



Title	Whistleblowing Policy
Ref No / Version No	HR001/Final Version 1.5
Author	Clinical Compliance and Training Director
Owner/Approver	Clinical Compliance and Training Director
Last date reviewed	04/12/2023
Next review due	04/12/2024

Version Control

Version	Date	Status	Author	Reviewer	Approver	Comments
1.0	01/03/19	Final	VF	RC	VF	
1.1	14/02/20	Final	VG	LB	VG	General review – minor changes
1.2	11/06/20	Final	VG	LB	VG	Specific guidance added around modern slavery
1.2	11/06/21	Final	VG	LB	LB	Review - No changes
1.3	24/06/22	Final	VG	LB	VG	Updated with dedicated whistleblowing mailbox
1.3	24/06/23	Final	VG	LB	LB	Updated with Natural HR
1.5	04/12/23	Final	VG	LB	LB	Updated to reflect staff changes

1 Purpose of this policy

1.1 Overview

Nurseplus is committed to conducting its business with honesty and integrity, and expects all staff to maintain high standards. All organisations, however, face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

The aims of this policy are to:

- Encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected
- Provide staff with guidance as to how to raise those concerns
- Reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

1.2 Applicability

This policy covers all staff including employees, officers, consultants, contractors, casual workers and agency workers.

1.3 Implementation and Governance

The *Directors* have overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The *Whistleblowing Officer* has day-to-day operational responsibility and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

The *Whistleblowing Officer*, in conjunction with the *Directors* will review this policy from a legal and operational perspective at least once a year.

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

Comments, suggestions and queries should be addressed to the *Whistleblowing Officer*.

2 Policy Statement

2.1 What is Whistleblowing?

“Whistleblowing” is the disclosure of information relating to suspected wrongdoing or dangers at work. This may include:

- criminal activity
- failure to comply with any legal or professional obligation or regulatory requirements
- miscarriages of justice
- danger to health and safety
- damage to the environment

- bribery
- financial fraud or mismanagement
- negligence
- breach of our internal policies and procedures
- conduct likely to damage our reputation
- unauthorised disclosure of confidential information; and
- the deliberate concealment of any of the above matters.

A “*whistleblower*” is a person who raises a genuine concern relating to any of the above.

If a staff member has any genuine concerns related to suspected wrongdoing or danger affecting any of Nurseplus activities (a “*whistleblowing concern*”) it should be reported under this policy.

This policy should not be used for complaints relating to personal circumstances. In those cases the Grievance Procedure or Anti-harassment and Bullying Policy should be used as appropriate. If in doubt, the *Whistleblowing Officer* should be contacted for advice.

2.2 Raising a Whistleblowing concern

Nurseplus hopes that its staff and workers will be able to raise any concerns initially with their Line Manager who will ensure that it is dealt with appropriately.

If an individual prefers not to raise it with the manager, the matter can be referred directly to the *Whistleblowing Officer* or to any other *Director* via the dedicated confidential whistleblower mailbox monitored only by the *Executive Assistant*.

Confidentiality

Nurseplus wants its staff to feel comfortable raising concerns openly but also appreciates that some may want to report concerns confidentially. In these circumstances, Nurseplus will keep the *whistleblower’s* identity confidential unless required to disclose it by law. Staff and workers can choose to raise whistleblowing concerns anonymously but that may make it more difficult to investigate thoroughly and is not encouraged.

Investigation and outcome

Once a concern has been raised, Nurseplus will carry out an initial assessment to determine the scope of any investigation. The Company may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the Company to minimise the risk of future wrongdoing. Where practical, the Company will aim to keep the whistleblower informed of the progress of the investigation.

If the investigation concludes that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

While the Company cannot always guarantee the outcome expected by a whistleblower, it will try to deal with concerns fairly and in an appropriate way. By using this policy staff can help the Company achieve this. If, following investigation, the whistleblower is not happy with the way in which their concern has been handled, they can raise it with one of the other key contacts set out below.

Modern Slavery and Human Trafficking

The forms page of the Nurseplus intranet, Natural HR offers a quick link directly to a reporting

mechanism as well as further government guidance on indicators of Modern Slavery and Human Trafficking and victims rights. Reports are monitored by the Clinical Compliance and Training Director who will in turn report to the modern slavery helpline if applicable.

External disclosures

Nurseplus provides an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases staff should not find it necessary to alert anyone externally. In some circumstances it may be appropriate for individuals to report concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. The Company strongly encourages its staff to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy. Whistleblowing concerns usually relate to the conduct of the Company's staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect individuals if they raise the matter with the third party directly. However, the Company encourages its staff to report such concerns internally first.

Contacts

Whistleblowing Officer	Victoria Gidalla Victoria.gidalla@nurseplusuk.com / 01233 510487
Confidential Nurseplus Whistleblowing mailbox	Monitored by the Executive Assistant, any concerns raised will be redirected to the Director requested where possible, or another Director if appropriate. whistle@nurseplusuk.com
Nurseplus External Auditors	Grant Thornton Grant-thornton.co.uk / 01293 554130
Public Concern at Work	whistle@pcaw.co.uk www.pcaw.co.uk / 0207 404 6609
Care Quality Commission	enquiries@cqc.org.uk www.cqc.org.uk / 03000 616161
Modern Slavery Helpline	https://www.modernslaveryhelpline.org/report 0800 0121 700

3 Procedures and further reading

3.1 Applicable procedures

Training in this policy is part of the Nurseplus induction training for staff and workers.

How do I raise a whistleblowing concern?

3.2 Further reading

CQC whistleblowing “Guidance for providers registered with CQC (issued November 2013): www.cqc.org.uk/whistleblowing

Public Concern at Work is an independent whistleblowing charity. www.pcaaw.co.uk