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Wellcome Care Homes are committed to operating at all times, and in everything that we do, to the highest standards of integrity.

1. Policy Statement.

This policy should be read together with your individual contract of employment and relevant Employee Agreement. This policy is non-contractual and applies to all permanent, bank and contracted employees who are employed on a full or part-time basis by the Company

It sets out what you should do if you have reason to believe that something is unlawful or unethical or dangerous and is going on at work and it is affecting (or risks affecting) residents, you or others in the workplace.

When you report these kinds of concerns, this is called whistleblowing.

This policy also covers the actions of third parties such as suppliers, service providers, and visitors, as well as our employees. If you are concerned about a third party, please also raise the problem with your Manager in the first instance who will be able to explain how you should proceed.

2. General Principles

We will always take your concerns seriously and they will be thoroughly investigated by the appropriate personnel and or governing bodies. Most importantly, you should feel confident to follow the procedure with confidence. There will be no reprisals for individuals who bring these concerns to our attention – we value and respect all such reports and those who make them to us. We all play an important role in ensuring that our homes and everyone working in them acts professionally, lawfully and appropriately.

The sort of activities that are typically considered relevant to whistleblowing are as follows:

- Any activity you suspect puts health and safety at risk
- Any activity you suspect may damage the environment
- Any failure to comply with legal or regulatory obligations
- Any failure to meet professional requirements
- Any failings that may result in neglect
- A criminal offence

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This is not an exhaustive list, but the types of concerns you may want to raise with us by whistleblowing.

Please speak to your Registered Manager or if you are unsure whether something that you are concerned about is covered by this policy.

If your complaint is about the behaviour of others towards you, our bullying and harassment policy or grievance policy contain the relevant guidance on how to proceed. These types of behaviour are not covered by this whistleblowing policy.

All information collated within this process will be held in line with Current Data Protection Regulations 2018. Please refer to the Data Protection Policy and Procedure for further details.

3. Confidentiality and Anonymity.

You are always encouraged to raise concerns openly, and we actively discourage anonymous whistleblowing. This is because it is not always easy to manage and to investigate anonymous reports, especially since if we are unable to ask you for clarification for further details, we may struggle to clarify and find evidence to support your allegations and/or reach an informed conclusion. In these circumstances, we risk missing evidence or opportunities to gather important supporting information, or identify helpful witnesses, because we may simply be unaware of their existence, in spite of our best efforts to uncover them.

If you prefer to keep your identity anonymous, we will do all that we can to ensure that you retain your anonymity, and the confidentiality of your concerns, as far as possible. If we need to disclose your identity to others as part of the investigation, we will always discuss with you beforehand both our desire and our reasons for wishing to identify you.

We will protect you from reprisals, and you can read more about how we do this and what rights you have in section 4 below.

There are no reprisals for mistakes or if following our investigations, (which we will always conduct thoroughly and conscientiously), we conclude that there has been no breach of law, policy or unethical conduct. However, to qualify for protection, the disclosure must, in the reasonable belief of the worker making the disclosure, show that one or more of the following events has happened, is happening or is likely to happen and that it is in the best interest of all living, working and visiting the home to make the disclosure:

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- A criminal offence
- Failure to comply with any legal obligation/Code of Professional Practice for Social Care
- Danger to health & safety of any individual
- Danger to the environment, or,
- Deliberate concealment of any of the above.

If at any time, you do not feel that you have been fairly or properly treated by us in the handling of your whistleblowing concern, you must inform us immediately. You should inform Your Manager in the first instance; and if you are not satisfied with the outcome of that conversation, you should follow the process set out in our grievance policy.

We also protect Whistleblowers from others, so where a Whistleblower reports to us that they have been treated inappropriately by others, (including having received threats as a result of raising their concerns), we will take disciplinary action against those individuals. The consequences of us taking this action could include dismissal of such individual(s) for gross misconduct.

Our policy covers the process for raising, investigating, and resolving wrongdoing within Wellcome Care Homes. The whistleblowing procedure that we have carefully put in place has been designed to ensure that to the best of our ability, we are able to resolve any concerns and to protect you as part of this process.

However, we recognise that potentially, in exceptional circumstances, you might wish to involve an external body such as CIW, Safeguarding an independent body external to the company to support you with the type of issue you may want to raise.

4. Procedure for raising a whistleblowing concern.

- Raise your concerns with Your Manager in the first instance. You may do so in writing or in person.
- If you would prefer not to discuss your concerns with your manager or you consider that your concerns are extremely serious, you should write to the Responsible Individual in the first instance.
- Please explain that you are raising your concerns as part of the company's whistleblowing policy and procedure. Then set out all the key facts, including names of those involved and all relevant dates.

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- You will be invited to a meeting at which you can discuss your concerns. You are entitled to bring a representative with you to this meeting – and any subsequent meetings. That companion may be a colleague (or union representative, if relevant).
- Anyone who accompanies you will be asked to agree to keep strictly confidential the contents of the meeting including any materials disclosed and/or examined during it. This obligation of confidentiality will extend before, during and after the meeting and any following investigation that we conduct in relation to the concerns raised by you.
- Following this meeting, we will investigate the matters raised and we may request that you come to additional meetings to assist us in our efforts. We may also need to involve relevant external bodies to help us conduct a thorough, fair and responsible investigation or to carry out an investigation if it is a Safeguarding issue. Please see Safeguarding of Vulnerable Adults Policy.
- Relevant personnel involved in this investigation will keep you informed about the progress of the investigation as far as they are able. For a number of reasons, generally relating to legal obligations, including obligations of confidence, to others, or in relation to any legal advice that we may decide to take on our own behalf, we may not be able to share every detail of our discoveries or deliberations with you.
- We will always endeavour, however, to reassure you, as best as we can, of the fact that we are taking your concerns seriously and that we are conducting a responsible investigation.
- It is possible that the outcome of our investigations will not be one that you find satisfactory. If this happens, you are entitled to appeal the decision made to one of the company's directors and request a review of what has been done and concluded.
- If you have raised a concern in good faith, our process and all those involved in giving effect to it will support and protect you. However, if a false concern is raised with us in bad faith (e.g. for malicious reasons), we will invoke our disciplinary policy and you may be subject to disciplinary action.

5. Summary.

- **The company reserves the right to make any changes to this policy and procedure from time to time or to keep in line with any changes to employment legislation.**