may receive, investigate, or support the handling of those concerns.

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Policy Statement

The **Public Interest Disclosure Act 1998** is a key piece of legislation protecting individuals who 'blow the whistle' in the public interest.

Node4 constantly strives to safeguard and act in the interest of the public and its employees. It is important that any fraud, misconduct, or wrongdoing, by employees or other agents, is reported and properly addressed.

This policy applies to all employees and all other agents of Node4, who are encouraged to raise concerns in a responsible manner ensuring transparency.

Individual responsibility

Any concern that is reasonably believed to be against the public interest should be reported, in that the practice or action is:

- A criminal offence.
- A failure to comply with any legal obligation.
- A miscarriage of justice.
- A danger to the health and safety of any individual.
- That the environment is being or is likely to be, damaged.
- An attempt to conceal information on any of the above.

Any individual raising legitimate concerns under this policy will not be subject to any detriment, either during or after employment. Node4 endeavour to ensure that the individual is protected from any intimidation or harassment by any other parties. Victimisation of an individual making a disclosure will be discouraged through disciplinary action which may include dismissal for gross misconduct.

Procedure

Concerns should be raised through line managers or if they are implicated through HR or compliance@node4.co.uk.

Any matter raised under this policy will be investigated promptly and confidentially. The outcome of the investigation, as well as any necessary remedial action to be taken, may not be shared verbally but will be included in the report.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated thoroughly.

Escalating concerns

Dissatisfaction of outcome can be escalated to a senior manager within Node4.

If appropriate remedial action has not been taken, the matter can be reported to the following authorities:

- HM Revenue & Customs

- The Financial Conduct Authority
- The Prudential Regulation Authority
- The Health and Safety Executive
- The Environment Agency or Scottish Environmental Protection Agency
- The Information Commissioner
- The Care Quality Commission
- The Care Inspectorate
- Healthcare Inspectorate Wales

Whistle blowers should not disclose to a non-relevant third party any details of any concern raised in accordance with this policy or publicise.