

Public

Ref: FOI/25/086

National Energy System Operator

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InformationRights@neso.energy

www.neso.energy

2 September 2025

Dear requester

Request for Information

Thank you for your request for information which was originally received by NESO on 29 July 2025. We acknowledged your request and asked for clarification, and you responded on 2 August, confirming that you would like NESO to consider your request for information under the Freedom of Information Act 2000 (FOIA).

Request

1. *Copies of NESO's Grievance Policy and Whistleblowing Policy.*
2. *Information relating to individuals that have pursued further education and any requests for repayment of previous employees who meet the criteria for repayments of fees as per the NESO's UK Educational Incentives Policy which includes:*
 - *Individuals withdraw from a course*
 - *Individuals fail to qualify (after taking appropriate re-sits)*
 - *Attendance and/or coursework are unsatisfactory.*
 - *Individuals leave employment prior to completion of course*

Our response

We confirm that we hold some information in scope of your request.

1. *Copies of NESO's Grievance Policy and Whistleblowing Policy.*

Please see enclosed NESO Grievance Policy and Speak Up Policy.

2. *Information relating to individuals that have pursued further education and any requests for repayment of previous employees who meet the criteria for repayments of fees as per the NESO's UK Educational Incentives Policy which includes:*
- a. Individuals withdraw from a course*
 - b. Individuals fail to qualify (after taking appropriate re-sits)*
 - c. Attendance and/or coursework are unsatisfactory.*
 - d. Individuals leave employment prior to completion of course*

In relation to question 2 we asked you to clarify your request, and you confirmed on 2 August:

'I wish to receive all information relating to the number of employees who have been supported to attend higher education external courses such as but not limited to a Master's Degree, where the course fees have been met by the company and where the policy refers to a need for them to repay fees if they do not comply with the policy requirements under relevant any circumstances. All of the examples listed could be such examples and I wish to know the number of staff who fall under these categories, who have and who have not had to repay their course fees. I wish to make this request in respect of both NESO and also National Grid staff, including those who have already left or who are currently employed at the date of this request.'

For information, the National Grid Electricity System Operator (NG ESO) was part of the National Grid PLC group of companies until 30 September 2024 and was not subject to the Freedom of Information Act 2000 (FOIA). On 1 October 2024 we became the National Energy System Operator (NESO) under government ownership (the Independent System Operator and Planner as designated in the Energy Act 2023).

Regulation 14 of the Energy Act 2023 (Consequential Amendments) Regulations 2024 (SI 2024/706) amended Part 6 of Schedule 1 (other public bodies and offices: general) of the FOIA, inserting the following: *"The Independent System Operator and Planner designated in accordance with section 162 of the Energy Act 2023 in respect of information held by it as a result of the exercise of its functions under, or as a consequence of, that Act."*

NESO has been subject to the FOIA since 1 October 2024 and may therefore refuse FOIA requests in respect of information collected, received, or created prior to Day 1. As National Grid ESO, we were not subject to the FOIA. We are therefore refusing your request as it relates to information that predates 1 October 2024.

Since 1 October 2024, 49 NESO staff have been approved to study under the UK Educational Incentives Policy.

The current NESO policy [P0030] states:

'The company will withhold further funding and will request full reimbursement of costs from the individual if any of the following occur unless there are extenuating circumstances:

- *Individuals withdraw from a course*
- *Individuals fail to qualify (after taking appropriate re-sits)*
- *Attendance and/or coursework are unsatisfactory.*
- *Individuals leave employment prior to completion of course.*

If the employee chooses to leave National Energy System Operator within two years of completing a further education course the costs will be reclaimed on a sliding scale:

- *100% if within 6 months*
- *75% if within 12 months*
- *50% if within 18 months*
- *25% if within 24 months'*

Of the 49 staff approved to study under the UK Educational Incentives Policy since 1 October 2024, fewer than 5 staff have met the conditions requiring repayment of the fees. Those staff who have met the conditions have been required to pay back the fees paid. Due to the low numbers, we are not disclosing the exact number of individuals who have met the conditions for fee repayment. We are engaging the exemption at Section 40(2) of the FOIA to withhold this information, as disclosure may enable the identification of an individual or individuals and would contravene any of the principles at Article 5 of the UK General Data Protection Regulations (UK GDPR). Specifically, we have determined that disclosure of personal data would contravene principle a) i.e. disclosure would not meet the requirement for processing of personal data to be lawful, fair and transparent.

This concludes our response to your request.

Next steps

If you are dissatisfied with our handling of your request, you can ask us to review our response. If you want us to carry out a review, please let us know within 40 working days and quote the reference number at the top of this letter. You can find our procedure here: [Freedom of Information and Environmental Information Regulations | National Energy System Operator](#). The ICO's website also provides guidance on the internal review process: [What to do if you are dissatisfied with the response | ICO](#).

If you are still dissatisfied after our internal review, you can complain to the Information Commissioner's Office (ICO). You should make complaints to the ICO within six weeks of receiving the outcome of an internal review. The easiest way to lodge a complaint is through their website: www.ico.org.uk/foicomplaints. Alternatively, they can be contacted at: Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

Thank you for your interest in the work of the National Energy System Operator (NESO).

Regards,

The Information Rights Team, National Energy System Operator (NESO)

SPEAK UP POLICY

An Introduction from Zoe Morrissey, Director of Legal and Regulation.

The Speak Up Policy applies to all colleagues, contractors and any other parties working for or on behalf of NESO.

National Energy System Operator (NESO) is committed to conducting business with fairness and integrity. Our aim is to prevent, detect, and respond quickly and appropriately to reports of misconduct, unethical behaviour, or breaches of the law, ensuring support and care for all impacted. We will do so in compliance with all applicable laws, regulations, our Code of Ethics, and other internal policies. We want every colleague at NESO to feel comfortable about speaking up where they see unethical conduct. Colleagues should be able to do so in good faith without fear of recrimination or retaliation. Raising a concern in 'good faith' simply means that our colleagues do not knowingly provide false or misleading information when reporting a concern.

This Speak Up Policy explains how concerns can be raised and how the company addresses those concerns. For clarity, once concerns are raised, they are addressed in line with applicable local laws and policies.

Contents	Page
Purpose of Policy	2
Matters covered under this policy	2
Matters not covered under this Policy	2
Good Faith.....	3
How to raise a concern	3
Governance	3
Process of managing raised concerns	3
Information to provide when raising a concern.....	4
Anonymous Concerns.....	4
Emotional Support	4
Recrimination and retaliation.....	4
Aftercare process.....	5
Confidentiality of raised concerns	5
Privacy.....	5

Training and communication	5
Related policies and procedures	5
Contact Information	6

Purpose of Policy

The purpose of the Policy is to provide guidance on:

- How colleagues can raise concerns
- The information that will be required
- The process for responding to concerns raised

Matters covered under this policy

This Policy applies to allegations of unethical and unsafe behaviour (including infringements of the Code of Ethics) and breaches of legal obligations including but not limited to:

- Discrimination, bullying and harassment
- Recrimination and retaliation
- Fraud or theft
- Bribery or corruption
- Insider trading or insider dealing
- Anti-competitive business practices
- Misuse of confidential information
- Conflicts of interest and potential conflicts of interest
- Improper accounting or auditing practices
- Breach of our policies for the giving or receiving of gifts, hospitality, or donations
- Breaches of any relevant legal obligations linked to safety, health, and environment
- Allegation that a criminal offence has been committed, is being committed or is likely to be committed
- Failure to comply with any other applicable legal obligation
- Violations of data privacy laws or regulations. (Note: An actual or suspected data breach, such as the loss, misuse, or theft of personal data, should be immediately reported to your line manager and the Cyber Response helpline to address).
- Deliberate concealment of serious misconduct

If the issue raised does not involve unethical or unsafe conduct nor breaches of legal obligations, we suggest that this is raised directly to Employee Relations in the first instance.

If it's not clear whether this Policy covers a concern, please contact the Ethics & Compliance Team. (see "How to Raise a Concern" below for more details).

Matters not covered under this Policy

This Policy must not be used:

- For any grievances or objections a colleague may have in relation to their terms of employment (including work assignments, compensation, promotion, benefits, etc.)
- To settle personal or legal disputes
- To make accusations which the reporter knows are false

- To malign or harass others
- To report events presenting an immediate threat to life or property - if emergency assistance is needed, please contact the relevant local authorities / emergency services as appropriate.

If the reporter is a contractor (i.e., providing services to NESO but not an employee of NESO), this Policy only applies if a concern is raised about unethical conduct or alleged unlawful behaviour or malpractice by NESO (or its employees) or if the concerns relate to the employing organisation's relationship with NESO.

Good Faith

Misuse of the Speak Up Policy or any investigation process to raise knowingly false reports or provide knowingly false information is prohibited and could result in discipline, up to and including termination.

How to raise a concern

There are several ways colleagues can raise a concern:

- 1 Colleagues can report a concern verbally, by email or in person to:
 - Their Line Manager or another Manager
 - People Business Partner or Chief People Officer
 - Ethics Team members directly or via [.box.soa.Ethics](mailto:box.soa.Ethics)
 - Ethics Network Representatives/Champions
- 2 You can raise a concern anonymously via our independent SeeHearSpeakUp external helplines:
 - UK free telephone on 0800 026 0477
 - Email report@seehearspeakup.co.uk
 - Website at <https://fileaconcern.org/neso>

We recognise colleagues may prefer to raise their concerns anonymously and the external helplines are a way to do this. The service is confidential, free to callers, and operates 365 days a year, 24 hours a day. The details of those who report via the helpline will remain confidential, if colleagues wish them to remain so, and will not be provided to NESO unless express permission is given to the external helpline to do so. Colleagues will be given a unique reference number and asked to call back or log back in if they want to leave further information or track the progress of the concern.

Governance

All concerns received, whether reported through internal or external channels, will be reviewed independently by the Ethics team and where appropriate, cases will be taken forwards.

We will provide regular reporting to the Chief Executive Officer on cases raised to our attention and also report to the Audit & Risk Committee and where appropriate, the Board.

Process of managing raised concerns

Once a concern is raised, the Ethics team with support from the People Team, where required, will review the report to determine whether the alleged conduct may violate the law, our Code of Ethics, or related policies. We may follow up with the person who raised the concern for additional information, if needed. If the concern warrants an investigation, we will assign the matter to an investigator.

Our investigators will be thorough and treat everyone involved in the process with care, respect, fairness, and objectivity - irrespective of their role or seniority within NESO. It is vital that investigators are able to conduct their investigation independently, and attempts to influence, obstruct or undermine the independence of an investigation will be treated as a misconduct issue.

We recognise that the investigation process can be stressful for those who have reported concerns and those against whom concerns are made. With this in mind, we endeavour to complete our investigations as soon as

possible (within 50 days on average) to minimise the stress and uncertainty for those involved. Please note that the duration of the investigation may increase based on the complexity of the investigation, including the number of concerns raised, the number of witnesses, and the amount of evidence to review. If an investigation concludes that an individual has breached the Code of Ethics, the matter will be referred to the relevant People Team for them to consider disciplinary and/or further action.

Information to provide when raising a concern

When raising a concern, please provide as much information as possible, so we can conduct a thorough investigation:

- What is the concern?
- What happened?
- When did it happen?
- Why did it happen?
- Is it still happening?
- Where did it happen?
- How often has it happened?
- Who is involved?
- Who are the potential witnesses?
- What evidence can be provided with the report?
- Is there any evidence which needs to be secured to avoid it being tampered with or concealed?

We ask that colleagues share their contact details with us if they are comfortable doing so, or that those that report a concern frequently check their anonymous report for correspondence from us. Being able to communicate with those that report a concern makes further inquiries easier.

Anonymous Concerns

We always encourage colleagues to raise concerns directly and openly through our internal Speak Up channels. We understand that, in some situations, colleagues may not feel comfortable doing this and our third-party helplines allow concerns to be reported anonymously. If reporting anonymously, please provide as much information as possible so that our Ethics Team has sufficient detail to review the matter. Where concerns are raised anonymously, we will not be able to share the conclusions of the investigation, but we will still act quickly to address and resolve the concern.

Emotional Support

We understand that colleagues who report concerns can experience stress and emotional support may be required during or following the process. In these instances, colleagues are encouraged to make full use of the available resources for support, should they feel comfortable to do so:

- Speak to their manager (if they are not implicated in the concerns raised)
- If colleagues can't speak to their line manager, they can speak to their Trade Union representative if they have one, or they can speak to their People Business Partner who can facilitate support for colleagues' wellbeing.
- Consider using the Employee Assistance Programme (EAP) available on NESO@home.

Recrimination and retaliation

Recrimination or retaliation or any adverse actions taken against an individual for raising a concern or providing any information in relation to a concern or investigation, in good faith or participating in an investigation is strictly prohibited.

Examples of potentially recriminatory or retaliatory conduct include, but are not limited to:

- Bullying and harassment, including sexual harassment
- Discrimination
- Threat and intimidation
- Physical abuse or violence
- Inappropriate maligning, or disparaging comments
- Isolation and exclusion
- Demotion, termination, or reassignment
- Unfair performance rating or evaluation
- Reduction in compensation

Recrimination and retaliation are a breach of NESO's policies, including our Code of Ethics. We do not tolerate retaliation towards colleagues who raise ethics concerns. Please report concerns relating to retaliation and recrimination to the Ethics Team or through our other Speak Up channels, details of which are in this Policy. Anyone who is found to have engaged in recriminatory or retaliatory behaviour will be subject to appropriate discipline, up to and including termination.

Aftercare process

Following an ethics investigation, we appropriately consider the risk of retaliation to the reporter and take any actions we may deem are necessary to manage that risk.

Confidentially of raised concerns

We treat reported concerns confidentially, which means we only share details with those who need to know, including when legally required to do so. To ensure fairness, we may need to inform the implicated person(s) that an allegation has been raised against them. We will not disclose the identity of the person(s) who initiated the complaint about the implicated individual(s) unless disclosure is required by law or legal process. Unless instructed otherwise, all information received from the Ethics Investigation Team, and shared with the Ethics Investigation Team must be treated as confidential. Confidentiality is important because unauthorised disclosures can jeopardise the fairness and efficacy of the investigation process, and may, under certain circumstances, be treated as misconduct.

Privacy

We are committed to protecting personal data associated with addressing a raised concern. Any personal data obtained in carrying out the duties under this Policy will only be used for the purposes explained in the Policy or to comply with the law or an important public interest. You can find more details on this in our Data Privacy Policy on NESO@home. In addition, our data retention schedule and NESO's Record Management Policy are also available on NESO@home.

Training and communication

Training on our Code of Ethics and related policies is available to all colleagues via training on MyHub. We also communicate regularly to outline expected behaviour and on how to raise concerns.

Related policies and procedures

- Code of Ethics
- Supplier Code of Conduct

- Disciplinary Policy
- Grievance Policy
- Ethics Case Management Procedure

Contact Information

National Energy System Operator Director of Legal and Regulation is accountable for the policy and the Head of Assurance is responsible for monitoring its effectiveness and will review the implementation of it on an annual basis.

Version number	V1.0 Approved
Owner	NAME REDACTED
Role	Head of Assurance and Compliance Officer
Author	NAME REDACTED
Team	Ethics and Compliance
Approved by	NAME REDACTED– Head of Assurance and Compliance Officer (Under Director of Legal and Regulation DoA)
Date approved	01 October 2024
Review frequency	Annually

Amendments

Version	Date	Change details
1.0	01-Oct-2024	Document created and approved as v1.0

Grievance Policy

Contents page

01	<u>Responsibilities</u>	03
02	<u>Procedure</u>	06
03	<u>Help & Support</u>	08
04	<u>Governance</u>	09

Responsibilities

Employees

- Employees are responsible for ensuring that they try to resolve workplace issues informally in the first instance. If such matters are not resolved informally, a grievance must be submitted in a written format if they wish to enter the formal procedure.
- Employees are responsible for ensuring that they familiarise themselves with this policy and the standards of behaviour expected of them. They must also undertake all mandatory training.

Supervisors & Line Managers

- Supervisors and first line managers are responsible for managing employee grievances should they arise. In particular, first line managers / supervisors should encourage resolution of issues before they reach the formal stage.
- Managers must ensure that complaints they are aware of are resolved as discreetly and promptly as possible and avoid unnecessary delay.
- All managers are responsible for ensuring this policy is implemented, observed and communicated to employees. Further, managers are responsible for stopping inappropriate behaviour they see from employees.

Investigating Officers

- Investigating Officers are responsible for holding a meeting with an employee to understand their grievance at a Grievance Hearing (stage 1). The Investigating Officer is responsible for investigating the employee's concerns and producing a summary report and outcome. The outcome should determine whether an employee's grievances are substantiated, partial substantiated or not substantiated.
- Investigating Officers will be an impartial manager, selected from a pool of managers trained in undertaking investigations. It is important that Investigating Officers conduct the process with impartiality at all times and this is also completed promptly and without unnecessary delay

Responsibilities

Appeal Managers

- Appeal Managers are responsible for hearing an employee's grievance appeal at an Appeal Hearing (stage 2). The Appeal Manager will consider the employee's points of appeal, undertaking any further investigations that might be necessary. The Appeal Manager will produce a summary report and outcome. The outcome should determine whether an employee's grievance(s) are substantiated, partial substantiated or not substantiated.
- Appeal managers will be impartial managers, selected from a pool of trained individuals. It is important that Appeal Managers conduct the process with impartiality at all times and also that this is completed promptly and without unnecessary delay.

Colleagues / Trade Union (TU) Representatives

- Colleagues or Trade Union representatives are responsible for supporting and accompanying employees to grievance meeting(s) if requested by the employee. They can help prepare for the meeting(s), submitting a grievance on behalf of employee if acting on their behalf, address the IO or Appeal Manager and confer with the employee. However, they cannot answer questions on the employee's behalf or give evidence themselves. If a chosen TU Representative is unable to attend a proposed meeting, then they can provide an alternative date and time within 5 working days and only in exceptional circumstances will a greater delay be granted as the aim is to resolve matters promptly and without unnecessary delay.

People Team

- The People team are responsible for providing advice and guidance to managers and employees and maintaining this policy.
- The Employee Relations & Case Management team is responsible for providing advice and support to managers and independent managers.
- The People team must also consider cases where mediation may be appropriate.

Responsibilities

All staff

(including employees, agency workers and contractors)

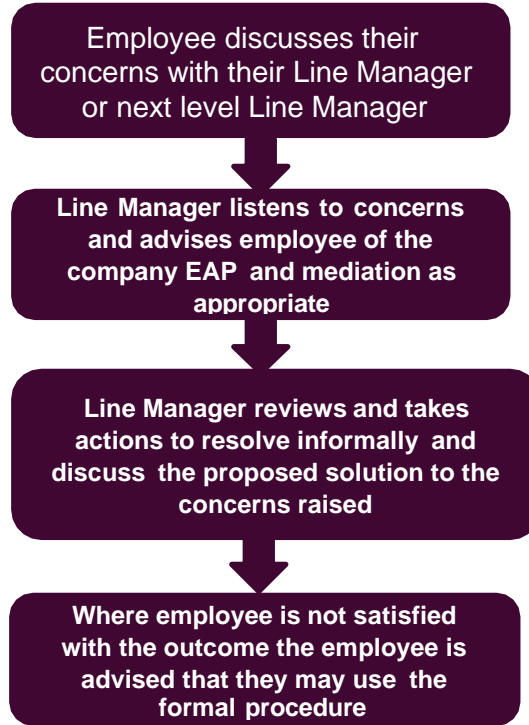
- All staff have a personal responsibility to behave in a manner that does not have a detrimental impact on another person's ability, well-being or confidence to carry out their work.
- All staff have a responsibility to speak out about any inappropriate conduct or treatment towards themselves or another member of staff. Regardless of whether that conduct is undertaken by another staff member or third party.

Pastoral Care Manager

- Acting as an additional support manager for an employee whilst they undergo a grievance process, but pastoral care managers are not themselves involved in the formal grievance procedure
- Keeping in contact with the employee throughout the grievance process and ensuring the employee has access to relevant support services
- Where required, acting as a contact point between the Company, the employee's normal line manager and the employee

Procedure

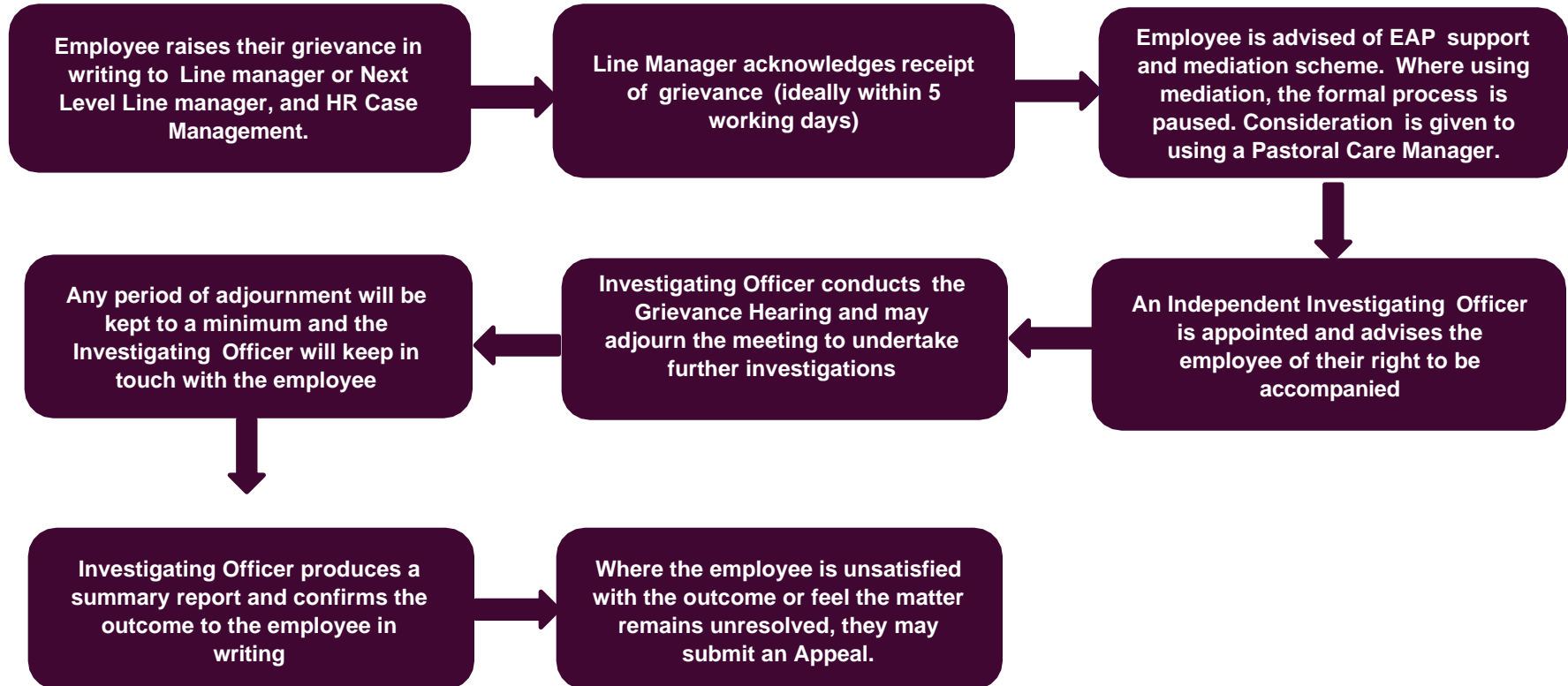
Procedural Flowcharts - Informal Grievance Procedure



If you feel unable to raise the issue with your line manager or next line manager then raise with .box.Hrcasemanagement.

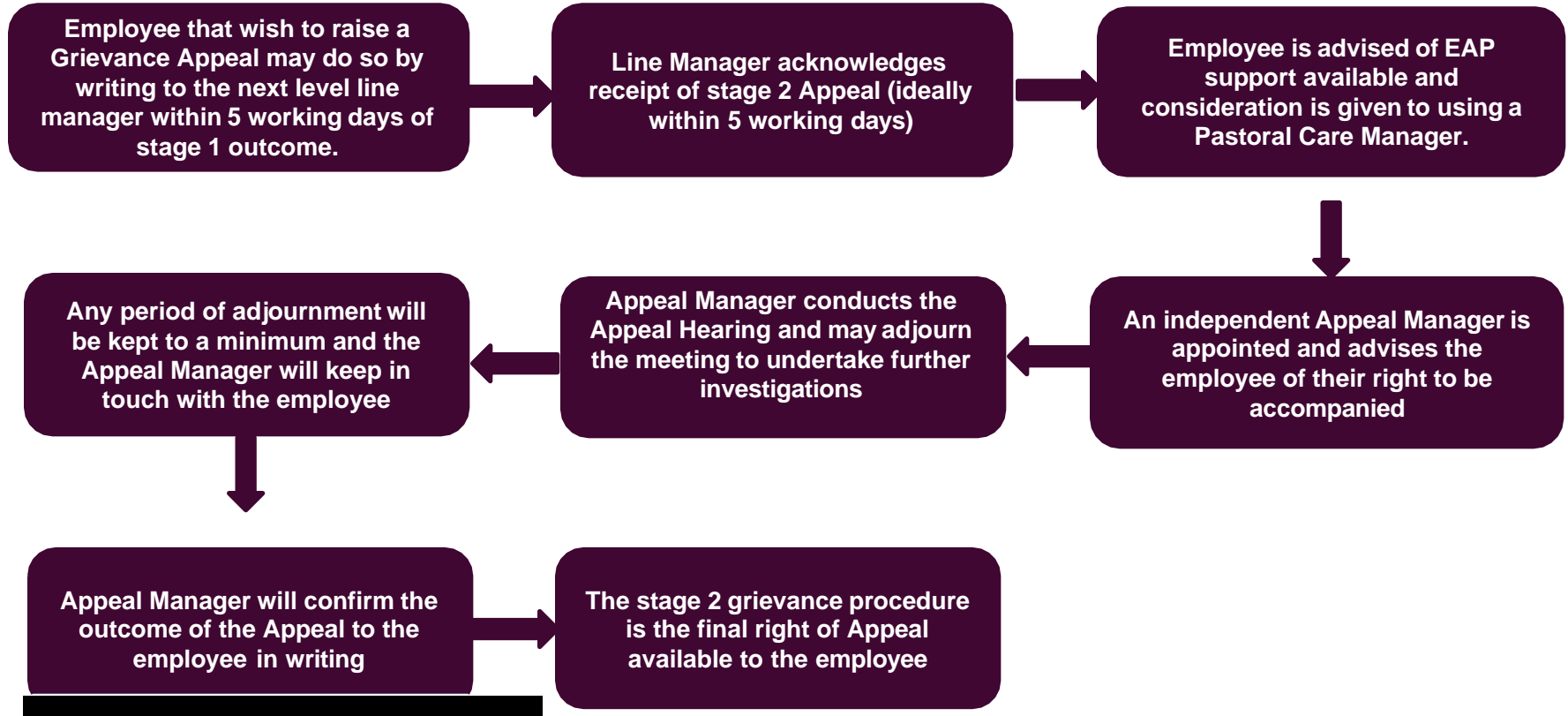
Procedure

Procedural Flowcharts – Formal Grievance Procedure (Stage 1)



Procedure

Procedural Flowcharts – Formal Grievance Procedure (Stage 2)



Help and Support

Employee Assistance Programme

Counselling is available under the Company Employee Assistance Programme (EAP) should any employee wish at any time to discuss the issue, in confidence, with an independent person.

Further information about the EAP can be found [here](#).

Occupational Health

This is a support mechanism for people who may be feeling unwell due to situation in which they find themselves. Help can be sort on strategies and support mechanisms.

Phone: [REDACTED]

Website: [REDACTED]

Employee Relations & Cases

Trade Unions

Please contact your relevant Trade Union representative.

ACAS

ACAS offers impartial advice on raising issues with your employer in regards to your employment. ACAS is a Government supported organisation and has guidance on all employment issues for both the employer and the employee

Governance

Version number	1.0	
Policy owner	Andreia de Melo Cabral	
Role	Chief People Officer	
Author	[REDACTED]	
Team	People Partnering & ER	
Approved by	[REDACTED]	
Date approved	01 July 2024	
Review Frequency	1 year	
Amendments		
Version	Date	Change details
1.0	01 July 2024	Document created and approved as v1.0

